

Appendix A
**Notice of Preparation/Initial Study
and Comment Letters**



NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE RIVERSIDE HOUSING AND PUBLIC SAFETY ELEMENT UPDATES AND ENVIRONMENTAL JUSTICE POLICIES PROJECT

The City of Riverside (City) will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the proposed Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Project (Project or proposed Project). The City is requesting input from you or your agency as to the scope and content of the environmental information relevant to your agency's or organization's statutory responsibilities or interests in connection with the proposed Project.

This Notice of Preparation (NOP) contains a description of the proposed Project, including project setting and location, and identifies the potential environmental effects of the proposed Project. Regional and vicinity maps are included in this NOP as Figures 1 and 2.

Case Number: PR-2021-001058

Project Title: Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Project

Lead Agency: City of Riverside
Community and Economic Development Department, Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

Contact Person: Matthew Taylor, Senior Planner

Phone Number: 951.826.5944

Email: mtaylor@riversideca.gov

Project Location: Citywide

Existing General Plan Designation: Various (Refer to Figure 3.)

Existing Zoning: Various (Refer to Figure 4.)

Interested Parties: Comments and concerns regarding the environmental issues associated with implementation and approval of the proposed Project are requested from organizations and individuals.

Public Comment Review Period: Due to time limits mandated by State law, your response must be received at the earliest possible date, but not later than 30 days after receipt of this NOP. The public comment period for this NOP begins on April 5, 2021 and is set to close at 5:00 p.m. on May 5, 2021.

Please send written responses, including your contact information and name of your organization (if applicable), to:

Matthew Taylor, Senior Planner
City of Riverside Community and Economic Development Department, Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
Phone Number: 951.826.5944
Email: mtaylor@riversideca.gov

Document Availability: The Initial Study is available on the City's website at www.riversideca.gov/housingupdate. Matthew Taylor, Senior Planner, can also be contacted to obtain an electronic copy.

Scoping Meeting: A virtual public scoping meeting about the proposed Project.

Meeting Information: Thursday, April 22, 2021
6:00 p.m. (Pacific Standard Time)
Attend the virtual meeting live webcast:

Zoom Webinar Information

Webinar link:

<https://zoom.us/j/93380881962?pwd=RDgwSXg1YWFKaDVFOGhpbEV6K2pZQT09>

Webinar ID: 933 8088 1962

Passcode: 5851

Phone: +1 (213) 338-8477

Text Line: (661) 241-8994

Registration link:

https://zoom.us/webinar/register/WN_XIYusELwTZS7x08Lat3Y-w

Línea telefónica en español

Teléfono: +1 (872) 240-3311

Código de acceso: 269-232-901

Línea de texto: (661) 241-8994

The purpose of the public scoping meeting is to inform the public that the City is evaluating the Project under the California Environmental Quality Act (CEQA) process. It will also provide a forum for submittal of public comments regarding the type and extent of the environmental analysis that will be undertaken under the EIR.

Note: No pre-registration is required. Entering the web address above will directly take you to the broadcast room sign-in. Name and email address are required to enter the broadcast room to keep track of attendees. Questions and comments will be received using the chat feature and addressed by the presenters.

1.0 PROJECT LOCATION AND SETTING

The City of Riverside (City) is in western Riverside County. It is bounded on the north by the Santa Ana River and the Cities of Jurupa Valley, Colton, and Rialto (San Bernardino County); on the south by the unincorporated communities of Woodcrest and Mockingbird Canyon; on the north and east by the unincorporated community of Highgrove and the City of Moreno Valley; and on the west by the unincorporated community of Home Gardens and the Cities of Norco and Corona. State Route 91 (SR-91), a major regional freeway, traverses the City in an east-west orientation, while State Route 60 (SR-60) and Interstate 215 (I-215) traverse the City's eastern portion in a north-south orientation. The Riverside Municipal Airport is within the western portion of the city limits. March Air Reserve Base and Flabob Airport are adjacent to the City in Riverside County. Figure 1 illustrates the regional context for the City, and Figure 2 illustrates the local context.

The City's existing corporate boundaries include approximately 51,310 gross acres. The Northern Sphere of Influence (SOI) encompasses approximately 4,088 gross acres—from the existing city limits to the San Bernardino County line and east to the Box Springs Mountain Regional Park—and includes the Highgrove community. The Southern SOI encompasses approximately 36,826 gross acres and extends from the City's southern border to the Cajalco Ridge crest, just south of Cajalco Road. The area includes the communities of El Sobrante, Glen Valley, Woodcrest, and limited portions of Gavilan Hills and Lake Mathews. In 2006, the Riverside Local Agency Formation Commission conducted a review of the City's SOI areas and affirmed the boundaries identified above. Overall, the City's Planning Area encompasses approximately 92,224 gross acres.

The Housing and Public Safety Elements are citywide planning documents associated with the *Riverside General Plan 2025*. A component of the Housing Element update is a rezoning program that involves multiple sites at various locations in all parts of the City. Environmental justice policies are an additional component of the proposed Project. The geographic setting for the Project is the entire City of Riverside. Figure 3 illustrates the General Plan Land Use Designations for the City, and Figure 4 shows its existing zoning.

2.0 BACKGROUND

The City has a population of approximately 328,155 persons as of January 2020 (Department of Finance 2020). In the City's recent history, population growth has been constant, adding approximately 40,000 new residents each decade since the 1960s. Past growth has been fueled by the City's attractive housing market due to its affordable offerings. Despite periods of economic recession, the City has continued to experience consistent growth.

The City's population is anticipated to continue to grow. According to the *Final Program Environmental Impact Report for the City of Riverside General Plan and Supporting Documents* (GP FPEIR), the City has a projected population of 383,077 persons at General Plan buildout (2025), including 346,867 persons within city limits and 36,210 persons within the City's SOI (City of Riverside 2007). According to Southern California Association of Governments (SCAG), the City's population is projected to increase to 395,800 by 2045 (SCAG 2020).

According to the State Department of Finance estimates, as of January 2020, the City's housing stock was estimated at 101,414 dwelling units (du), with a projected increase to 115,100 du by 2045 (SCAG 2020). Single-family detached units compose the majority (68 percent) of housing in the City. Within this general category, single-family du can range from smaller detached units or attached homes with two to four units to larger estate homes. Multi-family units, primarily apartments, compose approximately 30 percent of the City's housing stock, while mobile homes

compose approximately 2 percent. The City also has a substantial number of units targeted for seniors (both independent and group), students, and people with disabilities.

Housing and Public Safety are two of the 12 elements that constitute the *Riverside General Plan 2025*. The General Plan serves as the City’s blueprint for future growth and is a key tool for influencing and improving the quality of life for residents and businesses. The General Plan helps the City plan for important community issues such as new growth, housing needs, and environmental protection, and for sustainability plans for future social, physical, and economic development. It also addresses issues that affect the entire City, such as how land is used, where buildings are constructed, and how the transportation network works. The City’s update to the Housing and Public Safety Elements—in conjunction with Zoning Code and Specific Plan Amendments and the addition of environmental justice policies—will be evaluated as the proposed Project in a forthcoming EIR. An update to the Public Safety Element is required at the time the Housing Element is updated, per Senate Bill 1035. The proposed Project is the first phase of an overall update to the *Riverside General Plan 2025*. Once this phase has been completed, the City will pursue comprehensively updating the remaining 10 chapters of the General Plan as a separate project during a later phase.

2.1 Regional Housing Needs Assessment (RHNA)

The Statewide Regional Housing Needs Assessment (RHNA) is an assessment process performed every 8 years through which the State of California provides the number of housing units that must be planned for in the Southern California region. The RHNA represents the projected future housing need for all income levels in a region and is used in land use planning to prioritize local resource allocation and to assist with addressing existing and future housing needs. The City last updated the Housing Element in 2018 as a mid-5th cycle revision.

In the 2021–2029 Housing Element Cycle (6th cycle), the City’s RHNA allocation is a minimum of 18,458 new housing units. The City’s previous Housing Element was adopted in 2017 and runs through 2021, thus the need for this update. The Housing Element cycle covering the 2013–2021 period included an RHNA allocation of 10,025 units, of which only a small portion were built during the last 8 years. Given that 100 percent of potential housing sites will be developed to full potential, the City has provided a buffer of approximately 5,500 dus (approximately 30 percent over and above the RHNA allocation), and the City will identify space for up to 24,000 new homes for the 2021–2029 RHNA cycle. This next update cycle comes when California faces a major statewide housing shortage that is affecting all Californians by raising the price of housing and the cost of construction, and by increasing homelessness.

2.2 Environmental Justice Requirements

The City is also required by State law (Senate Bill [SB] 1000) to include environmental justice goals and policies in the General Plan. Environmental justice is defined by the State of California as the “fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of laws, regulations, and policies” (California Government Code Section 65040.12(e)).

3.0 PROJECT OBJECTIVES

Preliminary objectives of the proposed Project are:

- Plan for up to 24,000 new housing units by 2029 across the City to meet the City’s RHNA obligation.
- Affirmatively further fair housing and identify potential environmental justice and social equity issues to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children.
- Ensure affordable housing is added in many areas across the City and not concentrated in areas with lower access to amenities or near sources of pollution.
- Add a variety of housing opportunities that will make Riverside a more accessible and resilient community.
- Locate new housing in areas readily accessible to services, parks and other amenities, transit, jobs, and activity centers.
- Identify vacant or under-developed sites, meaning sites with substantial unused land or development potential.
- Limit or prevent housing development in areas with development constraints, such as agricultural and conservation lands, airport influence areas, and, to the extent feasible, fire and flood hazard zones.
- Address the public safety and public health needs and concerns of its residents, businesses, institutions, and visitors, and set forth a proactive and coordinated program of protection for all foreseeable natural and human-caused hazards.
- Reduce the potential adverse impacts of housing near undesirable land uses, along major corridors, or near similar uses.

4.0 PROJECT DESCRIPTION

4.1 Housing Element Update

To meet the RHNA requirements, City staff are currently working on the Housing and Public Safety Element updates and environmental justice policies as part of the proposed Project. The main components of the Housing Element update are dictated by State law and typically must include:

- A detailed analysis of the City’s demographic, economic, and housing characteristics
- A comprehensive analysis of the barriers to producing and preserving housing
- A review of the City’s progress in implementing its adopted housing policies and programs
- An identification of goals, objectives, and policies, in addition to a full list of programs that will help the City carry out the plan’s vision
- A list of sites that could accommodate new housing, demonstrating the City’s ability to meet its target number of new homes established in the RHNA

The updated Housing Element must show the exact locations where future housing can be built, called opportunity sites, and identify the potential number of homes that can be built at those

locations. During the beginning stages of reviewing housing locations, the City has limited or eliminated sites:

- With sensitive habitat or species
- Where the topography is not conducive to building
- That are unsafe because they are in a flood zone, high-fire area, or airport land use area
- Where voter-approved zoning rules restrict development, such as in the agricultural greenbelt and on hillsides
- High biological sensitivity areas like arroyos and canyons

Areas that could be designated for additional housing include:

- Vacant lots not designated as open space
- Underused sites, such as lots with buildings that are empty, deteriorated, or no longer needed
- Locations where more homes could easily fit within the same space than are there today
- Locations near public transit and essential services like libraries and neighborhood-serving shopping and amenities
- Areas where housing could be added near commercial buildings or in business parks, creating “live-work” neighborhoods
- Sites where infrastructure, such as water and sewer service, can support more housing

During the planning process, opportunity sites were identified for accommodation of future housing projects to meet the housing demand. These opportunity sites are identified in Figures 5 through 18.

Because the Housing Element is updated every 8 years, the 5th cycle Housing Element provides a foundation for this 6th cycle update. This update gives the City the opportunity to evaluate the previous Housing Element to determine which parts have been effective and which should be improved.

In addition to updates to the Housing and Public Safety Elements, and new environmental justice policies, the Project includes Zoning Code and Specific Plan Amendments to accommodate housing needs.

4.2 Public Safety Element Update

The goal of a jurisdiction’s Public Safety Element is to reduce the potential short- and long-term risk of death, injuries, property damage, and economic and social disruption resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards. Other locally relevant safety issues—such as emergency response, hazardous materials spills, crime reduction, and response to global pandemics like Covid-19 beginning in 2020 and continuing through 2021—may also be included. The Public Safety Element directly relates to topics mandated in the Land Use and Urban Design and Open Space and Conservation Elements as well as a key consideration for the environmental justice policies of the General Plan. The Public Safety Element must identify hazards and ways to reduce those hazards to guide local decisions related to zoning and development regulations. Policies and implementable actions may include methods for minimizing risks, as well as ways to minimize economic disruption and speed up recovery following disaster. The City’s update to the Public Safety Element will identify public safety issues and needs anticipated to be of ongoing concern to people in the City. The Public Safety

Element will ensure that the City takes action to reduce natural and man-made hazards and safety threats as well as respond quickly to any public safety incident.

4.3 Environmental Justice Policies

Environmental justice goals are achieved when everyone in the City has the same degree of protection from environmental and health hazards; a healthy environment in which to live, learn, and work; and equal access to the decision-making process. Environmental justice policies will be aimed at reducing health risks, promoting civic engagement, and prioritizing the needs of disadvantaged communities with implementable actions that achieve them. Environmental justice goals and policies will be developed by identifying disadvantaged communities and demographics and conducting community outreach to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

4.4 Opportunity Sites

The City has made a good faith attempt to equitably distribute the opportunity sites throughout the City in each of the seven wards so as not to place an undue burden on any one ward if possible. The process of developing the opportunity sites involved identifying and eliminating sites with constraints to development. Overall, the identified opportunity sites, with Zoning Code and Specific Plan Amendments, could accommodate up to 30,190 housing units. The total number of housing units that could result from implementation of the Zoning Code and Specific Plan Amendments includes the 18,458 housing units that would be required to meet the RHNA and an additional approximately 5,500 housing units to account for less than 100 percent development of at least some of the sites.

Site inventory analysis for the City of Riverside was initially conducted using a data-driven process to surface as many sites as possible. A weighted suitability model was used to evaluate multiple criteria influencing the likelihood of development on a parcel-by-parcel basis. Each property was assigned a total weighted score, where the higher the score the greater the likelihood of development. The following factors were used in this process:

- Existing Land Use was used to identify properties with industrial, commercial, office, and mixed use uses active on the site as defined by Riverside County. These uses either currently allow for housing production or could support housing in the future with zoning amendments. Single-family residential existing land use properties were generally excluded from further consideration.
- General Plan Land Use looks at what is allowed within the General Plan future land use map, which may allow for housing in the future on a site that currently does not support housing. Targeted land uses include multi-family residential, industrial, commercial, office, and mixed use.
- Year constructed of developments on the property as defined by Riverside County Assessor was used to identify older properties more likely to redevelop as opposed to newer properties less likely to redevelop.
- Improvement Ratio, which looks at the ratio between the value of improvements (buildings, or other construction) versus the value of the underlying land (improvement value/land value), is considered a market factor influencing the likelihood of development. When the underlying land is worth more than the improvements on the land, the property is more likely to redevelop.

- Lot Acreage was evaluated given the importance of lot size according to the California Department of Housing and Community Development site inventory criteria for the 6th cycle RHNA process. Lots with an area less than half an acre are considered too small to produce enough housing to support affordability. Lots larger than 10 acres are likely too expensive for affordable housing developers to purchase. Therefore, the analysis looked for properties greater than half an acre and smaller than 10 acres.
- Lot Vacancy is a key driver for the site inventory process given the ease of developing housing on vacant lots. Initially Riverside County existing land use information was used but manual review of each site was required to ensure accuracy.
- Underutilization Index looks at the amount of actual lot coverage, actual building height, and actual floor area developed on a property compared to what is allowed by zoning. The greater the difference between what is actually developed versus what is allowed, the greater the property is underutilized and is a target for development.
- Airport Compatibility Zones removes properties from consideration if the properties are in the most restrictive airport land use areas: A, B1, B2, C, C1, and C2.
- Current Zoning is used in similar ways as Existing Land Use and General Plan Land Use.
- City Opportunity Sites contains a list of target sites identified by the City for consideration based on City staff's expert local knowledge.
- Pipeline projects contains a list of active development projects known currently tracked by the City. These sites were eliminated from consideration.
- 5th cycle RHNA sites were automatically included in the analysis so long as the sites were not already developed.
- Lastly, a Manual Override flag was used to include or exclude properties based on detailed manual evaluation of each site by the City.

4.5 Zoning Code Amendments

Areas of the City are proposed for rezoning to allow for fulfillment of the City's RHNA. The proposed Zoning Code and Specific Plan Amendments would include mixed-use categories, which would provide for development of some lower-level commercial/retail, office, and potentially live/work uses. Areas proposed for rezoning are illustrated in Figures 12 through 18. For purposes of the CEQA analysis, the maximum of development that could be allowed will be analyzed in the forthcoming EIR. As stated previously, the City identified an inventory of potential opportunity sites to accommodate the RHNA obligation and buffer. Using mapping tools, the first step involved identifying sites across the City that could potentially accommodate housing. Criteria was used to identify the initial inventory, including identifying undeveloped or underdeveloped sites, or sites with vacant buildings, high rates of vacancy, etc. Sites were then removed from the potential inventory if there were extra protections imposed by Proposition R, Measure C, or housing restrictive zoning (i.e., airport land use incompatibility); if there were known environmental risks like high fire hazard or floodplain areas; if there was a lack of available infrastructure services, such as wet or dry utilities; or if there were no amenities in the vicinity, like transportation access or employment centers.

The next step in the process included development of scenarios to meet the RHNA obligations. Not all opportunity sites identified in the preliminary inventory are currently zoned to allow for housing development. The following scenarios were developed to identify options obtaining the RHNA obligations.

For the 6th cycle Housing Element, the City is also able to “take credit” for approximately 3,000 units that are currently in some stage of development and an estimated 800 to 1,000 accessory dwelling units citywide.

The next step involved refining the preliminary opportunity sites to develop a Preferred Alternative, or the proposed Project, to accommodate the RHNA obligations. Potential opportunity sites were prioritized for inclusion and others were selected for removal based on the refinement process of ensuring sites met identified criteria and were also dispersed throughout the City.

The opportunity sites’ existing on-site conditions indicates that approximately 542 acres (approximately 74 percent) of the opportunity sites are developed to varying degrees with residential and non-residential land uses, while the remaining approximately 194 acres are undeveloped. Approximately 222 du and approximately 6 million square feet of non-residential land uses are located on the opportunity sites.

4.6 Specific Plan Amendments

The Housing Element will require amendments to seven specific plans in the City. These Specific Plan Amendments would involve updates to allowed uses in certain districts, include adding residential land uses as an allowed use, changing the boundaries of some districts, or revising land use area tabulations. The following specific plans will require updates, including mapping and land use changes, to accommodate opportunity sites that have been identified within their existing specific plan boundaries. The specific plan areas subject to change are illustrated on Figure 19, and specific proposed changes are illustrated on Figures 20 through 22.

- Downtown Specific Plan
- Magnolia Avenue Specific Plan
- University Avenue Specific Plan
- Riverside Marketplace Specific Plan
- Canyon Springs Business Park Specific Plan
- Hunter Business Park Specific Plan
- La Sierra University Specific Plan

Table 1 summarizes the opportunity sites identified by the City that will not require zoning changes. Table 2 provides information concerning the opportunity sites that are proposed to be rezoned.

Table 1. Opportunity Sites Requiring No Zoning Code or Specific Plan Amendments

Ward	Total Acreage	Total Maximum # DU Allowed
Ward 1	122	4,491
Ward 2	10	484
Ward 3	3	101
Ward 4	20	587
Ward 5	32	1,316
Ward 6	40	1,504
Ward 7	27	668
Total	254	9,151

Source: City of Riverside 2021.

Table 2. Opportunity Sites with Associated Zoning Code and Specific Plan Amendments

Ward	Total Acreage	Maximum # DU Allowed under Current Zoning	Maximum # DU Allowed under Proposed Zoning	Net Increase
Ward 1	210	314	20,853	20,539
Ward 2	92	326	2,472	2,146
Ward 3	90	386	1,548	1,162
Ward 4	29	17	432	415
Ward 5	61	372	1,513	1,141
Ward 6	88	820	1,958	1,138
Ward 7	82	346	1,414	1,068
Total	652	2,581	30,190	27,609

Source: City of Riverside 2021.

Rezoning of the opportunity sites would also result in non-residential development in those areas to be designated as mixed-use. Mixed-use zones include:

- Mixed-Use Urban (MU-U/MU-U-TA*);
- Mixed-Use Village (MU-V/MU-V-TA*);

* The TA designation means Transit Adjacent applies to parcels within 0.5 mile of a transit stop and provides a density bonus.

Table 3 summarizes the total amount of residential and non-residential square footage and number of housing units that could be developed in the proposed mixed-use zones. Table 4 summarizes the potential development by Ward.

Table 3. Potential Development in Mixed-Use Zones

Development Type	Percent	Total square feet	# Residential Units
Non-Residential	25%	2,833,310	
Residential	35%	3,966,633	
Mixed use ¹	40%	4,533,295	
Total		11,333,238	10,124²

¹ Includes both residential (80%) and non-residential (20%).

² Assumes average unit size of 1,025 square feet.

Source: City of Riverside 2021.

Table 4. Total Residential and Non-Residential Development in Mixed-Use Zones by Ward

Ward	Total Residential (# DU)	Total Non-Residential (SF)
1	381	140,869
2	3,186	1,177,118
3	679	251,007
4	557	205,983
5	1,929	712,738
6	1,941	717,230
7	1,448	535,023

Source: City of Riverside 2021.

5.0 OTHER PUBLIC AGENCIES WHOSE REVIEW OR APPROVAL IS REQUIRED

- **California Department of Housing and Community Development (HUD)** will approve the Housing Element update prior to its adoption.
- **California Geological Survey of the Department of Conservation** will review the Public Safety Element Update prior to its adoption.
- **State Board of Forestry and Fire Protection** will review the Public Safety Element prior to its adoption.
- **City of Riverside Fire Department** will review the Public Safety Element Update prior to its adoption.
- **County of Riverside Fire Department** will review the Public Safety Element Update prior to its adoption.

6.0 AB 52/SB 18 CONSULTATION

The City will send out Assembly Bill (AB) 52 consultation notices to tribes to initiate consultation. For previous projects, the following California Native American tribes have requested consultation with the City pursuant to Public Resources Code 21080.3.1:

- Gabrieleno Band of Mission Indians–Kizh Nation
- Soboba Band of Luiseño Indians
- Cahuilla Band of Indians
- Pechanga Cultural Resources Department
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- Morongo Band of Mission Indians
- Agua Caliente Band of Cahuilla Indians
- San Gabriel Band of Mission Indians

SB 18 consultation notices will also be sent out. The results of the consultations will be included in the forthcoming EIR.

7.0 OTHER ENVIRONMENTAL REVIEWS INCORPORATED BY REFERENCE IN THIS REVIEW

- *Riverside General Plan 2025*
- GP FPEIR
- City of Riverside Housing Element Update EIR
- Title 19, Zoning Code
- Title 20, Cultural Resources

8.0 ENVIRONMENTAL IMPACT REPORT

The City of Riverside will prepare an EIR in compliance with CEQA. The EIR will consider the proposed Project and a reasonable range of alternatives. A detailed description of the proposed Project and alternatives will be included in the EIR. It is anticipated that several alternatives will be considered, which may include alternatives that vary by the level of density proposed or housing types, or a combination of these factors.

CEQA generally requires analysis of a No Project Alternative (i.e., the environmental impacts of continuing existing conditions). As such, the No Project Alternative would include what would be reasonably expected to occur in the foreseeable future, if the proposed Project were not approved, based on current plans and consistent with available infrastructure and community services. The following alternatives will be considered in the forthcoming EIR along with the proposed Project.

- **No Project Alternative.** No changes to existing zoning or allowed development on preliminary opportunity sites would occur. This scenario would not meet the City's RHNA goal of 24,000 units.
- **Dispersed Growth Alternative.** Housing development would be spread more widely across almost all opportunity sites, generally at lower densities, resulting in less intensive but more widespread land use changes. This scenario would exceed the City's goal of 24,000 RHNA units.
- **Focused Growth Alternative.** Housing development is limited to strategic locations with superior access to transportation, employment, services, and amenities, generally at higher densities and more intensive land use changes. This scenario would also exceed the City's RHNA goal of 24,000 units.
- **Limited Opportunity Sites.** This alternatives would involve selection of a reduced number of the identified opportunity sites on which to locate future housing development, focused on meeting but not exceeding the RHNA allocation.

8.1 Potential Environmental Effects

The proposed Project would include updates to the Housing and Public Safety Elements, addition of environmental justice policies, and Zoning Code and Specific Plan Amendments to accommodate SCAG's RHNA allocation. This would result in facilitating development on up to on up to 725.1 acres within the City and its SOI (501.3 acres of which would be a result of rezoning) and could accommodate housing. Preliminary analysis has identified several environmental resources for which environmental impacts are anticipated to be less than significant or for which little to no effect would occur. These topics will not require detailed analysis but will be discussed in the EIR with rationale supporting their dismissal.

These resources are anticipated to include:

- Aesthetics
- Agriculture and Forestry Resources
- Energy
- Geology, Soils
- Hydrology and Water Quality
- Mineral Resources
- Wildfire

Preliminary analysis also identified several environmental resources for which environmental impacts would be potentially significant. The EIR will focus on disclosing these significant and potentially significant effects of the proposed Project and the EIR alternatives on these various environmental resources:

- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Paleontological Resources

For each issue listed above, the EIR section will include discussions of environmental setting, regulatory framework, environmental effects, and mitigation for significant impacts. The direct, indirect, and cumulative effects of the Project will be considered. For potentially significant impacts, the EIR will identify mitigation measures, where feasible, to reduce these impacts to the extent possible. Per Section 15082(a)(1)(C) of the State CEQA Guidelines related to the contents of an NOP, the discussions below identify probable environmental effects of the proposed Project.

8.2.1 Air Quality

The City is in the South Coast Air Basin (SCAB), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAB is currently classified as nonattainment area for the federal and State ozone (O₃) standards and particulate matter (PM) less than or equal to 2.5 microns (PM_{2.5}) standards, and a nonattainment area for the PM less than or equal to 10 microns (PM₁₀) State standards (U.S. Environmental Protection Agency 2020; SCAQMD 2016). Implementation of the proposed Project and associated development may conflict with or obstruct implementation of the applicable air quality plan, result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard, or expose sensitive receptors to substantial pollutant concentrations. Impacts related to air quality resources for these thresholds will be analyzed in detail in the EIR.

8.2.2 Biological Resources

The majority of the undeveloped lands, open space, and conserved lands are located along the northern border of the City along the Santa Ana River corridor and in the undeveloped foothills, canyons, arroyos, and mountains of Sycamore Canyon Park, Mockingbird Canyon, and Alessandro Heights in the southern and eastern portions of the City. These open space areas contain native riparian, grassland, and scrubland habitats that support many native plants and animals, including special-status species and sensitive natural communities.

Implementation of the proposed Project and associated development could 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 U.S. Fish and Wildlife Service; have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means; interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; or conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Impacts related to biological resources for these thresholds will be analyzed in detail in the EIR.

8.2.3 Cultural Resources

The City and SOI contain numerous archaeological and historical resources. Implementation of the proposed Project and associated development could cause a substantial adverse change in the result of a historical or archaeological resource. Impacts related to cultural resources for these thresholds will be analyzed in detail in the EIR.

8.2.4 Greenhouse Gas Emissions

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of greenhouse gases (GHGs) in the atmosphere. Rising atmospheric concentrations of GHGs in excess of natural levels result in increasing global surface temperatures—a phenomenon commonly referred to as *global warming*. The primary associated GHG emissions are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluoridated compounds. Implementation of the proposed Project and associated development could generate GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Impacts related to GHG emissions will be analyzed in detail in the EIR.

8.2.5 Hazards and Hazardous Materials

A review of the State Water Resources Control Board's Geotracker and the Department of Toxic Substances Control's Envirostor of hazardous materials sites listed within the City identified multiple hazardous material cleanup sites including: Leaking Underground Storage Tank (LUST) Cleanup Sites, Cleanup Program Sites, Military Cleanup and Underground Storage Tank Sites, and Department of Toxic Substances Control Cleanup Sites throughout the City. Implementation of the proposed Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions or through hazardous emissions, or the site could be located on a hazardous materials cleanup site. Impacts related to hazards and hazardous materials will be analyzed in detail in the EIR.

8.2.6 Land Use and Planning

The proposed Project would involve Zoning Code amendments to accommodate housing needs. These zoning changes could cause a significant environmental impact due to a physical division of an established community or conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts related to land use conflicts will be analyzed in detail in the EIR.

8.2.7 Noise

The proposed Project would facilitate an increase to the housing stock throughout the City and potentially new public safety facilities. Therefore, the geographic scope of the proposed Project is extensive and could be surrounded by other noise-sensitive land uses as well as many of the noise sources. The Project could generate a substantial temporary or permanent increase in ambient noise levels, generate excessive groundborne vibration or noise, or be located within 2 miles of a public use airport. Impacts related to noise will be analyzed in detail in the EIR.

8.2.8 Population and Housing

Due to the rezoning of sites, there is a potential increase of up to approximately 29,863 new housing units between 2021 and 2029. Based on the City's current Housing Element, the average household size is 3.28 persons per du. The rezoning of opportunity sites has the potential to increase the City's population, which could exceed planned growth. Impacts related to population and housing and exceedance of planned growth will be analyzed in detail in the EIR.

8.2.9 Public Services

Implementation of the proposed Project and associated development could result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection, police protection, parks, schools, or library facilities in order to maintain acceptable service ratios or other performance objectives. Impacts related to public services will be analyzed in detail in the EIR.

8.2.10 Recreation

The proposed Project would allow build-out of additional housing, which would result in an increase in resident population. While the parks-to-population ratio may still meet City goals with this population increase, deterioration of existing parks and recreational facilities may occur in localized areas. In addition, the increase in population may result in the need for construction of new parks or recreation facilities, the construction of which could result in significant environmental impacts. Impacts related to recreation will be analyzed in detail in the EIR.

8.2.11 Transportation

The existing roadway network, bikeways, and local transit services, and planned roadway, bikeway, and transit improvements in the area are described in the *Riverside General Plan 2025*, Circulation and Community Mobility Element and in the Draft Existing Conditions Riverside Housing Element Update, Transportation section. Impacts related to transportation will be analyzed in detail in the EIR.

8.2.12 Tribal Cultural Resources

The project area is near an ethnographic transition zone between various Native American tribes. Implementation of the proposed Project and associated development could 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. Impacts on tribal cultural resources will be analyzed in detail in the EIR.

8.2.13 Utilities and Service Systems

The proposed Project and associated development would result in increased development densities. Individual Projects under the proposed Project could require relocation or construction of new utility infrastructure, result in insufficient water supply or wastewater conveyance and

treatment capacity, or generate solid waste in excess of State or local standards or exceeding capacity of local infrastructure. Impacts related to utilities and service systems will be analyzed in detail in the EIR.

8.2.14 Paleontological Resources

The County of Riverside Paleontological Sensitivity Model shows that most of the area within the city limits contains geologic units with High A, High B, or Undetermined paleontological sensitivity, with a minority containing geologic units with Low paleontological sensitivity. Because the opportunity sites under the proposed Project are situated throughout the City, it is likely that some of these sites are located on geologic units with High A, High B, or Undetermined paleontological sensitivity. Depending on the location and depth of ground disturbance, proposed operations could disturb previously unknown significant fossils, potentially damaging or destroying such fossils. This impact is potentially significant and will be analyzed in detail in the EIR.

9.0 PROPOSED DISCRETIONARY ACTIONS/ REQUIRED APPROVALS

The following entitlements are required for the proposed Project:

- General Plan Text Amendment (GPA) to amend the Housing and Public Safety Elements of the General Plan 2025 (case DP-2021-00475)
- General Plan Map Amendment (GPA) to change the Land Use designation of up to 652 acres (case DP-2021-00476)
- Zoning Code Text Amendment to amend Title 19 (case DP-2021-00479)
- Zoning Code Map Amendment to rezone 652 acres (case DP-2021-00480)
- Specific Plan Amendment to change land use designation and boundaries in seven Specific Plans to accommodate future housing (case DP-2021-00478)
- EIR for the proposed Project (case DP-2021-00481)



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April 2, 2021

Date

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Figure 1
Regional Vicinity Map

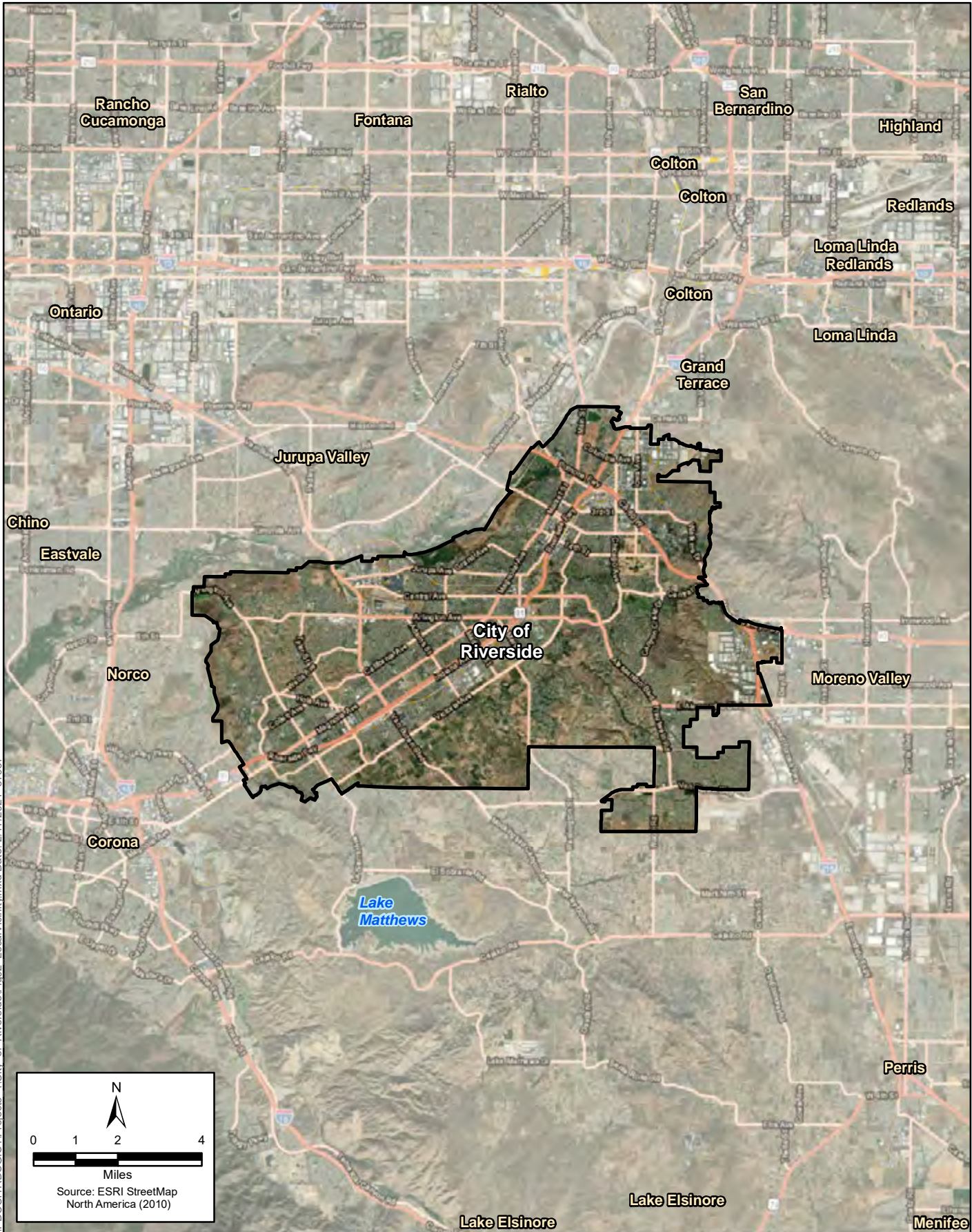


Figure 2
Local Vicinity Map

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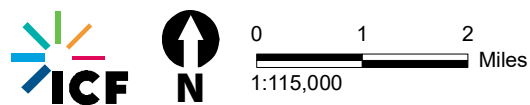
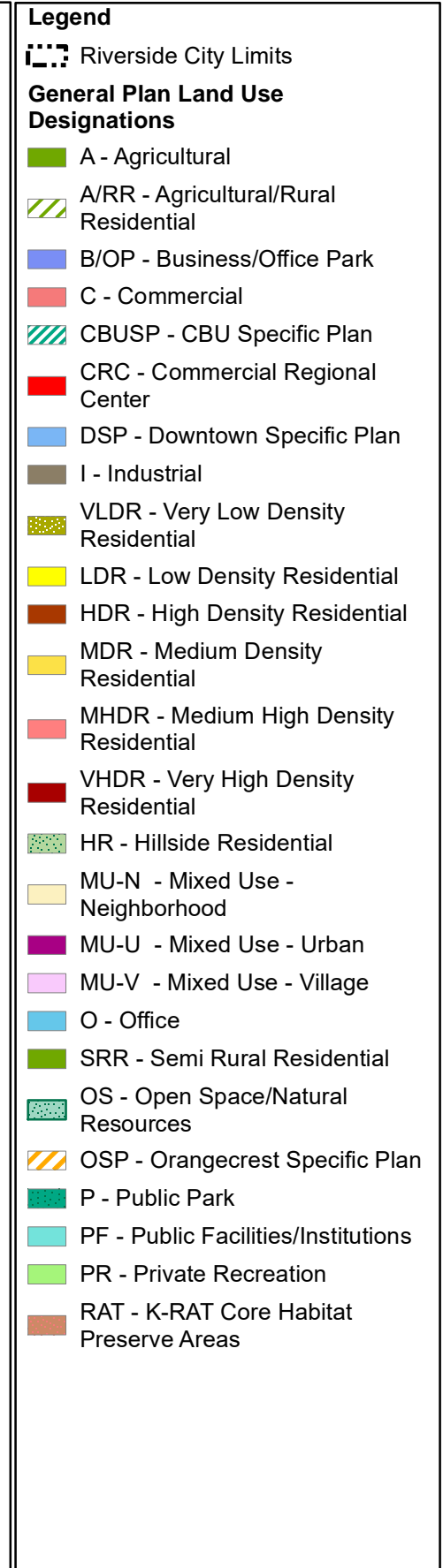
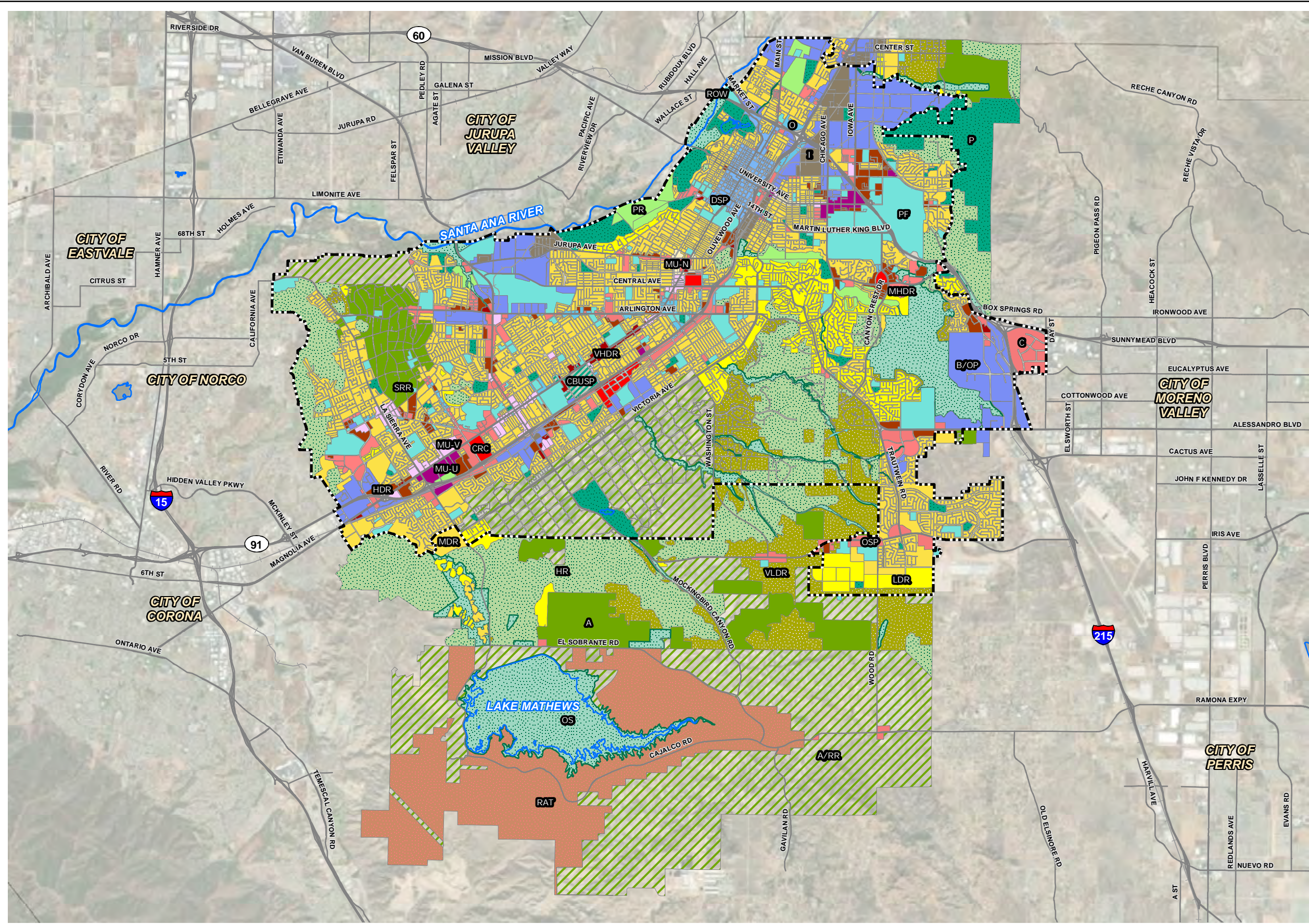
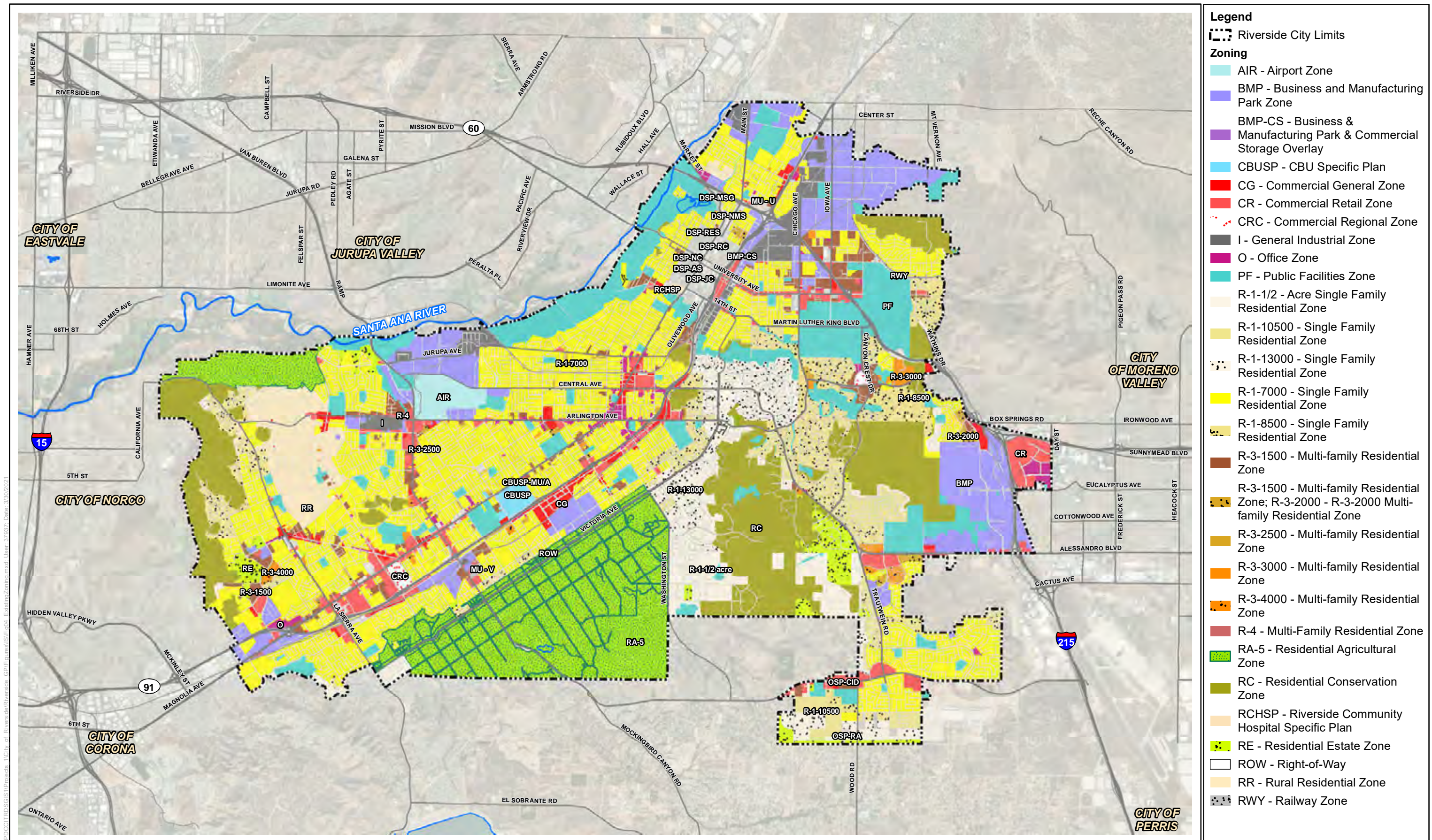


Figure 3
General Plan Land Use Designations
Riverside General Plan Update

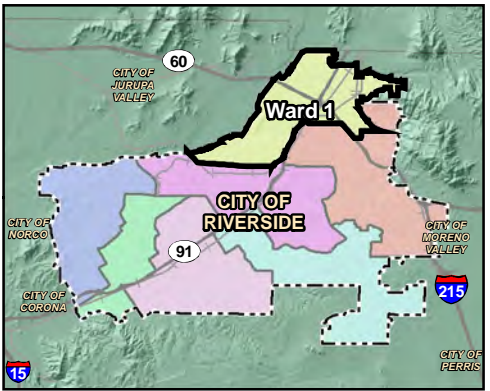
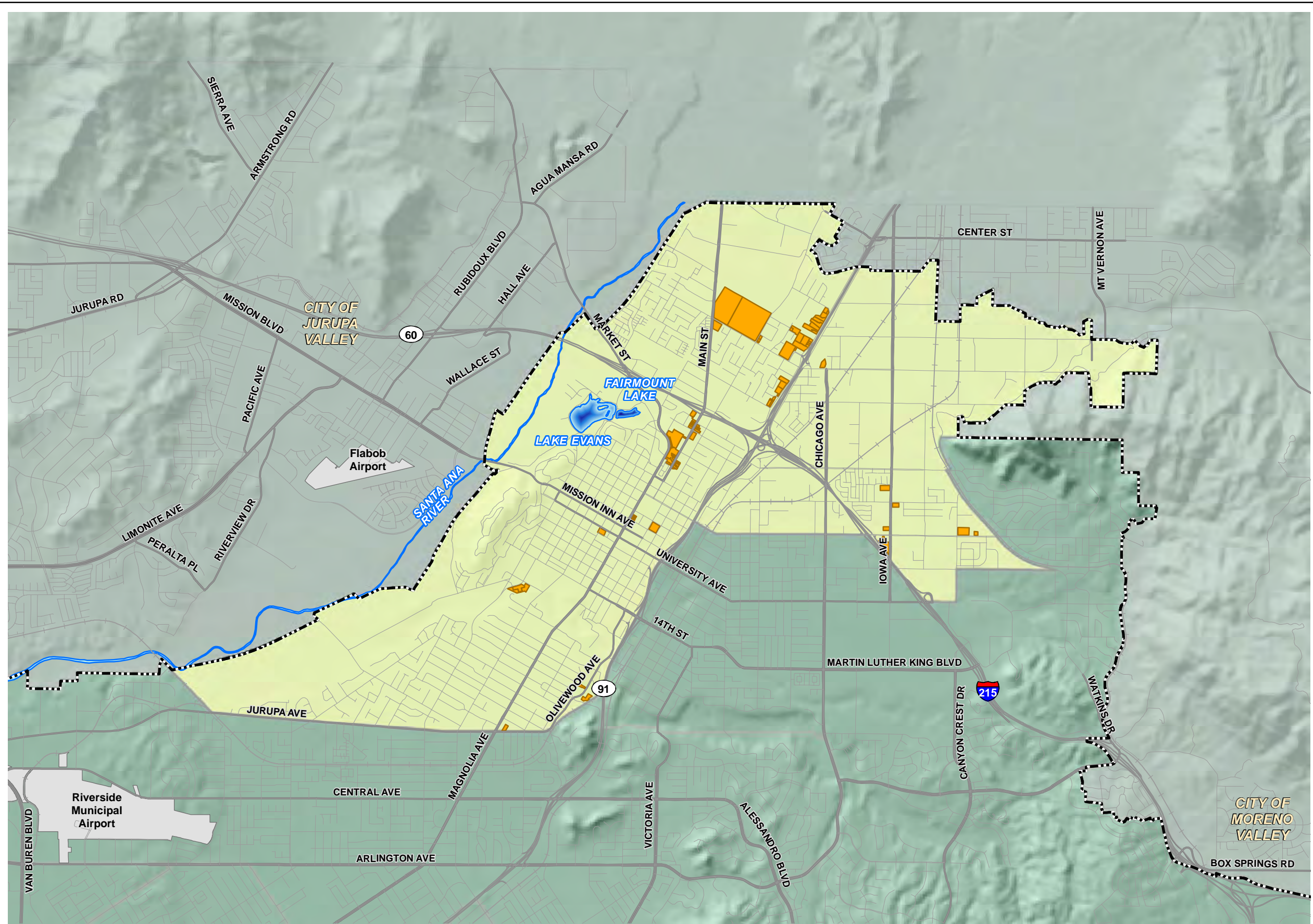


- Legend**
- Riverside City Limits
 - Zoning**
 - AIR - Airport Zone
 - BMP - Business and Manufacturing Park Zone
 - BMP-CS - Business & Manufacturing Park & Commercial Storage Overlay
 - CBUSP - CBU Specific Plan
 - CG - Commercial General Zone
 - CR - Commercial Retail Zone
 - CRC - Commercial Regional Zone
 - I - General Industrial Zone
 - O - Office Zone
 - PF - Public Facilities Zone
 - R-1-1/2 - Acre Single Family Residential Zone
 - R-1-10500 - Single Family Residential Zone
 - R-1-13000 - Single Family Residential Zone
 - R-1-7000 - Single Family Residential Zone
 - R-1-8500 - Single Family Residential Zone
 - R-1-8500 - Single Family Residential Zone
 - R-3-1500 - Multi-family Residential Zone
 - R-3-1500 - Multi-family Residential Zone; R-3-2000 - R-3-2000 Multi-family Residential Zone
 - R-3-2500 - Multi-family Residential Zone
 - R-3-3000 - Multi-family Residential Zone
 - R-3-4000 - Multi-family Residential Zone
 - R-4 - Multi-Family Residential Zone
 - RA-5 - Residential Agricultural Zone
 - RC - Residential Conservation Zone
 - RCHSP - Riverside Community Hospital Specific Plan
 - RE - Residential Estate Zone
 - ROW - Right-of-Way
 - RR - Rural Residential Zone
 - RWY - Railway Zone



Figure 4
Existing Zoning
Riverside General Plan Update

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- Legend**
- Riverside City Limits
 - Ward 1
 - Opportunity Sites**
 - No Zone Changes

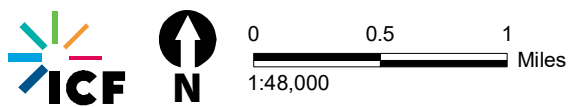
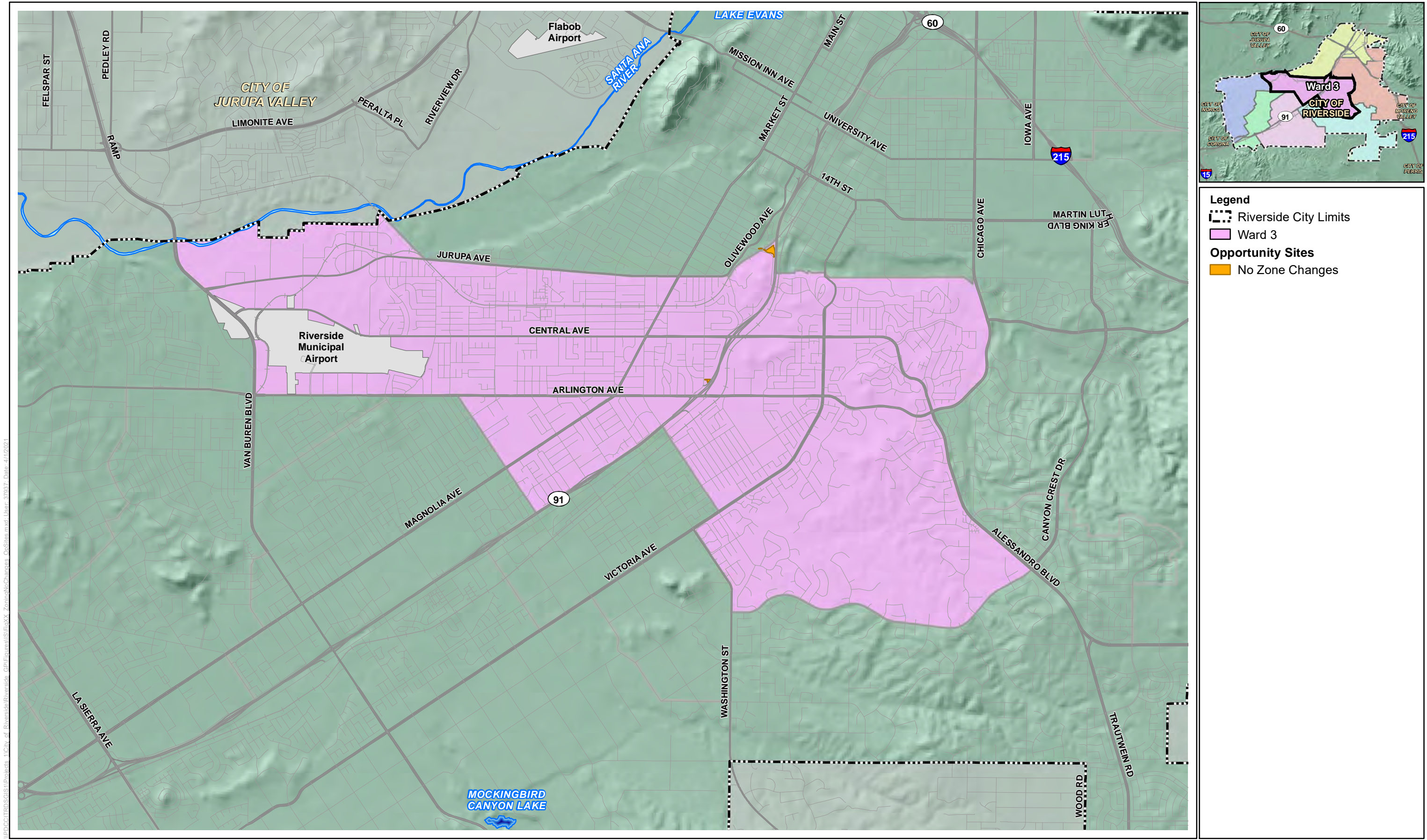
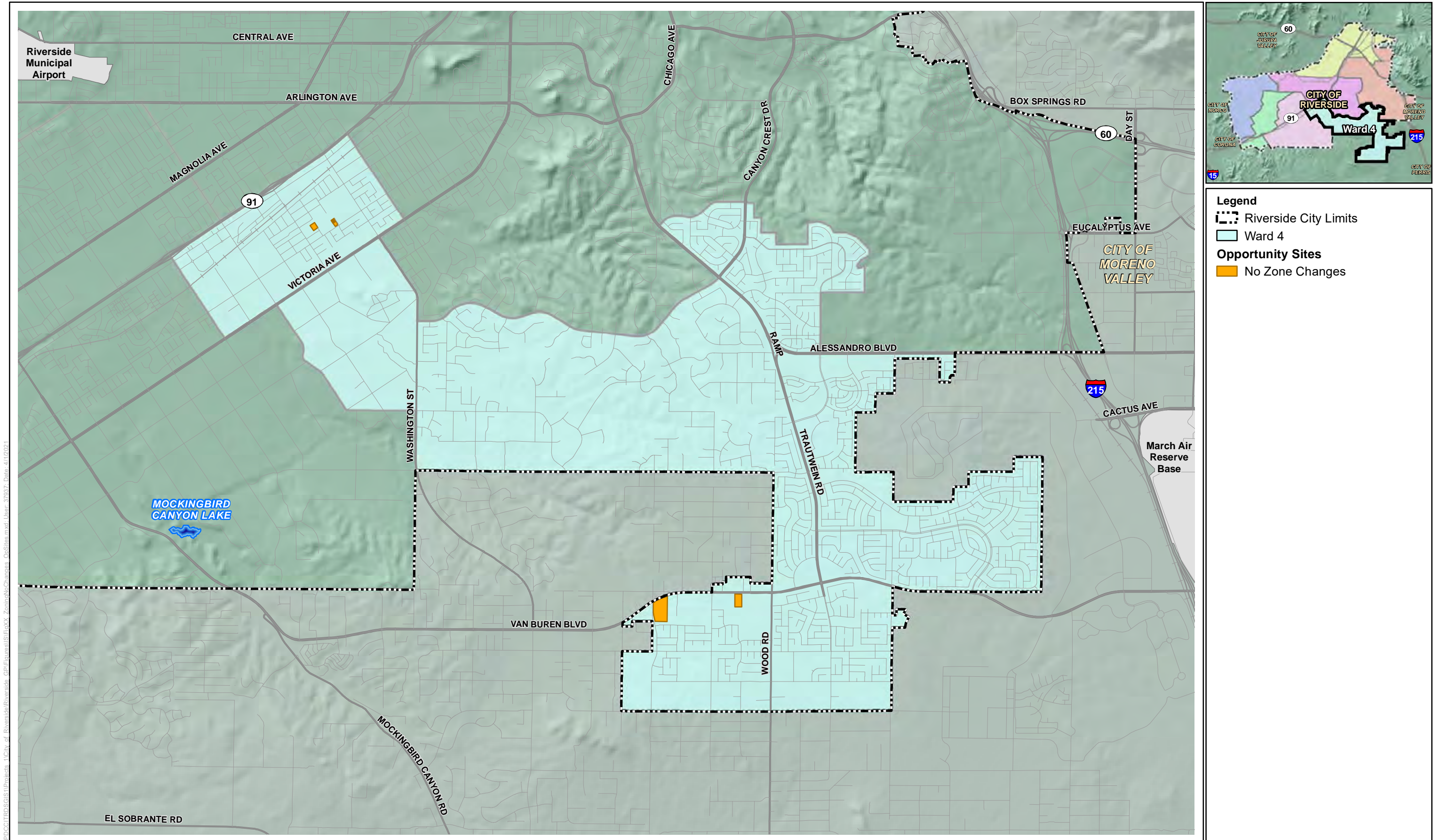


Figure 5
Ward 1 - Opportunity Sites with No Zoning Changes
Riverside General Plan Update



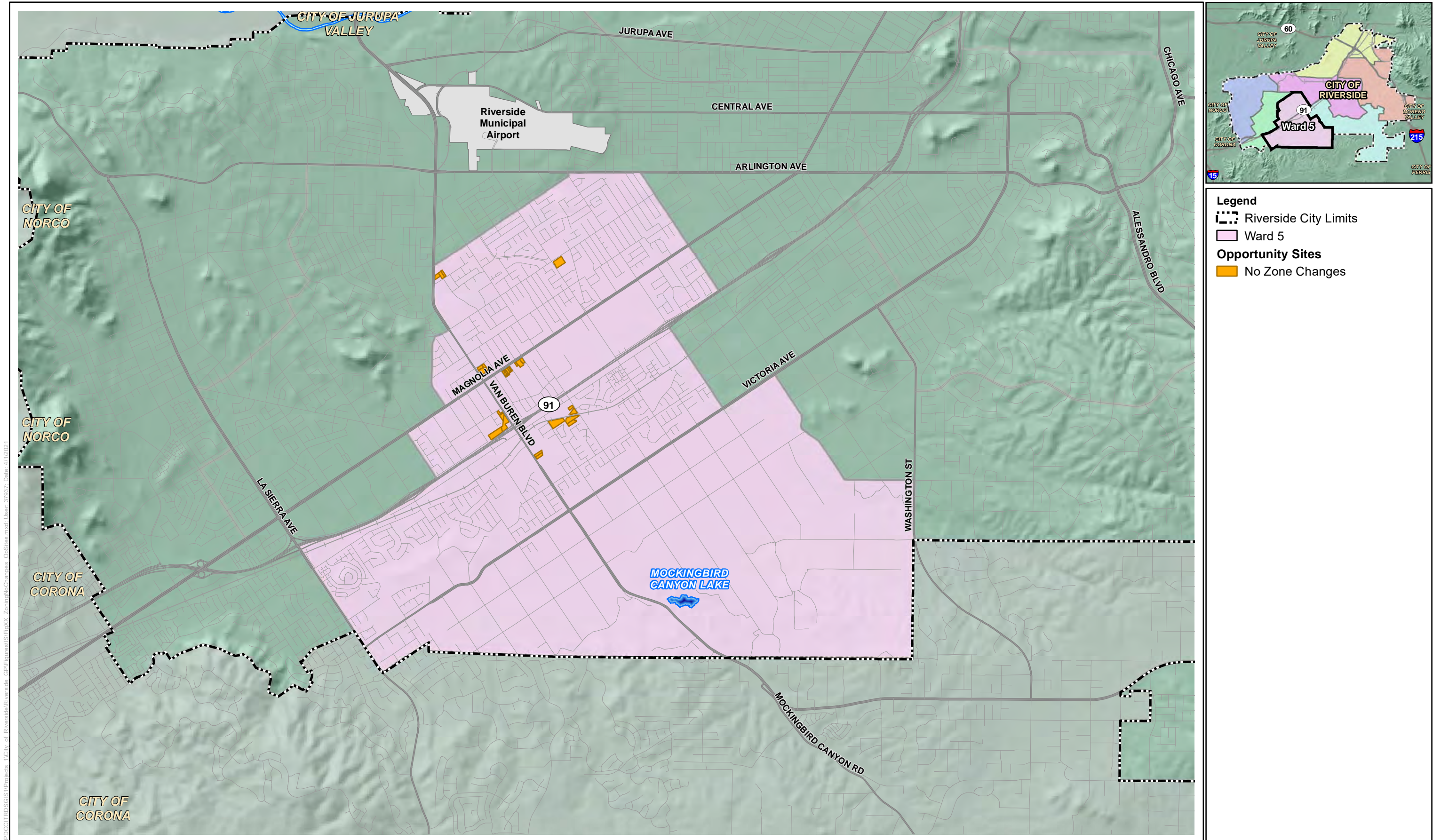
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Figure 7
Ward 3 - Opportunity Sites with No Zoning Changes
Riverside General Plan Update



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Figure 8
Ward 4 - Opportunity Sites with No Zoning Changes
Riverside General Plan Update



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Figure 9
Ward 5 - Opportunity Sites with No Zoning Changes
Riverside General Plan Update

