

City of Riverside

# HOUSING AND PUBLIC SAFETY ELEMENT UPDATES AND ENVIRONMENTAL JUSTICE POLICIES

DRAFT ENVIRONMENTAL IMPACT REPORT

State Clearinghouse No. 2021040089

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## Acronyms and Abbreviations

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μPa	micropascals
°F	degrees Fahrenheit
SAFE	Safer Affordable Fuel-Efficient
A/RR	Agricultural/Rural Residential
AB	Assembly Bill
ACM	asbestos-containing material
ACS	American Community Survey
AF	acre-feet
AFY	acre-feet per year
AIA	Airport Influence Area
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ATP	Archaeological Treatment Plan
AUSD	Alvord Unified School District
B.P.	before present
Basin	South Coast Air Basin
BMP	best management practice
BNSF	BNSF Railway
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Cal/EPA	California Environmental Protection Agency
Cal/OSHA	California Division of Occupational Safety and Health
CalEnviroScreen	California Communities Environmental Health Screening Tool
CALGreen	California Green Building Standards Code
Cal-ICP	California Invasive Plant Council
Caltrans	California Department of Transportation
CalVeg	Classification and Assessment with Landsat of Visible Ecological Groupings
CAP	<i>Economic Prosperity Action Plan and Climate Action Plan</i>
CARB	California Air Resources Board
CBC	California Building Code
CBSC	California Building Standards Code
CBU	California Baptist University
CBUSP	CBU Specific Plan Zone
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEHC	California Essential Habitat Connectivity Project
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act

CESA	California Endangered Species Act
CFC	California Fire Code
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CH <sub>4</sub>	methane
CIP	Capital Improvement Program
City	City of Riverside
CIWMP	Countywide Integrated Waste Management Plan
CMP	Congestion Management Program
CMS	Congestion Management System
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
Construction General Permit	National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction Activity
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DAMP	Drainage Area Management Plan
dB	decibel
dBA	A-weighted decibel
DOF	California Department of Finance
DPM	diesel particulate matter
DSP	Downtown Specific Plan
DTSC	Department of Toxic Substances Control
DU	dwelling unit
DU/AC	dwelling unit per acre
ECA	Essential Connectivity Area
EIR	environmental impact report
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Environmentally Sensitive Area
FAR	floor-area ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FR	Federal Register
GHG	greenhouse gas
GIS	geographic information system
GP 2025	<i>Riverside General Plan 2025</i>

GP FPEIR	General Plan and Supporting Documents Final Program Environmental Impact Report
GWP	global warming potential
HCP	habitat conservation plan
HDR	High Density Residential
HFCs	hydrofluorocarbons
HMBP	hazardous materials business plan
“Hot Spots” Act	Air Toxics “Hot Spots” Information and Assessment Act of 1987
HOV	high-occupancy vehicle
HR	Hillside Residential
HRA	health risk assessment
HVAC	heating, ventilating, and air conditioning
Hz	Hertz
I-	Interstate
in/s	inches per second
IPCC	Intergovernmental Panel on Climate Change
ISO	Insurance Services Office
ITP	Incidental Take Permit
kHz	kilohertz
kV	kilovolt
LCFS	low-carbon fuel standard
L <sub>dn</sub>	day/night noise level
LDR	Low Density Residential
L <sub>eq</sub>	equivalent noise level
LID	low impact development
L <sub>max</sub>	maximum sound level
L <sub>min</sub>	minimum sound level
LOS	level of service
LST	Localized Significance Threshold
LT	long-term
LUST	leaking underground storage tank
M	magnitude
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MDR	Medium Density Residential
MERV	Minimum Efficiency Report Value
mgd	million gallons per day
MHDR	Medium-High Density Residential
MPO	Metropolitan Planning Organization
MRZ	mineral resource zone
MS4	Municipal Separate Storm Sewer System
MSHCP	multiple-species habitat conservation plan
MTCO <sub>2e</sub>	metric tons of carbon dioxide equivalent
MTCO <sub>2e</sub> /SP	metric tons of carbon dioxide equivalent per service population



MU-N	Mixed-Use – Neighborhood
MU-U	Mixed-Use – Urban
MU-V	Mixed-Use – Village
MVUSD	Moreno Valley Unified School District
N <sub>2</sub> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NHTSA	National Highway Traffic Safety Administrative
NMFS	National Marine Fisheries Service
NNL	National Natural Landmarks
NO	nitric oxide
NO <sub>2</sub>	nitrogen dioxide
NOP	Notice of Preparation
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O <sub>3</sub>	ozone
OPR	Office of Planning and Research
PACT	Pedestrian Target Safeguarding Plan, Active Transportation Plan, a Complete Streets Ordinance, and a Trails Master Plan
Parks Master Plan	<i>City of Riverside Comprehensive Park, Recreation &amp; Community Services Master Plan</i>
Pb	lead
PFCs	perfluorinated carbons
PM	particulate matter
PM <sub>10</sub>	particulate matter 10 microns or smaller in diameter
PM <sub>2.5</sub>	particulate matter 2.5 microns or smaller in diameter
Porter-Cologne	Porter-Cologne Water Quality Control Act
ppm	part per million
PPV	peak particle velocity
PQP	Public/Quasi-Public
PRC	Public Resources Code
Project	Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Project
RCA	Regional Conservation Authority
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission
RFD	Riverside Fire Department
RHNA	Regional Housing Needs Assessment

RIVTAM	Riverside County Traffic Analysis Model
RMC	Riverside Municipal Code
RPD	Riverside Police Department
RPL	Riverside Public Library
RPS	Renewables Portfolio Standard
RPU	Riverside Public Utilities
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RTRP	Riverside Transmission Reliability Project
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
RWQCP	Riverside Regional Water Quality Control Plant
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SEMS	Standardized Emergency Management System
SF <sub>6</sub>	sulfur hexafluoride
SIP	State Implementation Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SLCP	Short-Lived Climate Pollutant
SO <sub>2</sub>	sulfur dioxide
SoCalGas	Southern California Gas Company
SOI	Sphere of Influence
SOI Standards	Secretary of the Interior's Standards for Rehabilitation
SO <sub>x</sub>	sulfur oxides
SPA	Specific Plan area
SR-	State Route
SRR	Semi-Rural Residential
SRTS	Safe Routes to School
ST	short-term
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
Tanner Act	Toxic Air Contaminant Identification and Control Act
TCR	tribal cultural resource
TDM	Transportation Demand Management
TNW	traditional navigable water
UCR	University of California, Riverside

USACE	U.S. Army Corps of Engineers
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
UWMP Act	Urban Water Management Plan Act
VHDR	Very High Density Residential
VLDR	Very Low Density Residential
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	waste discharge requirement
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan
WRC MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
WRCOG	Western Riverside Council of Governments
WRCRWA	Western Riverside County Regional Wastewater Authority



# Executive Summary

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As stated in the California Environmental Quality Act (CEQA) Guidelines § 15123, “Summary,” an environmental impact report (EIR) must contain a brief summary of the proposed action and its consequences. The summary must identify each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect, areas of controversy known to the lead agency including issues raised by agencies and the public, and issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

This Executive Summary complies with State CEQA Guidelines § 15123. This Draft EIR includes a description of the proposed Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Project (Project) and evaluates the physical environmental effects that could result from the Project’s implementation. The City of Riverside (City) determined that the scope of this EIR should cover the entire City.

The Project would include (1) adopting and implementing an update of the Housing Element for the 2021–2029 planning period; (2) adopting and implementing a Public Safety Element Update; (3) developing associated Environmental Justice Policies; and (4) updating the Zoning Code and Specific Plans to address the requirements of the 6<sup>th</sup> Regional Housing Needs Assessment (RHNA) cycle. The Project is intended to accommodate the City’s RHNA obligation of 18,458 dwelling units (DUs), plus approximately 30 percent (approximately 5,500 DUs) to comply with Senate Bill 166 (No Net Loss) requirements, for an overall goal of 24,000 DUs.<sup>1</sup>

The Project involves 239 acres that do not require zoning changes and 581 acres that would require general plan amendments, Zoning Code changes, and Specific Plan amendments, for a total of 870 parcels comprising 820 acres. The implementation of this Project could result in an increase of 31,564 new DUs<sup>2</sup> and 3,181,930 square feet of nonresidential development, or up to 31,175 dwelling units and 1,433,460 square feet over existing conditions.

This Draft EIR, having California State Clearinghouse No. 2021040089, was prepared in accordance with State CEQA Guidelines Article 9, § 15120 to § 15132, to evaluate the potential environmental impacts associated with planning, constructing, and operating the Project. This EIR does not recommend approval, approval with modification, or denial of the Project; rather, this EIR is a source of factual information regarding potential impacts that the Project may cause to the physical environment. The Draft EIR will be available for public review for a period of 45 days.

## ES.1 Project Location and Setting

The 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

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<sup>1</sup> For the purposes of RHNA, assumes that sites identified for housing development are developed to 75 percent of maximum zoned capacity.

<sup>2</sup> For the purposes of CEQA, assumes that sites identified for housing development are developed to 75 percent of maximum zoned capacity.

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, a major regional freeway, traverses the City in an east-west orientation, while State Route 60 and Interstate 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 ES-1 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, and 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.

The Housing and Public Safety Elements are citywide planning documents associated with *Riverside General Plan 2025 (GP 2025)*. A component of the Housing Element Update is a rezoning program that involves multiple sites identified for future housing development and Specific Plan amendments at various locations in all parts of the City. Environmental Justice Policies are an additional component of the Project. The geographic setting for the Project is the entire City.

## ES.1.1 Background

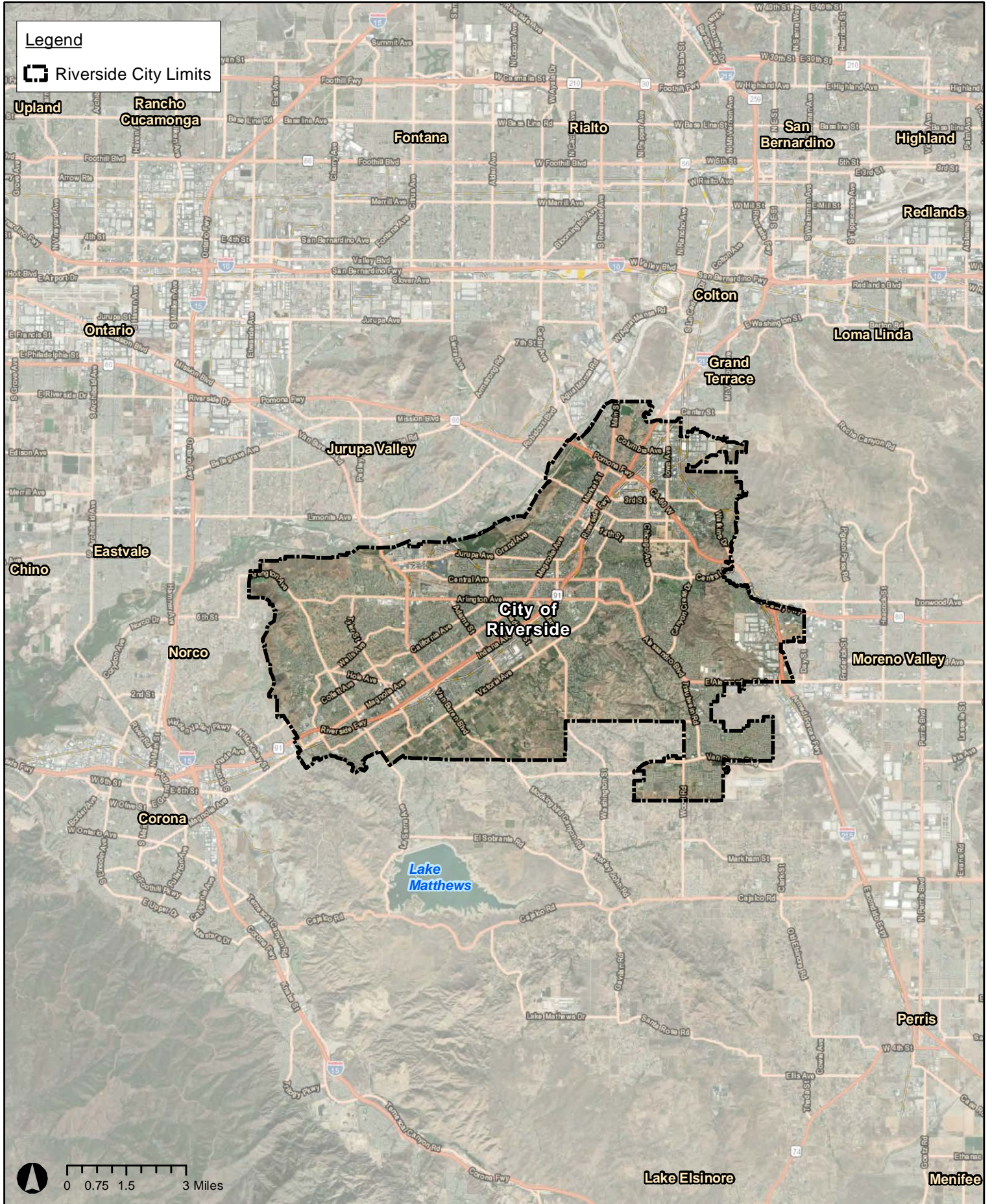
The City has a population of approximately 324,302 persons as of January 2021 (Department of Finance 2021). In the City's recent history, population growth has been constant, adding approximately 40,000 new residents each decade since the 1960s. Past growth has been fueled by the City's attractive housing market due to its historically 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*, the City has a projected population of 383,077 persons at general plan build-out (2025), including 346,867 persons within City limits and 36,210 persons within the City's SOI (City of Riverside 2007). According to the Southern California Association of Governments, the City's population is projected to increase to 395,800 by 2045 (SCAG 2020).

## ES.1.2 Regional Housing Needs Assessment

The statewide 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 2017 as a mid-5<sup>th</sup> cycle revision.

Figure ES-1  
Local Vicinity Map







The Housing Element cycle covering the 2013–2021 period included an RHNA obligation of 8,283 units, of which only a portion were built during the last 8 years. The City’s previous Housing Element was adopted in 2017 and runs through 2021. This update cycle comes when California faces a major statewide housing shortage that is affecting all Californians by raising the price of housing and the cost of construction, and by increasing homelessness. In the 2021–2029 Housing Element cycle (6<sup>th</sup> cycle), the City’s RHNA obligation is a minimum of 18,458 new DUs. Given that 100 percent of potential housing sites will likely not be developed to full potential, the City has provided a buffer of approximately 5,500 DUs (approximately 30 percent over and above the RHNA obligation). Altogether, the City will identify space for up to 24,000 new homes for the 2021–2029 RHNA cycle.

## ES.2 Project Overview

The Project consists of several components: Housing Element Update, Public Safety Element Update, GP 2025 amendments, Zoning Code amendments, and several Specific Plan amendments. Environmental Justice Policies will be included in both element updates. Details concerning each of these components are discussed below.

### ES.2.1 Housing Element Update

The Housing Element Update addresses changes that have occurred since adoption of the 5<sup>th</sup> cycle (2014–2021) Housing Element. These changes include updated demographic information, housing needs data, and analysis of the availability sites for potential future housing development (Opportunity Sites). The locations of available Opportunity Sites in the Housing Element have been updated to identify sites that accommodate the City’s RHNA for the 2021–2029 planning period (6<sup>th</sup> cycle). The Project would also amend the GP 2025 land use and Specific Plan designations and rezone sites to accommodate the changes specified in the Housing Element Update.

The Housing Element identifies policies and actions that focus on:

- Matching housing supply with need
- Maximizing housing choice throughout the community
- Assisting in providing affordable housing
- Removing governmental and other constraints to housing production
- Promoting fair and equitable housing opportunities for all

The main components of the Housing Element Update are required by Government Code Section 65583 and 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 policies and actions, and a full list of programs that will help the City carry out the policies

- A list of Opportunity 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. As part of the analysis, 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 and arroyos; or
- Of known soil or groundwater contamination.

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

Because the Housing Element is updated every 8 years, the 5<sup>th</sup> cycle Housing Element provides a foundation for this 6<sup>th</sup> 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.

## ES.2.2 Public Safety Element Update

The Project also includes an update to the Public Safety Element to incorporate information on natural and human-caused hazards, along with new policies related to environmental justice, climate change, and pandemic preparedness and response, among others. The purpose of the 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 material spills, crime reduction, and response to global pandemics like COVID-19—are 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 GP 2025. 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 include methods for minimizing risks, as well as ways to minimize economic disruption and speed up recovery following disaster. The

City's updated Public Safety Element identifies public safety issues and needs anticipated to be of ongoing concern to people in the City and 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.

## ES.2.3 Environmental Justice Policies

The Project includes a series of proposed GP 2025 policies and implementing actions that promote environmental justice within the City. As defined by the U.S. Environmental Protection Agency (2021), *environmental justice* is “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of laws, regulations, and policies.” The need to promote environmental justice within and beyond California’s communities has arisen out of a history of disproportionate environmental harm borne by low-income and minority populations due to compounded exposure to environmental hazards, often leading to adverse health outcomes and compromised quality of life.

Senate Bill 1000 amended California Government Code Section 65302 to require that both cities and counties that have environmental justice communities, as defined, incorporate environmental justice policies into their general plans, either in a separate environmental justice element or by integrating related goals, policies, and objectives throughout the other elements upon the adoption or next revision of two or more elements concurrently. The purpose of the legislation is to address the “unique or compounded health risks” in environmental justice communities by decreasing pollution exposure, increasing community assets, and improving overall health. To address disproportionate effects and to comply with Senate Bill 1000, policies and actions are incorporated within each element of GP 2025, with the goal of affording affected communities an equal level of protection from environmental and health hazards and enhanced opportunities to engage in decision-making that affects environmental quality and health outcomes.

Environmental justice communities are those communities that fit either of the definitions below:

- Areas identified by the California Environmental Protection Agency as “(1) areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation”; or “(2) areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment” (California Code, Health and Safety Code Section 39711)
- Low-income areas that are “disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation” (Gov. Code, § 65302, subdivision (h)(4)(A))

Environmental justice communities within the City were identified using the California Communities Environmental Health Screening Tool (CalEnviroScreen), a data tool developed by the California Environmental Protection Agency’s Office of Environmental Health Hazard Assessment pursuant to Health and Safety Code Section 39711 and other statutory requirements. CalEnviroScreen provides statewide data that can be used to identify communities disproportionately affected by, or vulnerable to, environmental pollution and contaminants. The mapping tool contains 12 indicators related to pollution burden and eight indicators that track population characteristics and other vulnerabilities.

## ES.2.4 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. The process of identifying the Opportunity Sites involved eliminating sites with significant constraints to development. The total number of DUs that could result from implementation of the Zoning Code and Specific Plan amendments includes the 18,458 DUs that would be required to meet the RHNA and an additional approximately 5,500 DUs to account for less than 100 percent development of at least some of the Opportunity Sites. As the Project includes Zoning Code and Specific Plan amendments that affect a larger area than the Opportunity Sites, overall, the identified Opportunity Sites, with Zoning Code and Specific Plan amendments, could accommodate up to 31,564 DUs. Opportunity Sites are illustrated on Figure ES-2.

The Innovation District connects cutting-edge businesses with infrastructure and close-at-hand resources, builds off the character of historic and culturally rich neighborhoods, connects blue-collar workers to high-paying jobs, and contributes to the growth of affordable, eco-friendly public transportation. Residents will benefit from the diversification of housing options in their area, and the aim is to maintain affordable housing while creating opportunity for all residents to participate meaningfully in the economy. Specific development sites within the Innovation District are not identified, in order to give the City maximum flexibility in development in this area. Therefore, the development planned for the Innovation District is more generally described as providing up to 6,980 residential units and 7,762,000 square feet of nonresidential uses.

The Opportunity Sites inventory analysis was initially conducted using a data-driven process to identify 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.

### Zoning Code Amendments

Proposed rezoning of the Opportunity Sites would allow for fulfillment of the City's RHNA. The proposed Zoning Code and Specific Plan amendments include various multi-family and mixed-use land use categories, which would provide for development of some lower-story commercial/retail, office, and potentially live/work uses. Existing zoning is illustrated on Figure ES-3.

Areas proposed for rezoning are illustrated on Figure ES-4 and summarized in Table ES-1. For purposes of the CEQA analysis, the maximum development that could be allowed is analyzed in this EIR. The Project involves 239 acres that do not require zoning changes and 581 acres that would require general plan amendments, Zoning Code changes, and Specific Plan amendments, for a total of 870 parcels comprising 820 acres. Of the 581 acres, 460 acres would require Zone Code changes.

Figure ES-2  
Opportunity Sites

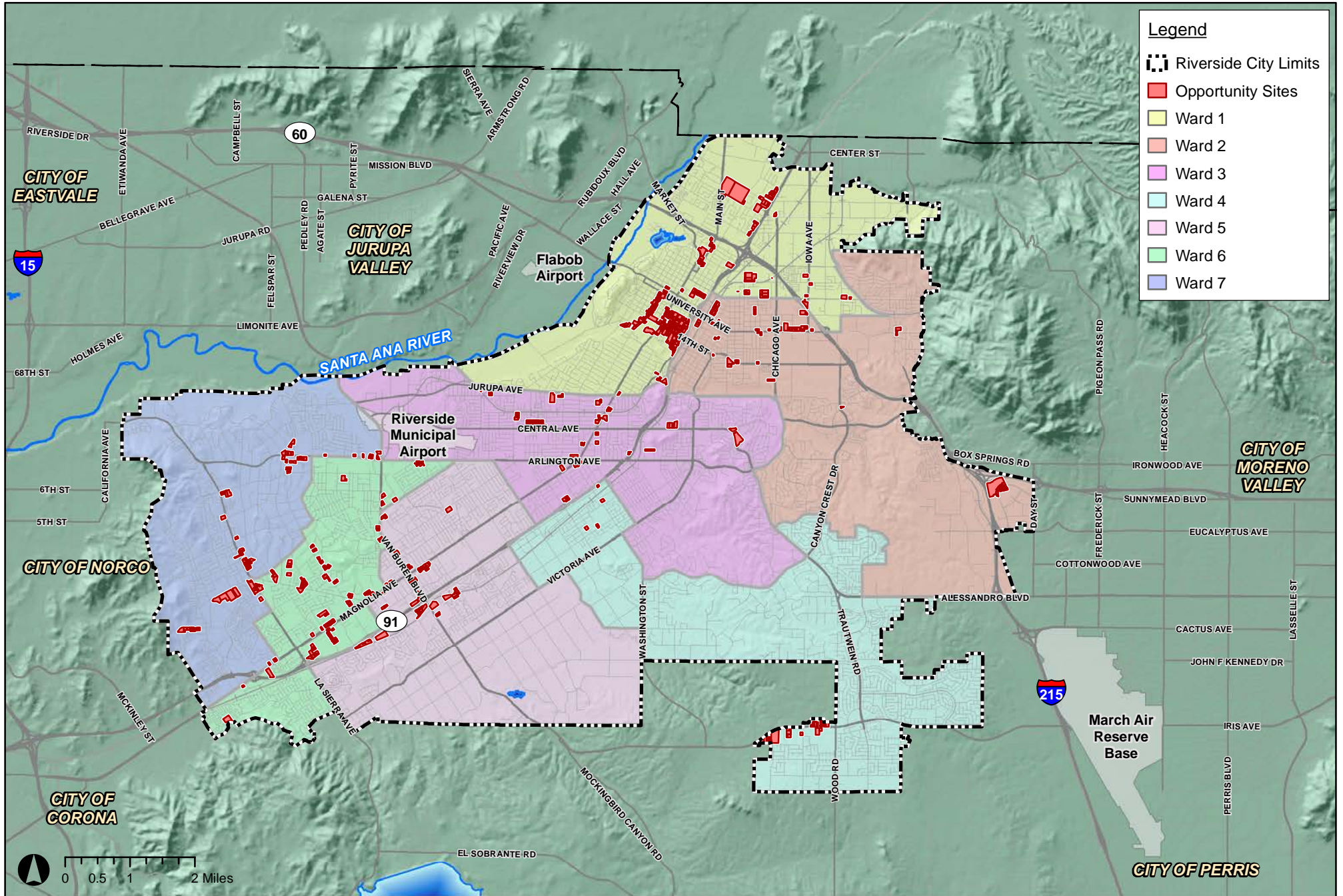




Figure ES-3  
Existing Zoning

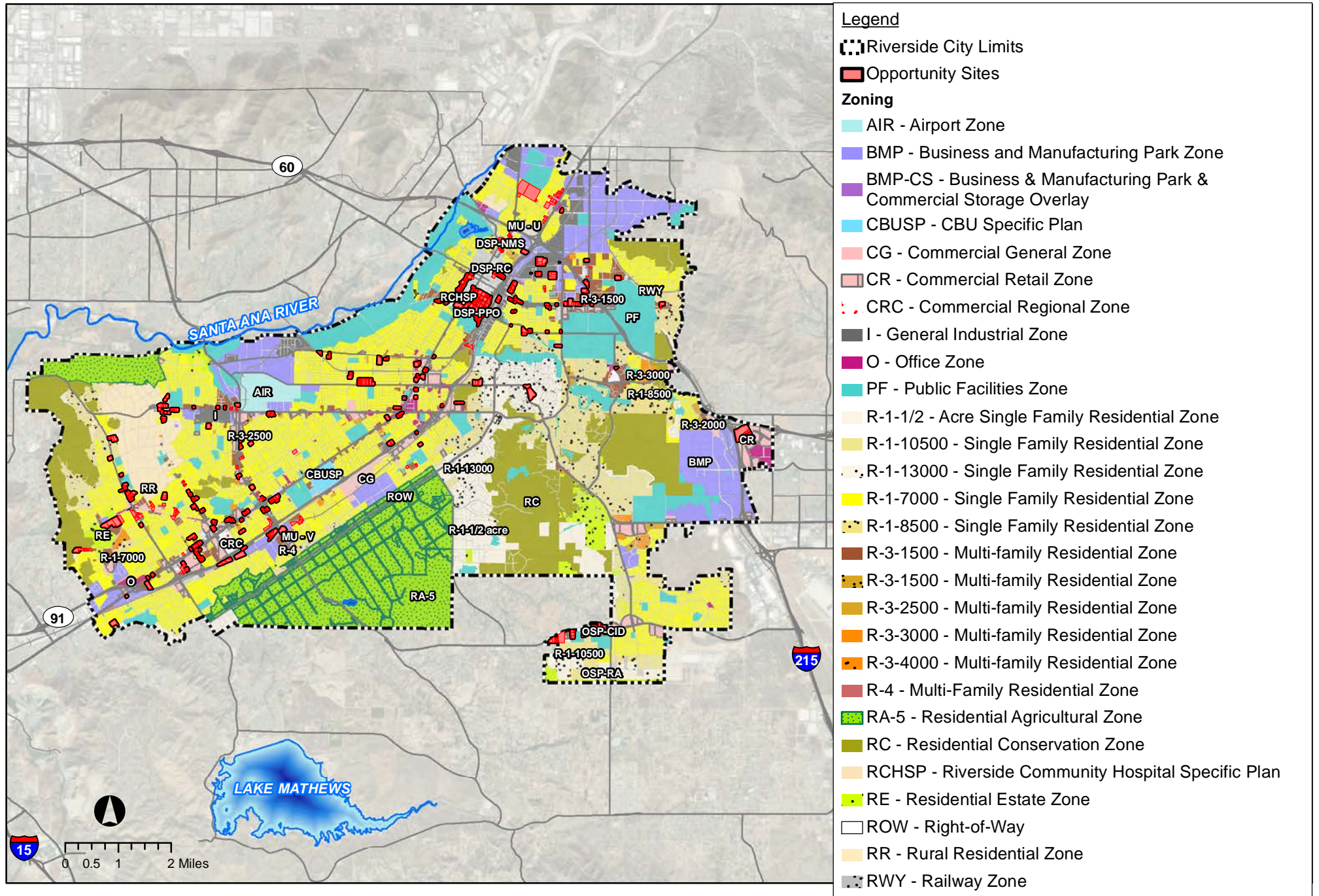
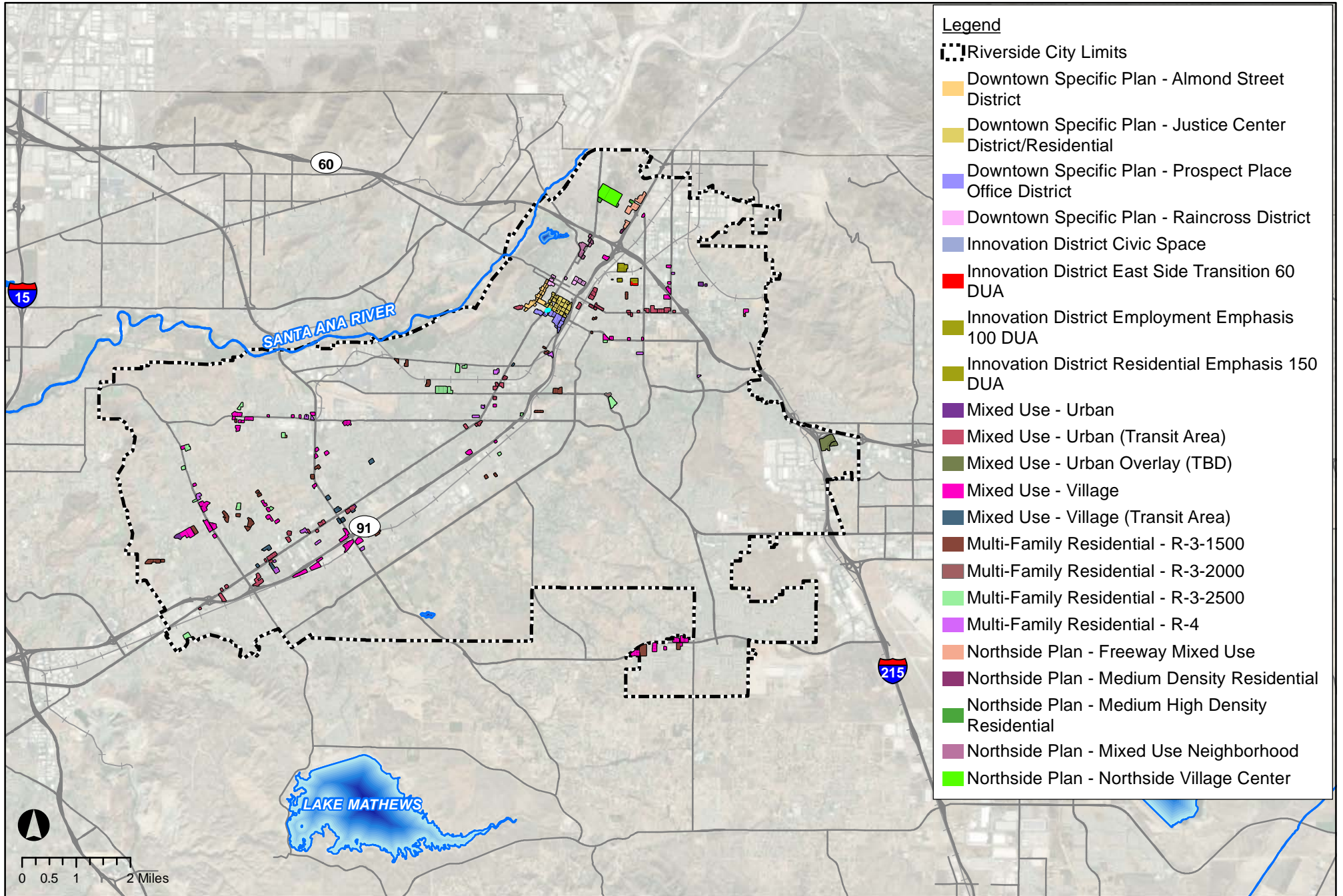






Figure ES-4  
Proposed Zoning





**Table ES-1. Number of Acres to be Rezoned by Ward**

Ward	Acres to be Rezoned
1	46
2	85
3	86
4	29
5	55
6	76
7	82
<b>TOTAL</b>	<b>460</b>

Source: City of Riverside 2021.

Not all Opportunity Sites identified in the preliminary inventory are currently zoned to allow for housing development. The next step in the process included developing scenarios to meet the City's RHNA obligation and refining the preliminary Opportunity Sites to develop a preferred alternative, or the 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 distributed equitably throughout the City.

The Opportunity Sites' existing onsite conditions indicate that approximately 759 acres (approximately 80 percent) of the Opportunity Sites are developed to varying degrees with residential and nonresidential land uses, while the remaining approximately 152 acres are undeveloped. Approximately 166 DUs and approximately 13 million square feet of nonresidential land uses exist on the Opportunity Sites.

## ES.2.5 Specific Plan Amendments

In addition to the Zoning Code amendments, the Housing Element update would require amendments to seven of the City's adopted Specific Plans. Please see Section 2.2.5 of Chapter 2, *Project Description*, for the Specific Plans that would require updates, including mapping and land use changes, to accommodate Opportunity Sites that have been identified within their boundaries.

## ES.3 Project Objectives

Objectives of the Project are:

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

- Add a variety of housing opportunities that will make Riverside a more accessible and resilient community.
- Locate new housing in areas readily accessible to services, parks and other amenities, transit, jobs, and activity centers.
- Identify vacant or under-developed sites, meaning sites with substantial unused land or development potential.
- Limit or prevent housing development in areas with development constraints, such as agricultural and conservation lands, airport influence areas, and, to the extent feasible, fire and flood hazard zones.
- Address the public safety and public health needs and concerns of 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 incompatible land uses, along major corridors, or near similar uses.

## ES.4 California Environmental Quality Act Summary and Project Impacts

The preparation of an EIR is guided by the CEQA statutes and guidelines. CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of proposed activities and the ways to avoid or reduce those effects by requiring implementation of feasible alternatives or mitigation measures. CEQA applies to all California government agencies at all levels, including local government agencies that must issue permits or provide discretionary approvals for projects proposed by private applicants. As such, the City is required to undertake the CEQA process before making a decision about the Project.

The Draft EIR must disclose environmental effects, including those that cannot be avoided; growth-inducing effects; effects found not to be significant; and significant cumulative impacts of all past, present, and reasonably anticipated future projects. The EIR neither approves nor denies a project. A public agency may approve a project, even if it would result in significant and unavoidable environmental impacts.

In April 2021, the City prepared a notice of preparation (NOP), and distributed it to responsible and affected agencies and other interested parties for a 30-day public review. The public review period for the NOP began on April 5, 2021, and ended on May 5, 2021. The NOP was also sent to the State Clearinghouse at the Governor's Office of Planning and Research (assigned State Clearinghouse No. 2021040089) to solicit statewide agency participation in determining the scope of the EIR. A public scoping meeting was held virtually at 6:00 p.m. on April 22, 2021. The contents of this Draft EIR were established based on the findings in the NOP and public and agency input. In accordance with CEQA, issues found to have no or less-than-significant impacts do not require further evaluation and are not addressed in this EIR. These issue areas include aesthetics, agriculture and forestry resources, energy, geology and soils, hydrology and water quality, mineral resources, and wildfire. All other environmental topics were evaluated in this Draft EIR and a summary of the impacts is provided below.

## ES.4.1 Summary of Project Impacts and Mitigation

Table ES-2 describes the environmental impacts that could result from implementation of the Project. Additionally, the table describes the level of significance before mitigation, mitigation measures as applicable, and level of significance after mitigation. The complete impact analysis is presented in Chapter 3, *Impact Analysis*. The level of significance for each impact was determined using significance criteria (thresholds) developed for each category of impacts; these criteria are presented in the appropriate sections of Chapter 3. Significant impacts are those adverse environmental impacts that meet or exceed the significance thresholds; less-than-significant impacts would not exceed the thresholds.

**Table ES-2. Summary of Project Impacts**

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<b>Air Quality</b>				
Impact AQ-1: The Project would not conflict with or obstruct implementation of the applicable air quality plan.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Significant and unavoidable	<p><b>MM-AQ-1: Implement measures to reduce construction-related criteria air pollutant emissions.</b></p> <p>Prior to approval by the City for non-ministerial projects proposed on Opportunity Sites, applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the Planning Division for review and approval. The evaluation shall be prepared in conformance with SCAQMD methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures and/or project design features to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans or construction drawings) submitted to the City and shall be verified by the City’s Building and Safety Division. While specific mitigation measures and/or project design features to reduce construction-related emissions would be determined during project-level analysis, potential mitigation could include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Requiring fugitive-dust control measures that exceed SCAQMD’s Rule 403, such as:                             <ul style="list-style-type: none"> <li>○ Use of nontoxic soil stabilizers to reduce wind erosion</li> <li>○ Applying water every 3 hours to active soil-disturbing activities</li> <li>○ Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials</li> </ul> </li> <li>• Using construction equipment rated by EPA as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or</li> </ul>	Significant and unavoidable

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>newer) emission limits, applicable for engines between 50 and 750 horsepower</p> <ul style="list-style-type: none"> <li>• Ensuring that construction equipment is properly serviced and maintained to the manufacturer’s standards</li> <li>• Limiting nonessential idling of construction equipment to no more than 5 consecutive minutes</li> <li>• Limiting onsite vehicle travel speeds on unpaved roads to 15 miles per hour</li> <li>• Installing wheel washers for all exiting trucks or washing all trucks and equipment leaving the project area</li> <li>• Using Super-Compliant VOC paints for coating of architectural surfaces whenever possible<sup>3</sup></li> </ul> <p><b>MM-AQ-2: Implement measures to reduce criteria air pollutant emissions during operation.</b></p> <p>Prior to approval by the City for non-ministerial development projects proposed on Opportunity Sites, applicants shall prepare and submit a technical assessment evaluating potential project operation phase-related air quality impacts to the Planning Division for review and approval. The evaluation shall be prepared in conformance with SCAQMD methodology in assessing air quality impacts. If operations-related air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the Planning Division shall require incorporation of mitigation measures and/or project design features to reduce air pollutant emissions during operational activities, to be included as conditions of approval. Possible mitigation measures and/or project design features to reduce long-term emissions could include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Providing truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with</li> </ul>	

<sup>3</sup> A list of Super-Compliant architectural coating manufactures can be found on SCAQMD’s website at <http://www.aqmd.gov/docs/default-source/planning/architectural-coatings/super-compliant-manf-list.pdf?sfvrsn=77>.

Potential Environmental Impacts	<i>Public Safety Element Update and Environmental Justice Policies</i>	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Impact AQ-2: The Project could result in a cumulatively considerable net increase in any criteria pollutant for which the	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Significant and unavoidable	<p>CARB Rule 2845 (13 California Code of Regulations Chapter 10 § 2485)</p> <ul style="list-style-type: none"> <li>• Providing changing/shower facilities as specified in Section A5.106.4.3 of the California Green Building Standards Code (CALGreen) (Nonresidential Voluntary Measures)</li> <li>• Providing bicycle parking facilities per Section A4.106.9 (Residential Voluntary Measures) of CALGreen</li> <li>• Providing preferential parking spaces for low-emitting, fuel-efficient, and carpool/van vehicles per Section A5.106.5.1 of CALGreen (Nonresidential Voluntary Measures)</li> <li>• Encouraging facilities to support electric charging stations per Section A5.106.5.3 (Nonresidential Voluntary Measures) and Section A5.106.8.2 (Residential Voluntary Measures) of CALGreen</li> <li>• Providing Energy Star–certified appliances or appliances of equivalent energy efficiency (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star–certified or equivalent appliances shall be verified by Building &amp; Safety during plan check</li> <li>• Equipping landscaped common areas with electrical outlets to enable use of electric landscaping equipment to the extent feasible</li> </ul> <p>None required.</p> <p><b>MM-AQ-1: Implement measures to reduce construction-related criteria air pollutant emissions.</b></p> <p><b>MM-AQ-2: Implement measures to reduce criteria air pollutant emissions during operation.</b></p>	N/A
		Less than significant		Significant and unavoidable



Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
project region is classified as nonattainment under an applicable federal or state air quality standard.	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact AQ-3: The Project could expose sensitive receptors to substantial pollutant concentrations.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Significant and unavoidable	<p><b>MM-AQ-1: Implement measures to reduce construction-related criteria air pollutant emissions.</b></p> <p><b>MM-AQ-2: Implement measures to reduce criteria air pollutant emissions during operation.</b></p> <p><b>MM-AQ-3: Prepare a health risk assessment.</b></p> <p>Prior to approval by the City, applicants for Opportunity Site development that (1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and (2) are within 1,000 feet of a sensitive land use (e.g., residences, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit an HRA to the Planning Division for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and SCAQMD. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective thresholds, as established by SCAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that best available control technologies for toxics, including appropriate enforcement mechanisms, that are capable of reducing potential cancer and noncancer risks are implemented. Best available control technologies for toxics may include, but are not limited to, restricting idling on site or electrifying warehousing docks to reduce DPM or requiring use of newer equipment and/or vehicles. Best available control technologies for toxics identified in the HRA shall be identified as mitigation measures in the</p>	Significant and unavoidable

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p><i>Public Safety Element Update and Environmental Justice Policies</i></p>	<p>Less than significant</p>	<p>environmental document and/or incorporated into the project plans. None required.</p>	<p>N/A</p>
<p><b>Biological Resources</b></p>			
<p>Impact BIO-1: The Project 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.</p>	<p>Potentially significant</p>	<p><b>MM-BIO-1: Conduct literature review, habitat assessment, and surveys.</b> <i>Preliminary Review:</i> Prior to construction on Opportunity Sites that are vacant or where the potential presence of biological or aquatic resources exists, a consistency review shall be performed to ensure that the project is consistent with the requirements of the WRC MSHCP. For the project-specific WRC MSHCP consistency process, the applicant shall employ a qualified biologist approved by the City to review the future Opportunity Site project. The qualified biologist shall conduct a preliminary site-specific literature review, which shall consider, at a minimum, the future development project, site location, GIS information, WRC MSHCP survey areas and requirements, and known sensitive biological resources. The review shall assess the site for special-status plants and/or wildlife, aquatic resources, sensitive natural communities, wildlife corridors or nurseries, or other regulated biological resources covered by the WRC MSHCP and/or pursuant to CEQA, FESA, or CESA that could be affected by the project. In some cases, a literature review would be sufficient for the biologist to make a no impact and/or a less-than-significant impact determination for all six of the thresholds of significance (Section 3.2.4) of biological resources and/or the determination that the project is consistent with the WRC MSHCP. In this case, no further work shall be required, and, if deemed necessary by the City, a summary report stating the basis for these findings, identifying each threshold of significance with a CEQA finding, shall be the only requirement.</p>	<p>Less than significant</p>

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p><i>Habitat Assessment Survey:</i> If, during the preliminary review, it is determined that potential biological resources exist on the individual Opportunity Site that could be affected, then a habitat assessment survey shall be required unless a qualified biologist determines that a field review/habitat assessment is not needed. If needed, and/or the project is in a WRC MSHCP designated survey area, this survey shall consist of a site visit conducted by a qualified biologist, where the proposed individual development project and adjacent buffer (as appropriate for the target species relative to the potential project direct and indirect impacts) shall be assessed for WRC MSHCP covered species and habitats; candidate, sensitive, or special-status plants and/or wildlife; aquatic resources; sensitive natural communities; and wildlife corridors or nurseries while identifying and mapping all vegetation communities and land-cover types. If suitable habitat is present for candidate, sensitive, or special-status plants or animals and cannot be avoided, then focused protocol surveys may be required, as determined by the qualified biologist, with appropriate reporting. If aquatic resources are present and cannot be avoided, a jurisdictional delineation may be required. Mitigation shall include an analysis of all the biological resources identified in the thresholds of significance, with a determination made regarding significance for each threshold. Reporting shall include regulatory assessment, impact analyses, and identification and implementation of appropriate measures based on the presence of biological resources.</p> <p><i>Reduce and Avoid Impacts:</i> If, following the literature review and surveys for Opportunity Sites, it is determined that the site would not directly or indirectly affect any WRC MSHCP covered species or habitats; candidate, sensitive, or special-status plants and/or wildlife; aquatic resources; sensitive natural communities; or wildlife corridors or nurseries, then no further action or WRC MSHCP consistency analysis shall be required. If, however, it is determined that impacts on WRC MSHCP covered species or habitats; candidate, sensitive, or special-status plants and/or wildlife; aquatic resources; sensitive natural communities; or</p>	

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
			wildlife corridors or nurseries would occur and therefore would be considered significant, then additional mitigation measures as recommended by the qualified biologist and approved by the Planning Division shall be implemented to avoid or reduce impacts to the maximum extent feasible.	
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact BIO-2: The Project could 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.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<b>MM-BIO-1: Conduct literature review, habitat assessment, and surveys.</b>	Less than significant
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact BIO-3: The Project could have a substantial adverse effect on state- or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands) through direct removal, filling, hydrological	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<b>MM-BIO-1: Conduct literature review, habitat assessment, and surveys.</b>	Less than significant
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
interruption, or other means.				
Impact BIO-4: The Project could 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.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<b>MM-BIO-1: Conduct literature review, habitat assessment, and surveys.</b>	Less than significant
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact BIO-5: The Project could conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<b>MM-BIO-1: Conduct literature review, habitat assessment, and surveys.</b>	Less than significant
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
<b>Cultural Resources</b>				
Impact CUL-1: The Project could cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<b>MM-CUL-1: Conduct a historical resource assessment.</b> The individual applicants shall hire a Secretary of the Interior-qualified historic preservation professional to conduct a historical resource assessment if a structure to be affected by a subsequent development project, at the time of application, is not in a previously surveyed area, is not a historical resource for the purposes of CEQA, and is at least 50 years old. The assessment shall formally evaluate the potential resource’s eligibility for listing to the CRHR, its potential eligibility as a Landmark or Structure of	Less than significant

Potential Environmental Impacts	<i>Public Safety Element Update and Environmental Justice Policies</i>	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Impact CUL-2: The Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<p><b>MM-CUL-2: Conduct an archaeological study.</b></p> <p>For Opportunity Site development projects that require CEQA analysis (non-ministerial projects), prior to construction, and if it is determined that the development project will involve ground disturbance of some type, the applicant shall conduct an archaeological study. This study will be conducted during project-specific CEQA analyses at Opportunity Sites that have not been studied in such a manner in the previous 5 years. The archaeological study shall follow the guidelines set forth by the City of Riverside Community &amp; Economic Development Department in the document titled <i>Consultant Requirements for Cultural Resources Survey, Studies and Reports Information Sheet</i> (City of Riverside Community &amp; Economic Development Department 2011) or successor document.</p> <p>The cultural resources archaeological recommendations shall be valid for 5 years after the date of the record search. After 5 years, the applicant shall retain an archaeologist who shall acquire an updated record search from the Eastern Information Center and review the cultural resources technical report recommendations.</p>	Less than significant
		Less than significant	<p>Merit, and its potential eligibility as a Contributor to a Historic District or Neighborhood Conservation Area. If the resource is found eligible for any of those designations, it shall be considered a resource that qualifies as a historical resource under CEQA and is therefore subject to the provisions of the Cultural Resources Ordinance. This includes obtaining the pertinent Certificates of Appropriateness and ensuring that the project plans adhere to the SOI Standards. For resources found ineligible for any of those designations, no additional mitigation would be necessary.</p> <p>None required.</p>	N/A

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>For proposed development locations where only a record search and/or a site visit have already been conducted prior to this EIR, the project applicant shall retain an archaeologist to:</p> <ul style="list-style-type: none"> <li>• Review record search results, site visit results, and any recommendations.</li> <li>• Obtain an updated record search from the Eastern Information Center if the record search is older than 5 years.</li> <li>• Review available historic maps, historic aerials, and other archival materials.</li> <li>• Prepare a cultural resources memo with existing or updated record search results; a summary of background research of historic maps, aerials, etc.; and potential for historic and prehistoric archaeological resources to be present at the proposed development location. Additionally, the memo shall identify potential impacts and provide recommendations.</li> </ul> <p>The City shall review these findings and make a determination regarding the significance of project-level impacts prior to approval of any future development. Should the archaeological study result in the identification of archaeological resources on the proposed development site, or should unanticipated discoveries of previously unknown archaeological resources be made during ground-disturbing activities at an Opportunity Site, Mitigation Measures <b>MM-CUL-3</b> through <b>MM-CUL-6</b> would be applicable.</p> <p><b>MM-CUL-3: Avoid archaeological sites through establishment of Environmentally Sensitive Areas (ESAs).</b></p> <p>If archaeological resources are identified either through an archaeological study or as unanticipated discoveries during construction, implementation of Mitigation Measure <b>MM-CUL-3</b> would be required. Avoidance is always the preferred method of treatment for archaeological sites. Additionally, should sacred objects or objects of religious importance to Native American tribes be identified, preservation in place avoids conflicts with traditional values of tribes who ascribe meaning to these resources and their locations. Impacts on cultural resources can be avoided through</p>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>establishing fencing around cultural resources with a buffer and delineating these locations as ESAs. The appropriate buffer size shall be delineated upon consultation with Native American tribes and the City (for prehistoric resources). The City and the consultant archaeologist for individual development projects shall determine appropriate buffers for historical-period (non-Native American) archaeological resources on a case-by-case basis based on the known extent of archaeological sites and the relationship to proposed ground disturbance.</p> <p><b>MM-CUL-4: Develop and implement an Archaeological Treatment Plan (ATP) for evaluation of newly discovered and/or unevaluated archaeological resources.</b></p> <p>Mitigation Measure <b>MM-CUL-4</b> shall apply as follows:</p> <ul style="list-style-type: none"> <li>• The results of an archaeological study conducted under Mitigation Measure <b>MM-CUL-2</b> are unable to determine the eligibility of newly identified archaeological sites for inclusion to the CRHR and it is determined by the consulting archaeologist that additional study through Phase II testing is required;</li> <li>• It is not possible to avoid impacts through the establishment of ESAs; or</li> <li>• Unanticipated archaeological resources are discovered during construction on Opportunity Sites.</li> </ul> <p>If it is necessary to properly evaluate such properties in such a manner, an ATP shall be developed that describes methods and procedures for conducting subsurface excavations to determine the vertical and horizontal extents of an archaeological site. The ATP shall define the parameters of archaeological testing at the site and the extent of excavation and analysis of any materials recovered. The ATP shall also include guidelines for treatment and curation of any materials recovered during the testing process. Subsequent to implementation of the ATP, a technical report describing the methods and results of archaeological testing and formal evaluations of the archaeological sites and recommendations for further treatment shall be completed. The ATP shall be approved</p>	



Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>by the City and should involve consultation and review by Native American tribes consulting on the proposed development project. An ATP shall only be necessary for newly discovered archaeological sites that require additional information to make determinations of eligibility.</p> <p><b>MM-CUL-5: Implement data recovery for CRHR-eligible sites that cannot be avoided.</b></p> <p>If archaeological studies identify a cultural resource as being potentially eligible for listing in the CRHR and ESAs cannot be established or project design cannot be altered, resulting in impacts on the site, then a Phase III data recovery program shall be developed, when mutually agreed upon by Native American representatives (for prehistoric or historic-period Native American sites) and the City. The data recovery program shall be outlined in a Data Recovery Treatment Plan that details the procedures and objectives for mitigation of impacts on the archaeological site. The Data Recovery Treatment Plan shall include a research design with testable hypotheses and data requirements necessary to address these hypotheses. Additionally, the Data Recovery Treatment Plan shall identify methods of excavation, analysis, and curation of any archaeological materials recovered. The Data Recovery Treatment Plan shall also identify the treatment of any human remains discovered during data recovery procedures. If the archaeological resource is Native American (prehistoric or historic-period in age), then the City, the applicant, and the archaeologist shall engage in consultation so that Native American representatives can be involved in the development of the data recovery plan.</p> <p>Data recovery shall involve analysis of a representative sample of the materials recovered during excavation. For prehistoric archaeological sites, all excavations should be monitored by a representative from a geographically appropriate Native American group. At the conclusion of the data recovery program, a data recovery technical report shall be completed detailing the results of the excavations and analysis. Curation of recovered archaeological materials shall be conducted per the guidance in the Data Recovery</p>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>Treatment Plan and with consultation between the City and appropriate Native American tribes. Other forms of mitigation could include additional research with archival sources, landscape studies, designation of open space, public outreach programs, and public education/public displays.</p> <p><b>MM-CUL-6: Retain an on-call archaeologist for monitoring.</b>                      For Opportunity Site development projects that require CEQA analysis, Mitigation Measure <b>MM-CUL-6</b> shall be implemented when archaeological studies completed under Mitigation Measure <b>MM-CUL-2</b> determine that a project has a less-than-significant potential for archaeological discoveries. Additionally, upon agreement between Native American representatives (for prehistoric or historic-period Native American sites) and the City for archaeological resources that have not been determined eligible for listing in the CRHR or NRHP that are unavoidable at an Opportunity Site, Mitigation Measure <b>MM-CUL-6</b> shall be implemented. Prior to the issuance of a grading permit, the applicant shall provide a letter from a qualified archaeologist stating that the applicant has retained their services, and that the archaeologist shall be on call during all grading and other significant ground-disturbing activities in native sediments.</p> <p><b>MM-CUL-7: Conduct archaeological and Native American monitoring.</b>                      If cultural resource studies have identified archaeological resources determined eligible for the CRHR or NRHP that are unavoidable at an Opportunity Site, Mitigation Measure <b>MM-CUL-7</b> shall be implemented upon agreement among Native American representatives (for prehistoric or historic-period Native American sites). At least 30 days prior to application for a grading permit and before any grading, excavation, and/or ground-disturbing activities take place, the applicant shall retain an SOI Standards-qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.</p>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>The archaeologist, in consultation with consulting tribes, the applicant, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that occur on a development site. Details in the plan shall include:</p> <ol style="list-style-type: none"> <li>1. Project grading and development scheduling:                             <ol style="list-style-type: none"> <li>a. The development of a rotating or simultaneous schedule in coordination with the applicant and the project archaeologist for designated Native American tribal monitors (if resources are prehistoric in age) from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American tribal monitors’ authority to stop and redirect grading activities in coordination with all project archaeologists</li> <li>b. The protocols and stipulations that the applicant, tribes, and project archaeologist for the individual development project shall follow in the event of inadvertent cultural resource discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation</li> <li>c. Treatment and final disposition of any cultural resources, sacred sites, and human remains if discovered on a development site</li> </ol> </li> </ol> <p>The scheduling and timing of the Cultural Sensitivity Training</p> <p><b>MM-CUL-8: Employ procedures for treatment and disposition of cultural resources.</b></p> <p>If cultural resources are inadvertently discovered during the course of grading for individual Opportunity Sites, the following procedures shall be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>1. <b>Consulting Tribe(s) Notified:</b> Within 24 hours of discovery, and if the resources are Native American in origin, the</li> </ol>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>consulting tribe(s) shall be notified via email and phone. The applicant shall provide the City evidence of notification to consulting tribes. Consulting tribe(s) shall be allowed access to the discovery in order to assist with the significance evaluation.</p> <ol style="list-style-type: none"> <li>2. <b>Temporary Curation and Storage:</b> During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from a development site shall be thoroughly inventoried with tribal monitor oversight of the process.</li> <li>3. <b>Treatment and Final Disposition:</b> The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains, as part of the required mitigation for impacts on cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community &amp; Economic Development Department with evidence of same:               <ol style="list-style-type: none"> <li>a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed.</li> <li>b. Execute a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will ensure professional curation and availability to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation.</li> </ol> </li> </ol>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>c. If more than one Native American tribe or band is involved with the subsequent development project and cannot come to a consensus as to the disposition of cultural materials, curate the discovered items at the Western Science Center or Museum of Riverside by default.</p> <p>At the completion of grading, excavation, and ground-disturbing activities on the site, provide to the City a Phase IV Monitoring Report documenting monitoring activities conducted by the project archaeologist and Native American tribal monitors within 60 days of completion of grading. This report shall document the impacts on the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required Cultural Sensitivity Training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced shall be submitted to the City, the Eastern Information Center, and consulting tribes.</p>	
		<p><b>MM-CUL-9: Conduct cultural sensitivity training.</b></p> <p>For Opportunity Site development projects where either Mitigation Measures <b>MM-CUL-6</b> or <b>MM-CUL-7</b> are implemented, Mitigation Measure <b>MM-CUL-9</b> shall also be implemented. Prior to the commencement of construction activities, the SOI Standards-certified archaeologist and Native American monitors shall attend the pre-grading meeting with the applicant/permit holder’s contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in</p>	

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<i>Public Safety Element Update and Environmental Justice Policies</i>		Less than significant	None required.  sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.	N/A
Paleontological Resources				
Impact PAL-1: The Project could directly or indirectly destroy a unique paleontological resource or site.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<p><b>MM-PAL-1: Conduct paleontological resources investigations.</b></p> <p>During the development review process and prior to construction on Opportunity Sites that are located on geologic units with Undetermined, High A, or High B paleontological sensitivity, the project applicant shall conduct paleontological resource investigations consistent with SVP guidelines. This process shall include:</p> <ul style="list-style-type: none"> <li>• Conducting a paleontological records search through the Los Angeles County Natural History Museum to identify previously recorded paleontological localities and the presence of sensitive deposits in the City</li> <li>• Reviewing Opportunity Site design and maximum depths and extents of Project ground disturbance components</li> <li>• Reviewing publicly available geotechnical reports for information concerning subsurface deposits and deposit depths across the City</li> <li>• Identifying the potential for sensitive paleontological deposits underlying the Opportunity Site that project implementation could affect</li> <li>• Determining whether impacts on sensitive deposits, if present, would be significant.</li> </ul> <p>If no sensitive deposits are identified or if they are sufficiently deeper than the Opportunity Site excavations and would not be encountered during construction, no further steps shall be required. If sensitive deposits are identified and could be affected</p>	Less than significant

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>by development of the Opportunity Sites, implement Mitigation Measure <b>MM-PAL-2</b>.</p> <p><b>MM-PAL-2: Avoid paleontological resources or conduct monitoring.</b></p> <p>The applicant shall redesign the Opportunity Site development to avoid sensitive paleontological resources and deposits that could potentially contain these resources. If avoidance and/or Opportunity Site redesign is infeasible, then paleontological monitoring shall be implemented and shall include the following implementation steps:</p> <ul style="list-style-type: none"> <li>• The applicant shall retain a qualified paleontologist, who shall attend the preconstruction meeting(s) to consult with the grading and excavation contractors or subcontractors concerning excavation schedules, paleontological field techniques, and safety issues. A qualified paleontologist is defined as an individual who (1) has an MS or PhD in paleontology or geology and/or a publication record in peer-reviewed journals; (2) also has demonstrated familiarity with paleontological procedures and techniques; (3) is knowledgeable in the geology and paleontology of the county; (4) has proficiency in recognizing fossils in the field, determining their significance, and collecting vertebrate fossils in the field; and (5) has worked as a paleontological mitigation project supervisor in the county for at least 1 year.</li> <li>• A paleontological monitor or a qualified paleontologist shall be on site on a full-time basis during excavation and ground-disturbing activities that occur in any undisturbed deposits below ground surface, to inspect exposures for contained fossils. The paleontological monitor shall work under the direction of the qualified paleontologist. A paleontological monitor is defined as an individual selected by the qualified paleontologist who has experience in the collection and salvage of fossil materials. If fossils that have significance for the scientific record are discovered on a development site, the qualified paleontologist</li> </ul>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>shall recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains.</p> <ul style="list-style-type: none"> <li>• The qualified paleontologist shall be responsible for the cleaning, repairing, sorting, and cataloguing of fossil remains collected during the monitoring and salvage portion of the mitigation program.</li> <li>• Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) at a scientific institution with permanent paleontological collections, such as the Los Angeles County Natural History Museum.</li> <li>• Within 30 days after the completion of excavation and ground-disturbing activities, the qualified paleontologist shall prepare and submit to the City of Riverside Community &amp; Economic Development Department, Planning Division a paleontological resource recovery report that documents the results of the mitigation program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.</li> </ul> <p><b>MM-PAL-3: Avoid/minimize impacts on paleontological resources during operations.</b></p> <p>If significant paleontological resources and sensitive deposits with the potential to contain significant paleontological resources are identified within an Opportunity Site area during design/planning (Mitigation Measures <b>MM-PAL-1</b> and <b>MM-PAL-2</b>), and deposits that are sensitive for significant paleontological resources remain exposed at or near the ground surface or become exposed during project operations, then an avoidance and minimization plan shall be prepared to avoid/minimize potential impacts during operations. This plan may include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Securing sensitive deposits from accessibility through the development of exclusion zones</li> <li>• Preparing an operations and maintenance plan to minimize degradation and exposure of sensitive deposits</li> </ul>	



Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p><i>Public Safety Element Update and Environmental Justice Policies</i></p>	<p>Potentially significant</p>	<ul style="list-style-type: none"> <li>Designing and developing interpretive exhibits to provide education and understanding of the importance of avoiding and protecting sensitive deposits and paleontological resources</li> </ul> <p>If significant impacts on a newly exposed or existing significant paleontological resource cannot be avoided, then Mitigation Measure <b>MM-PAL-2</b> shall be implemented.</p> <p><b>MM-PAL-1: Conduct paleontological resources investigations.</b>  <b>MM-PAL-2: Avoid paleontological resources or conduct monitoring.</b>  <b>MM-PAL-3: Avoid/minimize impacts on paleontological resources during operations.</b></p>	<p>Less than significant</p>
<b>Greenhouse Gas Emissions</b>			
<p>Impact GHG-1: The Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</p>	<p><i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i></p>	<p>Potentially significant</p> <p><b>MM-GHG-1: Implement diesel emission-reduction measures during construction.</b></p> <p>The applicant and/or contractor associated with future development of Opportunity Sites shall implement the following measures during construction and, where specified below, shall submit reports demonstrating compliance to the Planning Division for its review and approval.</p> <ul style="list-style-type: none"> <li>The applicant shall limit all equipment and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. The applicant shall also install clear signage regarding the limitation on idling time at the delivery driveway and loading areas.</li> <li>The applicant shall verify that all construction equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction activities using diesel-powered vehicles or equipment, the applicant shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into the delivery driveway and loading areas. The applicant shall submit a report by the certified mechanic of the</li> </ul>	<p>Significant and Unavoidable</p>

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
			<p>condition construction-related vehicles and equipment to the Planning Division prior to commencement of their use.</p> <p><b>MM-GHG-2: Restrict use of natural gas in new development.</b> Future development on Opportunity Sites shall utilize electrical lighting and heating to the maximum extent feasible or to the extent required by existing or future regulations. Natural gas appliances are to be avoided to the extent feasible as determined by the availability and capacity of electrical power distribution infrastructure.</p> <p><b>MM-GHG-3: Implement measures to reduce GHG emissions during operation.</b> Prior to discretionary approval by the City for Opportunity Site projects subject to CEQA review (i.e., non-ministerial projects), each applicant shall be required to demonstrate that all feasible Tier 1 and Tier 2 CALGreen voluntary measures (Appendix A4 and Appendix A5 of the 2019 CALGreen) shall be implemented.</p>	
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact GHG-2: The Project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<p><b>MM-GHG-1: Implement diesel emission-reduction measures during construction.</b></p> <p><b>MM-GHG-2: Restrict use of natural gas in new development.</b></p> <p><b>MM-GHG-3: Implement measures to reduce GHG emissions during operation.</b></p>	Significant and unavoidable
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
<b>Hazards and Hazardous Materials</b>				
Impact HAZ-1: The Project could create a	<i>Housing Element Update, Zoning Code</i>	Potentially significant	<b>MM-HAZ-1: Conduct project-level hazardous material site assessment for construction of Opportunity Sites involving soil</b>	Less than significant

Potential Environmental Impacts	<i>and Specific Plan Amendments, and Environmental Justice Policies</i>	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p>	<p><i>and Specific Plan Amendments, and Environmental Justice Policies</i></p>		<p><b>disturbance at sites listed on hazardous materials databases and implement measures.</b></p> <p>For development of Opportunity Sites at or adjacent to hazardous materials sites that are listed on hazardous materials databases (see Section 3.6.2, <i>Environmental Setting</i>), prior to construction activities associated with any Opportunity Site involving ground disturbance, the specific applicant shall be required to retain a professional hazardous materials specialist specializing in hazardous material impact assessment. The professional hazardous materials specialist shall conduct a project-level analysis to verify the presence or absence of hazardous material conditions (including Cortese List sites) in the vicinity of the ground-disturbance area and if there is potential for existing hazardous material conditions to be disturbed or released as a result of construction activities.</p> <p>This assessment shall consist of a search for environment-related information present in publicly accessible databases. The information shall be reviewed to determine if the construction footprint or adjacent properties are the site of (or in the vicinity of) contaminated soil or groundwater that has been left in place. If the professional hazardous materials specialist determines that the site (where ground disturbance is to occur) or hazardous material conditions in the vicinity of the site do not pose a risk, additional steps in this measure would not be required.</p> <p>If the construction footprint or adjacent properties are the site of contaminated soil or groundwater, the professional hazardous materials specialist shall determine the potential risk to construction workers, the public, or the environment from construction activities. The determination of risk would consider, among other factors, regulatory status, the type of project, the type of contaminated property, distance and direction to the project, and appropriate measures. If the hazardous materials specialist concludes that the subsequent project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the</p>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>release of hazardous materials into the environment, then no further action would be required.</p> <p>If a site is considered a risk to construction workers, the public, or the environment, the applicant shall implement measures to reduce risk including one or more of the following:</p> <ul style="list-style-type: none"> <li>• Implementation of engineering controls and BMPs during construction to minimize human exposure to potentially contaminated soils during construction. Engineering controls and construction BMPs could include, but are not limited to, the following:                             <ul style="list-style-type: none"> <li>○ Contractor employees working on site handling potentially contaminated media shall be certified in the Occupational Health and Safety Administration’s 40-hour Hazardous Waste Operations and Emergency Response training.</li> <li>○ Contractors shall water or mist soil as it is being excavated and stockpiled or loaded onto transport trucks.</li> <li>○ Contractors shall place any stockpiled soil in areas shielded from prevailing winds or cover stockpiles with staked and/or anchored sheeting.</li> </ul> </li> <li>• Conducting a soil and/or groundwater sampling program to determine the type and extent of contaminants. The sampling program could include:                             <ul style="list-style-type: none"> <li>○ A scope of work for preparation of a Health and Safety Plan that specifies pre-field activity marking of boring locations and obtainment of utility clearance; and field activities, such as identifying appropriate sampling procedures, health and safety measures, chemical testing methods, and quality assurance/quality control procedures</li> <li>○ Necessary permits for well installation and/or boring advancement</li> <li>○ A Soil Sampling and Analysis Plan in accordance with the scope of work</li> <li>○ Laboratory analyses conducted by a state-certified laboratory</li> </ul> </li> </ul>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<ul style="list-style-type: none"> <li>○ Disposal processes, including transport by a state-certified hazardous material hauler to a state-certified disposal or recycling facility licensed to accept and treat hazardous waste</li> <li>● Implementation of a Soil Management Plan. The purpose of a Soil Management Plan is to provide administrative, procedural, and analytical guidance to expedite and clarify decisions and actions if contaminated soils are encountered. Typically, procedures and protocols are included to ensure that contaminated soil is excavated properly and efficiently, and that unacceptable risks are not posed to human health or the environment from contaminated soils. Additionally, the Soil Management Plan shall contain procedures for handling, stockpiling, screening, and disposing of the excavated soil. The Soil Management Plan is a site-specific technical plan that could be required depending on other screening activities conducted (listed above) and is not included as part of this EIR.</li> </ul> <p>If dewatering would be necessary in areas where contaminated groundwater exists, then dewatering procedures could be subject to permit requirements of the National Pollutant Discharge Elimination System. In addition, wastewater profiling shall be conducted to determine proper handling and disposal.</p>	
	<p><i>Public Safety Element Update and Environmental Justice Policies</i></p>	<p>None required.</p>	<p>N/A</p>
<p>Impact HAZ-2: The Project would not emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile</p>	<p><i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i></p>	<p><b>MM-HAZ-1: Conduct project-level hazardous material site assessment for construction of Opportunity Sites involving soil disturbance at sites listed on hazardous materials databases and implement measures.</b></p>	<p>Less than significant</p>
	<p><i>Public Safety Element Update and</i></p>	<p>None required.</p>	<p>N/A</p>

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
of an existing or proposed school.	<i>Environmental Justice Policies</i>			
Impact HAZ-3: The Project would be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<b>MM-HAZ-1: Conduct project-level hazardous material site assessment for construction of Opportunity Sites involving soil disturbance at sites listed on hazardous materials databases and implement measures.</b>	Less than significant
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
<b>Land Use and Planning</b>				
Impact LU-1: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Less than significant	None required.	N/A
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact LU-2: The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Less than significant	None required.	N/A
	<i>Public Safety Element Update and</i>	Less than significant	None required.	N/A

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
sustainable groundwater management of the basin.	<i>Environmental Justice Policies</i>			
<b>Noise</b>				
Impact NOI-1: The Project would generate temporary or permanent increases in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards for the City	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<p><b>MM-NOI-1: Prepare a focused noise study and implement findings to reduce traffic noise.</b></p> <p>For Opportunity Site projects that would exceed the 60 or 65 dBA CNEL threshold (based on the noise contour maps included in GP 2025), the applicant shall prepare a detailed analysis and implement mitigation to comply with the applicable City standards outlined in GP 2025. This could include but would not be limited to actions such as:</p> <ul style="list-style-type: none"> <li>• Installation of soundwalls to break the line of sight from noise sources such as traffic noise</li> <li>• Installation of noise-reducing insulation</li> <li>• Installation of windows with STC ratings appropriate to reduce exterior-to-interior noise transmission</li> <li>• Installation of HVAC systems</li> </ul> <p><b>MM-NOI-2: For any development where stationary noise sources may exceed interior or exterior noise standards, prepare a focused noise study and implement findings to reduce HVAC noise.</b></p> <p>The applicant shall design HVAC systems for Opportunity Sites to comply with the applicable City Municipal Code standards. This could include but would not be limited to actions such as:</p> <ul style="list-style-type: none"> <li>• Preparation of a focused noise study to analyze HVAC noise, which shall identify a location for HVAC systems at appropriate distances so as to not exceed a noise level of 55 dBA <math>L_{eq}</math> (exterior) and 45 dBA <math>L_{eq}</math> (interior) between the hours of 7:00 a.m. and 10:00 p.m. and 45 dBA <math>L_{eq}</math> (exterior) and 35 dBA <math>L_{eq}</math> (interior) between the hours of 10:00 p.m. and 7:00 a.m. at the closest noise-sensitive land use. Design features that could be used to</li> </ul>	Significant and unavoidable

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>comply with the relevant threshold could include but are not limited to:</p> <ul style="list-style-type: none"> <li>○ Locating HVAC systems far enough from residences so as to allow noise to attenuate to below the relevant standards</li> <li>○ Installing housings or structural parapets around HVAC systems</li> <li>○ Installing noise-reducing insulation</li> <li>○ Installing windows with STC ratings appropriate to reduce exterior-to-interior noise transmission</li> </ul>	
	<p><i>Public Safety Element Update and Environmental Justice Policies</i></p>	<p>None required.</p>	<p>Less than significant</p>
<p>Impact NOI-2: The Project could generate excessive groundborne vibration or groundborne noise levels.</p>	<p><i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i></p>	<p><b>MM-NOI-3: Reduce construction-generated groundborne vibration to the extent possible.</b></p> <p>The City of Riverside Community &amp; Economic Development Department, Planning Division shall, to the extent possible, require that heavy construction equipment (representative equipment such as large bulldozers) is not operated within 25 feet of onsite or offsite sensitive receptors (including, but not limited to, single- and multi-family residences, institutional or care facilities, etc.). If construction is anticipated within 25 feet of onsite or offsite sensitive receptors, the City shall require pre- and post-construction surveys to confirm that vibration did not result in damage to surrounding structures. Additionally, the City shall require vibration monitoring at the structure to determine if vibration levels exceed the 0.08 PPV threshold at the structure. Should an exceedance be identified, construction would be halted and additional measures would be implemented in order to reduce vibration levels. These additional measures could include, but are not limited to:</p> <ul style="list-style-type: none"> <li>● Using smaller or less vibration-intensive equipment</li> <li>● Maximizing the distance from the vibration source</li> </ul>	<p>Significant and unavoidable</p>



Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Potentially significant	<b>MM-NOI-3: Reduce construction-generated groundborne vibration to the extent possible.</b>	Less than significant
Impact NOI-3: The Project would be in the vicinity of a private airstrip and an airport land use plan, and within 2 miles of a public airport or public use airport but would not expose people residing or working in the City to excessive noise levels.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Less than significant	None required.	N/A
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
<b>Population and Housing</b>				
Impact POP-1: The Project would result in substantial unplanned population growth either directly or indirectly.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Significant and unavoidable	No mitigation is available to reduce this impact to a less-than-significant level.	Significant and unavoidable
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
<b>Public Services</b>				
Impact PS-1: The Project would not result in substantial adverse physical impacts	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and</i>	Less than significant	None required.	N/A

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>associated with the provision of new or physically altered governmental facilities or the 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 following public services:</p> <ul style="list-style-type: none"> <li>a. Fire protection</li> <li>b. Police protection</li> <li>c. Schools</li> <li>d. Other facilities, including libraries</li> </ul>	<p><i>Environmental Justice Policies</i></p> <p><i>Public Safety Element Update and Environmental Justice Policies</i></p>	Less than significant	None required.	N/A
<b>Recreation</b>				
Impact REC-1: The Project could potentially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the	<p><i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i></p> <p><i>Public Safety Element Update and Environmental Justice Policies</i></p>	Less than significant	None required.	Less than significant
		Less than significant	None required.	N/A

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
facility would occur or be accelerated				
Impact REC-2: The Project could include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Less than significant	None required.	N/A
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
<b>Transportation</b>				
Impact TRA-1: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Less than significant	None required.	N/A
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact TRA-2: The Project would conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b), as the Project would affect the VMT in the City of Riverside.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Significant and unavoidable	<b>MM-TRA-1: Implement VMT mitigation options.</b> As individual Opportunity Sites are developed, future development projects shall implement all feasible mitigation measures to reduce VMT.  The amount and type of mitigation needed will vary based on the type and location of projects, as development in some areas of the City will generate VMT that is 15 percent below the existing VMT, some will generate VMT that is 0–15 percent below the City average, and others are in areas with VMT higher than the City average. Figure 3.12-1 shows the VMT per service population for	Significant and unavoidable

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>each transportation analysis zone in the City and summarizes these three different efficiency areas of the City.</p> <p><b>Opportunity Site development projects in very efficient areas</b> (e.g., more than 15 percent below the City average) shown in blue on the figure can be presumed not to have a significant VMT impact and would not need any VMT mitigation due to their location efficiency.</p> <p><b>Opportunity Site development projects in moderately efficient areas</b> (e.g., between 0 percent and 15 percent below the City average) proposed pursuant to the Project shown in yellow on the figure shall incorporate a moderate amount of VMT mitigation. Potential measures for each individual development include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Consider incorporating affordable housing into the Opportunity Site project (expected range of effectiveness 0.04–1.20 percent VMT reduction).<sup>4</sup></li> <li>• Connect the Opportunity Site project to transit, bicycle, and pedestrian facilities (expected range of effectiveness 0.25–0.5 percent VMT reduction).<sup>5</sup></li> <li>• Provide bicycle parking (expected range of effectiveness 0.05–0.14 percent VMT reduction).<sup>5</sup></li> <li>• Consider unbundling parking costs (expected range of effectiveness 2.6–13.0 percent VMT reduction).<sup>5</sup></li> <li>• Provide car-sharing, bike sharing, or ride-sharing programs (expected range of effectiveness 0.4–15.0 percent VMT reduction).<sup>5</sup></li> <li>• Provide transit passes (expected range of effectiveness 0.3–20.0 percent VMT reduction).<sup>5</sup></li> <li>• Increase Opportunity Site project density up to maximum zoning density to the extent feasible (expected range of effectiveness 0.8–30.0 percent VMT reduction).<sup>5</sup></li> </ul>	

<sup>4</sup> Expected range of effectiveness in VMT reduction from *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA 2010). Expected range of effectiveness will vary based on specific project implementation. Measures’ effectiveness will dampen as multiple measures are applied together.

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<ul style="list-style-type: none"> <li>• For Opportunity Site projects that are 2 acres or larger, provide publicly accessible shared-mobility zones.<sup>5</sup></li> </ul> <p><b>Opportunity Site development projects in the least-efficient areas</b> (e.g., higher VMT per service population than the City average) shown in red on the figure shall be subject to the maximum amount of TDM considered feasible in the City. These measures<sup>6</sup> include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Identify measures for moderately efficient areas.</li> <li>• Improve or increase access to transit (expected range of effectiveness 0.5–24.6 percent VMT reduction).<sup>5</sup></li> <li>• Increase access to common goods and services, such as groceries, schools, and daycare (expected range of effectiveness 6.7–20.0 percent VMT reduction).<sup>5</sup></li> <li>• Improve pedestrian or bicycle networks or transit service (expected range of effectiveness 0.02–8.2 percent VMT reduction).<sup>5</sup></li> <li>• For Opportunity Site projects that are 3 acres or larger, provide traffic calming on site in accordance with the Complete Streets Ordinance (expected range of effectiveness 0.25–1.0 percent VMT reduction).<sup>5</sup></li> <li>• Increase connectivity and/or intersection density on the Opportunity Site projects that are 3 or more acres (expected range of effectiveness 3.0–21.3 percent VMT reduction).<sup>5</sup></li> </ul> <p>The maximum total reduction potential for suburban development from TDM strategies described above is 15 percent (CAPCOA 2010). Recent research indicates that other factors such as building tenants play a substantial role in maximum TDM reduction potential. For the City, outside of the Downtown core, a maximum</p>	

<sup>5</sup> The California Air Pollution Control Officers Association does not provide an estimated range of effectiveness for shared-mobility zones.

<sup>6</sup> TDM measures are consistent with those identified in the WRCOG Implementation Pathway Study as documented in the TDM Strategy Assessment (Fehr & Peers 2019).

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation	
		<p>TDM reduction potential of between 3 percent and 5 percent is expected.</p> <p>In addition to onsite TDM measures noted above, Opportunity Sites could potentially contribute to future VMT mitigation fee programs, banks, or exchanges. No regional VMT mitigation programs currently exist; however, if a relevant program that provides VMT mitigation is available through the City, the County of Riverside, or other regional entity, development projects could potentially pay into a fee program or purchase mitigation credits to achieve needed VMT mitigation instead of, or in addition to, onsite TDM measures.</p> <p>It should be noted that the California Air Resources Board’s Scoping Plan has shown that VMT per person has continued to grow throughout California even though the regional 2020–2045 RTP/SCS predicted that VMT would decrease. The Scoping Plan supports two key observations that are relevant to the findings in this EIR:</p> <ol style="list-style-type: none"> <li>1. VMT is influenced by a variety of factors that are outside of local land use control and are not sensitive enough in regional travel demand forecasting tools, including the price of fuel, income levels, and auto accessibility, among other factors.</li> <li>2. California has more ability to influence VMT reduction through legislative action (e.g., VMT tax, increase in fuel tax, vehicle registration fees) than the regional agencies or the City of Riverside Community &amp; Economic Development Department, Planning Division does through their regional planning and local land use authority.</li> </ol>		
<p><i>Public Safety Element Update and Environmental Justice Policies</i></p>	<p>Less than significant</p>	<p>None required.</p>	<p>N/A</p>	
<p><b>Tribal Cultural Resources</b></p>				
<p>Impact TCR-1: The Project could cause a substantial adverse</p>	<p><i>Housing Element Update, Zoning Code and Specific Plan</i></p>	<p>Potentially significant</p>	<p><b>MM-CUL-2: Conduct an archaeological study.</b></p>	<p>Less than significant</p>

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
change in the significance of a tribal cultural resource that has cultural value to a California Native American tribe and that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).	<i>Amendments, and Environmental Justice Policies</i>		<p><b>MM-CUL-3: Avoid archaeological sites through establishment of Environmentally Sensitive Areas (ESAs).</b></p> <p><b>MM-CUL-4: Develop and implement an Archaeological Treatment Plan (ATP) for evaluation of newly discovered and/or unevaluated archaeological resources.</b></p> <p><b>MM-CUL-5: Implement data recovery for CRHR-eligible sites that cannot be avoided.</b></p> <p><b>MM-CUL-6: Retain an on-call archaeologist for monitoring.</b></p> <p><b>MM-CUL-7: Conduct archaeological and Native American monitoring.</b></p> <p><b>MM-CUL-8: Employ procedures for treatment and disposition of cultural resources.</b></p> <p><b>MM-CUL-9: Conduct cultural sensitivity training.</b></p> <p><b>MM-TCR-1: Implement tribal cultural resources protocols and measures determined through consultation.</b></p> <p>During Project-level CEQA review of Opportunity Site projects that would cause a substantial adverse change in the significance of a TCR, the City of Riverside Community &amp; Economic Development Department, Planning Division can and should develop Project-level protocols and mitigation measures with consulting tribes, consistent with PRC Section 21080.3.2(a), to avoid or reduce impacts on TCRs during construction and operation of future Opportunity Site projects. Individual project proponents shall fund the effort to identify these resources through records searches, survey, consultation, or other means, to develop minimization and avoidance methods where possible and to consult with Native American tribes participating in AB 52 consultation to develop mitigation measures for TCRs that may experience substantial adverse changes.</p> <p>In the absence of any specific mitigation measures developed during AB 52 consultation, the City of Riverside Community &amp; Economic Development Department, Planning Division shall develop standard mitigation measures set forth in PRC Section 21084.3(b).</p>	

Potential Environmental Impacts	Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p>The following are standard mitigation measures for TCRs.</p> <ol style="list-style-type: none"> <li>1. Avoid and preserve the resources in place, including, but not limited to, planning and constructing to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria.</li> <li>2. Treat the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to:                             <ol style="list-style-type: none"> <li>a. Protecting the cultural character and integrity of the resource</li> <li>b. Protecting the traditional use of the resource</li> <li>c. Protecting the confidentiality of the resource</li> <li>d. Creating permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places</li> <li>e. Protecting the resource</li> </ol> </li> </ol>	
		<p><b>MM-TCR-2: Conduct consultation with City and applicant.</b>                      Prior to grading permit issuance, if there are any changes to Opportunity Site design and/or proposed grades, the applicant and the City of Riverside Community &amp; Economic Development Department, Planning Division shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur among the City of Riverside Community &amp; Economic Development Department, Planning Division, applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the Opportunity Sites. The City of Riverside Community &amp; Economic Development Department, Planning Division and the applicant shall make all attempts to avoid and/or preserve in place as many cultural resources as possible on the Opportunity Site if the site</p>	



Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe to provide tribal monitoring for ground-disturbing activities. None required.	N/A
Impact TCR-2: The Project could cause a substantial adverse change in the significance of a tribal cultural resource that has cultural value to a California Native American tribe and that is 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).	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Potentially significant	<b>MM-CUL-2: Conduct an archaeological study.</b> <b>MM-CUL-3: Avoid archaeological sites through establishment of Environmentally Sensitive Areas (ESAs).</b> <b>MM-CUL-4: Develop and implement an Archaeological Treatment Plan (ATP) for evaluation of newly discovered and/or unevaluated archaeological resources.</b> <b>MM-CUL-5: Implement data recovery for CRHR-eligible sites that cannot be avoided.</b> <b>MM-CUL-6: Retain an on-call archaeologist for monitoring.</b> <b>MM-CUL-7: Conduct archaeological and Native American monitoring.</b> <b>MM-CUL-8: Employ procedures for treatment and disposition of cultural resources.</b> <b>MM-CUL-9: Conduct cultural sensitivity training.</b> <b>MM-TCR-1: Implement tribal cultural resources protocols and measures determined through consultation.</b> <b>MM-TCR-2: Conduct consultation with City and applicant.</b>	Less than significant
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
<b>Utilities and Service Systems</b>				
Impact UT-1: The Project would not result	<i>Housing Element Update, Zoning Code</i>	Less than significant	None required.	N/A

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities.	<i>and Specific Plan Amendments, and Environmental Justice Policies</i> <i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact UT-2: The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i> <i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A
Impact UT-3: The Project has adequate capacity to serve the Project’s projected wastewater treatment demand in addition to the provider’s existing commitments.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i> <i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A

Potential Environmental Impacts		Level of Significance before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Impact UT-4: The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	<i>Housing Element Update, Zoning Code and Specific Plan Amendments, and Environmental Justice Policies</i>	Less than significant	None required.	N/A
	<i>Public Safety Element Update and Environmental Justice Policies</i>	Less than significant	None required.	N/A

AB = Assembly Bill, AQMP = air quality management plan, BMP = best management practice, CAP = *Economic Prosperity Action Plan and Climate Action Plan*, CARB = California Air Resources Board, CESA = California Endangered Species Act, CNEL = Community Noise Equivalent Level, CRHR = California Register of Historical Resources, dBA = A-weighted decibel, DPM = diesel particulate matter, EPA = U.S. Environmental Protection Agency, FESA = federal Endangered Species Act, GIS = geographic information systems, HRA = health risk assessment, HVAC = heating, ventilating, and air conditioning,  $L_{eq}$  = noise equivalent level, NRHP = National Register of Historic Places, PPV = peak particle velocity, PRC = California Public Resources Code, RMC = Riverside Municipal Code, RTP = Regional Transportation Plan, SCAG = Southern California Association of Governments, SCAQMD = South Coast Air Quality Management District, SCS = Sustainable Communities Strategy, SIP = State Implementation Plan, SOI = Secretary of the Interior, SVP = Society of Vertebrate Paleontology, TCR = tribal cultural resource, TDM = Transportation Demand Management, VMT = vehicle miles traveled, VOC = volatile organic compound, WRCOG = Western Riverside Council of Governments

## ES.5 Significant and Unavoidable Impacts

While the specific mitigation measures summarized above would reduce the level of many significant impacts to a less-than-significant level, the Draft EIR identified the following areas where, after implementation of feasible mitigation, the Project may nonetheless result in impacts that cannot be fully mitigated. Various benefits would accrue from implementation of the Project, which must be weighed against the potential adverse effects of Project implementation in deciding whether to approve the Project. These potential benefits will be set forth in a “Statement of Overriding Considerations,” which is required by CEQA prior to approving a project with unavoidable significant impacts.

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

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

- **Impact TRA-2:** The Project would conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b), as the Project would affect the vehicle miles traveled in the City. This impact would be significant and unavoidable.

## ES.6 Project Alternatives

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

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

## ES.7 Potential Areas of Controversy/Issues to Be Resolved

According to the State CEQA Guidelines, the EIR is required to contain a brief summary that identifies areas of controversy known to the lead agency, including issues raised by agencies and the public (Section 15123(b)(2)); and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects (Section 15123(b)(3)).

Based on the City's review of available information and comments received from the general public and other public agencies in response to the NOP and virtual scoping meeting held on April 22, 2021, the following issues may either be controversial or require resolution:

- CEQA process, environmental review, and environmental justice:
  - Environmental hazards, including contamination sites associated with housing
  - Vehicle miles traveled as a major impact on carbon emissions and air pollution and ways to minimize vehicle miles traveled
  - Impacts on public services and facilities like schools, infrastructure, roads, hospital bed, parking, walkways, public safety, utilities, water, power, sewer, water storage, etc.
  - Race-based environmental impacts with housing near high-pollution areas like freeways and bus stations, and other impacts on environmental justice areas

- Engagement of environmental justice affected communities especially involving the Latin community
- Other cumulative development in adjacent cities
- **Housing-related comments:**
  - Housing Element, RHNA obligation numbers and tracking and reporting of the RHNA goals
  - Number of housing units and their locations within the City
  - Low-income housing
  - Consideration of major City centers like Downtown, Magnolia Center, University, and Arlington and new potential centers to be developed with medium- and high-density and mixed-use development
  - Alternatives considered for accessory DUs
  - Green spaces being incorporated into housing development
  - Transparency regarding demographics in policy development
  - Housing units developed at market versus affordable housing rates

## ES.8 How to Comment on this Draft EIR

The Draft EIR is now being made available for review and comment by public agencies and the public. The review period begins Monday, July 19, 2021, and ends Thursday, September 2, 2021, at 5:00 p.m. Pacific Time. Please submit your comments to the City of Riverside Community & Economic Development Department, Planning Division by the close of the public review period.

Copies of this Draft EIR are available for review at the following locations:

- City of Riverside Community & Economic Development Department, Planning Division, 3900 Main Street, 3<sup>rd</sup> Floor Riverside, CA 92522
- Riverside Public Library
  - Main Branch: 3900 Mission Inn Avenue
  - Arlington Branch: 9556 Magnolia Avenue
  - Arlanza Branch: 8267 Philbin Avenue
  - SSgt. Salvador J. Lara Casa Blanca Branch: 2958 Madison Street
  - Spc. Jesus S. Duran Eastside Branch: 4033 Chicago Avenue, Suite C
  - La Sierra Branch: 4600 La Sierra Avenue
  - Orange Terrace Branch: 20010 Orange Terrace Parkway

The Draft EIR is also available online at the City of Riverside Community & Economic Development Department's website.

- <https://riversideca.gov/cedd/planning/riverside-housing-public-safety-element-and-environmental-justice-approach>

The Project will be discussed, and public comments can be provided during a Planning Commission meeting scheduled for August 5, 2021, beginning at 9 a.m. in the Art Pick Council Chamber. Agencies and the public are invited to attend and provide comments during the meeting.

All written comments should be directed to:

Matthew Taylor, Senior Planner  
City of Riverside Community & Economic Development Department, Planning Division  
3900 Main Street, 3rd Floor  
Riverside, CA 92522  
Email: [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov)

After consideration of public comments, the City will prepare and publish responses to comments it received on the environmental effects of the Project. The Final EIR will then be considered by the City of Riverside Planning Commission prior to deciding to approve, approve with modification, or reject the Project. Following Planning Commission recommendation, the Riverside City Council will consider certifying the Final EIR and adopting required findings in conjunction with Project approval.





# Introduction and Scope of Environmental Impact Report

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The City of Riverside (City) has prepared this draft environmental impact report (EIR) to evaluate the potential environmental impacts related to the implementation of Phase 1 update of *Riverside General Plan 2025*, consisting of the Housing and Public Safety Element Updates and Environmental Justice Policies (Project). The Project includes (1) adopting and implementing the Housing Element Update for the 2021–2029 planning period; (2) adopting and implementing a Public Safety Element Update; (3) developing associated Environmental Justice Policies; and (4) updating the Zoning Code and multiple Specific Plans to address the requirements of the 6<sup>th</sup> Regional Housing Needs Assessment cycle. The City is the lead agency under the California Environmental Quality Act (CEQA) for the preparation of the EIR and will be taking primary responsibility for conducting the environmental review and certifying the EIR.

The EIR includes an analysis of the potentially significant environmental impacts that could occur as a result of implementing the Project and is meant to inform agencies and the public of any significant environmental effects associated with the Project, describe and evaluate reasonable alternatives to the Project, and propose mitigation measures that would avoid or reduce any significant effects associated with the Project.

## 1.1 Public Engagement During the Project and Environmental Review Process

### 1.1.1 Informational Meetings and Policy Workshops

Prior to the start of the CEQA process, several public meetings were held to engage agencies and the public during the development phase of the Project to inform the community of the Project details and to solicit input and feedback. Three total public informational meetings were held virtually. The first meeting occurred on January 7, 2021, with the intent to introduce the Project to the community and describe the potential locations of Opportunity Sites to be evaluated as potential locations for future housing and mixed-use development in the City associated with the Housing Element Update. The second workshop was held on January 27, 2021, to introduce and solicit input on three potential Regional Housing Needs Assessment (RHNA) scenarios for the development of the preferred alternative to eventually be selected as the Project. The final informational meeting was held on February 25, 2021, detailing the preferred alternative to be evaluated as the Project in this EIR. During each of these meetings, the CEQA process was introduced to the community and comments and questions were provided by the audience and were addressed during the meetings.

Two policy workshops were also held to solicit input from the community on the draft policies and actions for the individual components of the Project. A workshop held on June 10, 2021, was focused on soliciting feedback on the draft policies and actions for the Public Safety Element and Environmental Justice Policies. A second workshop was held on June 17, 2021, to solicit input on the draft policies and actions for the Housing Element Update and Environmental Justice Policies.

## 1.1.2 CEQA-Focused Meetings and Summary of Comments

The City prepared a Notice of Preparation (NOP) of a Draft EIR and distributed it for the required 30-day agency and public review period on April 5, 2021. The City received seven written responses to the NOP during the public review period. The NOP and an Initial Study prepared for the Project and the NOP responses received are included in Appendix A. The intent of the NOP was to provide interested individuals, groups, public agencies, and others a forum to provide input to the City regarding the scope and focus of the EIR. A virtual scoping meeting was held on April 22, 2021, at which time the public was given an additional opportunity to comment on the issues to be analyzed in the EIR. Table 1-1 lists the issues relevant to the EIR that were brought up in the NOP written comments, as well as the EIR sections where the issues are addressed.

**Table 1-1. NOP Comments and EIR Response**

Commenter	Comment/Request	Where It Was Addressed
Agua Caliente Band of Cahuilla Indians	Copies of any cultural resource documentation (report and site records) generated in connection with this Project.	Section 3.3, <i>Cultural Resources</i> ; Section 3.13, <i>Tribal Cultural Resources</i>
Robin Whittington	Consideration of the average number of vehicles per unit and just where and what will accommodate them. Project would create a greater hazard for people walking, on bikes, and on horses. Increased traffic would be detrimental to emergency vehicle access. Strained utilities (electricity, gas, water, etc.) because of the increase in housing and population.	Section 3.10, <i>Public Services</i> ; Section 3.12, <i>Transportation</i> ; Section 3.15, <i>Effects Not Found to Be Significant</i>
Mary Humboldt	The Project would decrease agriculture and open space with more housing. Environmental and economic injustice by gentrifying the City. Air quality will decrease from an increase of population that has to commute to work. Traffic is already congested under existing conditions. Open space and parks are already congested. Libraries are underfunded. Project would increase the number of renters that would decrease the quality of life and neighborhood stability. The Project would densify the City, which would violate voter initiatives.	Section 3.1, <i>Air Quality</i> ; Section 3.10, <i>Public Services</i> ; Section 3.11, <i>Recreation</i> ; Section 3.12, <i>Transportation</i> ; Section 3.15, <i>Effects Not Found to Be Significant</i>
Elizabeth Pinney Muglia	Questions regarding any existing City environmental justice (EJ) policies, particularly regarding disadvantaged communities; comparison of existing policies compared to advocacy group recommendations or to other jurisdictions; mechanisms in place to enforce EJ policies; plans to have a public meeting to review EJ efforts; address limitations of Ward 4; and review Proposition R and Measure C voter initiatives as a practice of exclusionary zoning. Recommendations include having a map of opportunity sites with contamination sites; using CalEnviroScreen to map EJ communities and consider zoning overlays; using SB 330 to create opportunities for multifamily zoning; and having more City engagement/initiatives to fund additional public transit and expansion of transit corridors for housing.	Chapter 1, <i>Introduction and Scope of Environmental Impact Report</i> ; Chapter 2, <i>Project Description</i> ; Section 3.6, <i>Hazards and Hazardous Materials</i> ; Section 3.7, <i>Land Use and Planning</i> ; Section 3.9, <i>Population and Housing</i>

Commenter	Comment/Request	Where It Was Addressed
Native American Heritage Commission	Recommends consultation with local tribes in accordance with Senate Bill 18 and Assembly Bill 52.	Section 3.3, <i>Cultural Resources</i> ; Section 3.13, <i>Tribal Cultural Resources</i>
Southern California Association of Governments	Recommends a consistency table with Connect SoCal goals. Recommends a review of the Final Program EIR for Connect SoCal for mitigation measure guidance, as appropriate. Recommends preparing the Housing Element before the California Department of Housing and Community Development October 15, 2021, deadline.	Section 3.7, <i>Land Use and Planning</i> ; Section 3.9, <i>Population and Housing</i>
South Coast Air Quality Management District (SCAQMD)	Recommends that the lead agency use SCAQMD's CEQA Air Quality Handbook and website as guidance. Recommends that the lead agency use the CalEEMod land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association. Recommends that the lead agency quantify criteria pollutant emissions and compare the emissions to SCAQMD's CEQA regional pollutant emissions significance thresholds and localized significance thresholds. Recommends the lead agency identify any potential adverse air quality impacts that could occur from all phases of the proposed Project and all air pollutant sources related to the proposed Project. If the proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. In the event that the proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts.	Section 3.1, <i>Air Quality</i> ; Section 3.5, <i>Greenhouse Gas Emissions</i>

Public comments provided during the scoping meeting on April 22, 2021, included the following comments, separated into two categories of comments and questions:

- CEQA process, environmental review, and environmental justice:
  - Purpose of a scoping meeting
  - Mapping contamination sites
  - Environmental hazards associated with housing
  - Vehicle miles traveled as a major impact on carbon emissions and air pollution and ways to minimize vehicle miles traveled
  - Inclusion of the Northside Specific Plan in the EIR
  - Impacts on schools
  - Impacts on environmental justice areas

- Impacts related to parking, roadways, and lack of walkways
- Impacts on property values
- Evaluation of impacts on City services like public safety, utilities, sewer, etc.
- Race-based environmental impacts with housing near high-pollution areas like freeways and bus stations
- Funding of infrastructure, roads, water, power, hospital beds, and schools
- Consideration of major public works projects for water storage
- Other cumulative development in adjacent cities (i.e., Colton)
- Engagement of environmental justice communities especially involving the Latin community
- Potential changes to the existing *Riverside General Plan 2025* or local Specific Plans
- Housing-related comments:
  - Housing Element and RHNA obligation numbers
  - Results of the last RHNA cycle
  - Tracking and reporting of the proposed RHNA goals
  - Low-income housing
  - Number of elected officials in attendance at the meeting
  - Number of housing anticipated in Ward 1
  - Housing sites required only on Opportunity Sites
  - Consideration of major City centers like Downtown, Magnolia Center, University, and Arlington and new potential centers to be developed with medium- and high-density and mixed-use development
  - Alternatives considered for accessory dwelling units
  - Green spaces being incorporated into housing development
  - Transparency regarding demographics in policy development
  - Housing units to be developed at market versus affordable housing rates

## 1.2 The California Environmental Quality Act

The preparation of an EIR is guided by the CEQA statutes and guidelines. CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of proposed activities and the ways to avoid or reduce those effects by requiring implementation of feasible alternatives or mitigation measures. CEQA applies to all California government agencies at all levels, including local government agencies that must issue permits or provide discretionary approvals for projects proposed by private applicants. As such, the City is required to undertake the CEQA process before making a decision about the Project.

This EIR has been prepared pursuant to CEQA and the State CEQA Guidelines (14 California Code of Regulations 15000 et seq.). The purpose of this EIR is to analyze the environmental impacts of the

Project, indicate ways to reduce or avoid potential environmental damage of the Project, and identify alternatives. CEQA requires that each public agency mitigate or avoid the significant environmental effects of projects it approves or implements whenever feasible.

The Draft EIR must disclose environmental effects, including those that cannot be avoided; growth-inducing effects; effects found not to be significant; and significant cumulative impacts of all past, present, and reasonably anticipated future projects. The EIR neither approves nor denies a project. A public agency may approve a project, even if it would result in significant and unavoidable environmental impacts.

### 1.2.1 Level of Detail in this EIR

The level of detail in the Draft EIR matches the level of detail available in the plans available for the Project. The EIR contains analysis of the Project's potential impacts on the environment. The mitigation measures identified in the EIR are sufficiently detailed to ensure that they will be effectively carried out to reduce the Project's impacts.

It should be noted that this is a programmatic EIR, and, as such, does not identify specific development projects that could occur as a result of approval of the Project. The Project would not provide individual project approvals or entitlements for any specific private or public development or infrastructure project. While this EIR does not preclude future environmental review required under CEQA for subsequent development projects (i.e., Opportunity Sites), the analysis in this EIR and provision of program-level mitigation measures would streamline further CEQA review for specific projects to support facilitation of future development of individual Opportunity Sites. Projects that are within the scope of the analysis of this EIR, whereby all Project-specific impacts could be adequately minimized or avoided through application of program-level mitigation, may be able to proceed without subsequent CEQA documentation. A predevelopment checklist (environmental development checklist) will be developed as part of the Project to support the development review process for applicants proposing development on Opportunity Sites that is consistent with the Project.

### 1.2.2 Document Format

The content and organization of this Draft EIR are designed to meet the current requirements of CEQA and the State CEQA Guidelines. The Draft EIR is organized as described below.

**Executive Summary** presents a summary of the Project and alternatives, potential impacts and mitigation measures, and conclusions regarding growth inducement and cumulative impacts.

**Chapter 1, Introduction and Scope of Environmental Impact Report**, provides an overview of the EIR process, describes the purpose and scope of this Draft EIR, and outlines required Draft EIR contents and organization.

**Chapter 2, Project Description**, describes the Project location, Project details, and objectives for the Project.

**Chapter 3, Impact Analysis**, describes the existing conditions for each environmental issue before Project implementation, methods and assumptions used in the impact analysis, criteria for determining significance, impacts that would result from the Project, and applicable mitigation measures that would eliminate or reduce significant impacts. Chapter 3 is divided into Sections 3.1–

3.16, with each section focusing on a specific environmental resource topic. Section 3.16, *Cumulative Impacts*, describes impacts that could occur from the combined effect of the Project and other past, present, and reasonably foreseeable future development projects.

**Chapter 4, Alternatives**, describes a range of feasible alternatives to the Project, including no project, that would reduce one or more of the Project's potential environmental impacts.

**Chapter 5, Other CEQA Considerations**, describes direct and indirect growth-inducing impacts that could be caused by the Project. In addition, this chapter includes a discussion of significant adverse impacts that cannot be reduced to less-than-significant levels due to unavailable or infeasible mitigation measures, as well as irreversible commitments of resources caused by the Project.

**Chapter 6, List of Preparers**, lists the individuals involved in preparing this Draft EIR.

**Chapter 7, References**, lists the references used in the preparation of this Draft EIR.

**Appendices** provide information and technical studies that support the environmental analysis contained within this document.

## 1.3 Intended Use of this EIR

This Draft EIR provides the primary source of environmental information for the City and other public agencies to consider when exercising any permitting authority or approval power directly related to implementation of the Project. As stated in the State CEQA Guidelines, Section 15121(a):

An EIR is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.

## 1.4 Reviewing an EIR

### 1.4.1 Making Effective Comments

Readers are invited to review and comment on the adequacy and completeness of this Draft EIR in describing the potential impacts of the Project, their level of severity, the mitigation measures being proposed to reduce or avoid those impacts, and the Project alternatives being considered. The most effective comments are those that focus on the adequacy and completeness of the environmental analysis and that are supported by factual evidence. Comments that focus on whether the Project should be approved or denied are not comments on the adequacy of the Draft EIR.

### 1.4.2 Submitting Comments

Written comments are to be submitted by mail or e-mail to the following address:

Community & Economic Development Department, Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor, Riverside, CA 92522

Attention: Matthew Taylor, Senior Planner  
E-mail: [mtaylor@riversideca.gov](mailto:mtaylor@riversideca.gov)

## 1.5 Final EIR

After the end of the review period, the City will review the comments received, prepare written responses to those comments, make any related revisions to the Draft EIR, and publish the Final EIR. The Final EIR will be considered by the City decision-makers when taking action on the Project.

If the Project is approved, CEQA requires the City to adopt findings describing how each of the significant impacts identified in the EIR is being mitigated. The findings will describe the reasons why significant unavoidable impacts, if any, cannot be mitigated. The findings will also describe the reasons why Project alternatives that were analyzed in the EIR have not been adopted. If the Project has significant and unavoidable impacts, the City will also adopt a statement of overriding considerations describing the benefits of the Project that outweigh its environmental impacts. Finally, the City will adopt a mitigation monitoring and reporting plan that describes how it will ensure the mitigation measures being required of the Project will be carried out.

If the Project is denied, no additional CEQA action is required of the City.





## 2.1 Introduction

The City of Riverside (City) is proposing the Project. The Project includes (1) adopting and implementing an update of the Housing Element for the 2021–2029 planning period; (2) adopting and implementing a Public Safety Element Update; (3) developing associated Environmental Justice Policies; and (4) updating the Zoning Code and Specific Plans to address the requirements of the 6<sup>th</sup> Regional Housing Needs Assessment (RHNA) cycle. The Project is intended to accommodate the City’s RHNA obligation of 18,458 dwelling units (DUs), plus approximately 30 percent (approximately 5,500 DUs) to comply with Senate Bill (SB) 166 (No Net Loss) requirements, for an overall goal of 24,000 DUs. The Project involves 239 acres that do not require zoning changes and 581 acres that would require *Riverside General Plan 2025* (GP 2025) amendments, Zoning Code changes, and Specific Plan amendments, for a total of 870 parcels comprising 820 acres. The implementation of this Project could result in an increase of up to 31,564 new DUs<sup>1</sup> and 3,181,930 square feet of nonresidential development, or up to 31,175 DUs and 1,433,460 square feet over existing conditions.

This chapter of the EIR provides a description of the Project. It also describes the requirements of CEQA and other regulatory considerations for the development of the Project. The analysis of the alternatives to the Project are discussed in Chapter 4, *Alternatives*.

## 2.1 Project Location and Setting

The 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, a major regional freeway, traverses the City in an east-west orientation, while State Route 60 and Interstate 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 proximate to Riverside, but outside the City limits. Figure 2-1 illustrates the regional context for the City, and Figure 2-2 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, and Woodcrest, and limited

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<sup>1</sup> For the purposes of CEQA, assumes that sites identified for housing development are developed to 75 percent of maximum zoned capacity.

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 GP 2025. A component of the Housing Element Update is a rezoning program that involves multiple sites identified for future housing and mixed-use development and Specific Plan amendments at various locations in all parts of the City. Environmental Justice Policies are an additional component of the Project. The geographic setting for the Project is the entire City. Figure 2-3 illustrates the GP 2025 land use designations.

### 2.1.1 Background

The City has a population of approximately 324,302 persons as of January 2021 (Department of Finance 2021). 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 historically 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*, the City has a projected population of 383,077 persons at general plan build-out (2025), including 346,867 persons within City limits and 36,210 persons within the City's SOI (City of Riverside 2007). According to the Southern California Association of Governments, the City's population is projected to increase to 395,800 by 2045 (SCAG 2020).

According to California Department of Finance estimates, as of January 2020, the City's housing stock was estimated at 101,414 DUs, with a projected increase to 115,100 DUs by 2045 (SCAG 2020). Single-family detached units compose the majority (68 percent) of housing in the City. Within this general category, single-family DUs 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.

State law requires each city and county to adopt a general plan containing at least eight elements, including a housing element, although each jurisdiction can establish its general plan elements in a way that best fits its individual needs. The housing element, required to be updated regularly, is subject to detailed statutory requirements and mandatory review by the California Department of Housing and Community Development. Housing and Public Safety are two of the 12 elements that constitute GP 2025. GP 2025 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. GP 2025 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 Project. An update to the Public

Figure 2-1  
Regional Vicinity Map

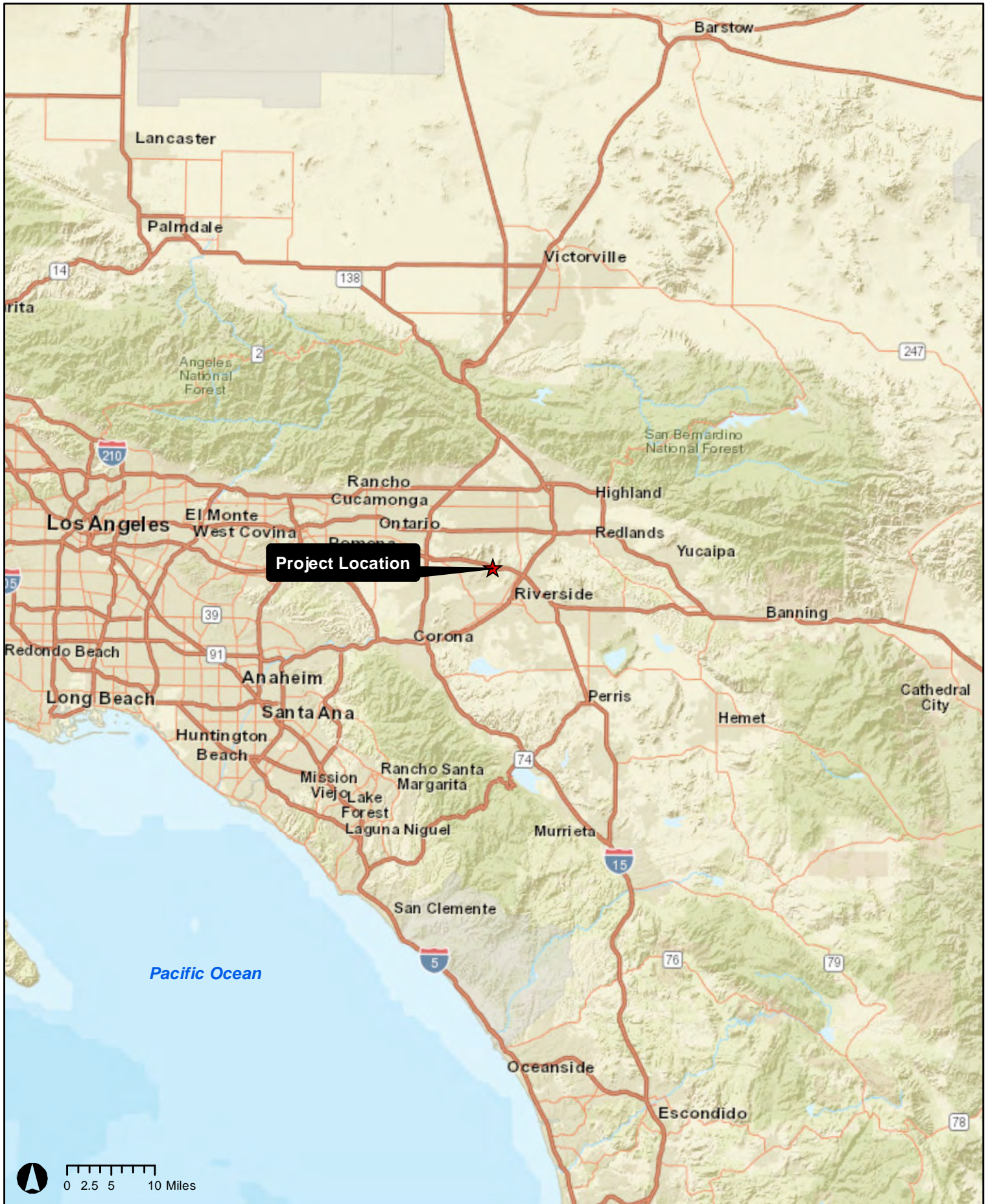




Figure 2-2  
Local Vicinity Map

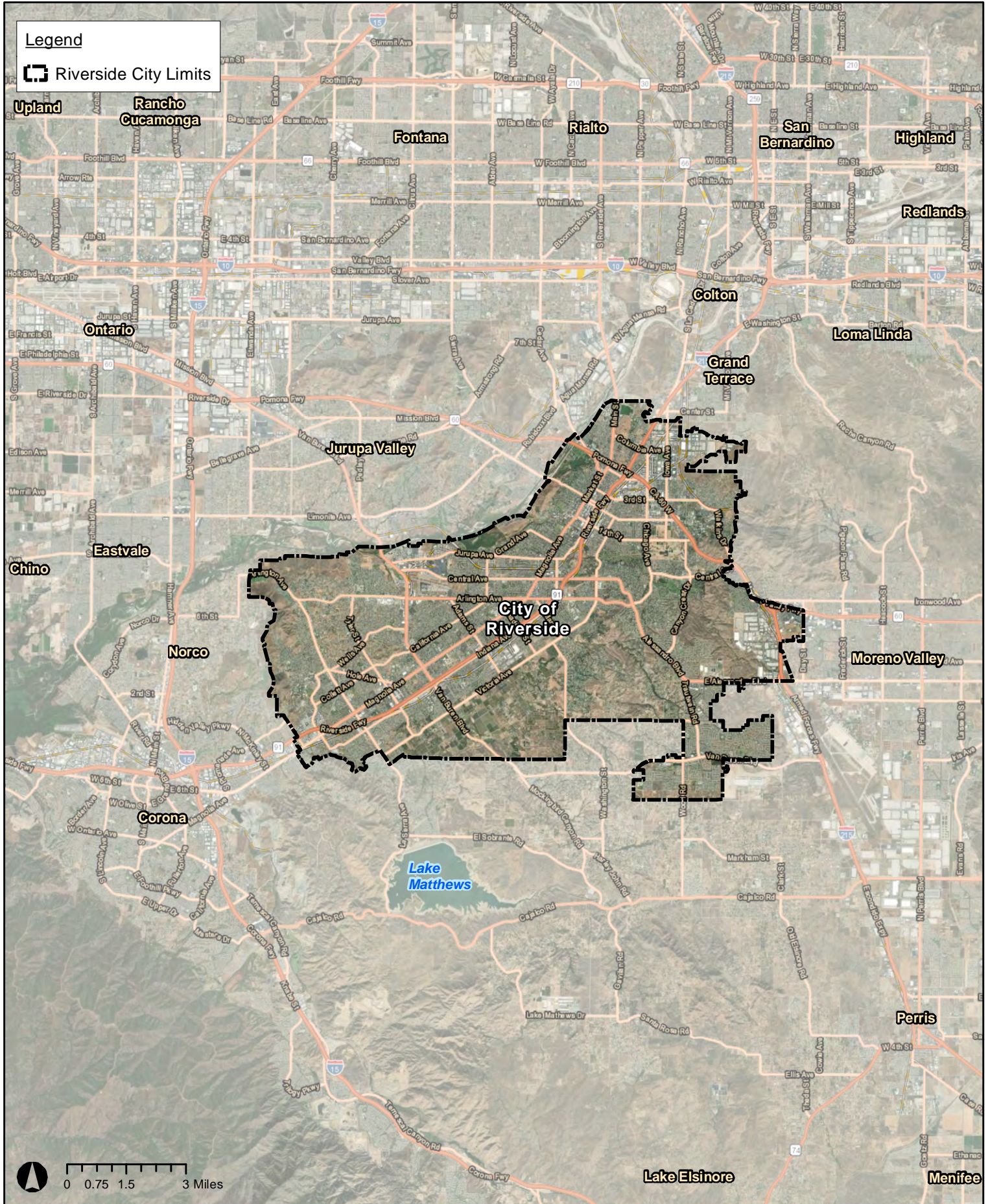
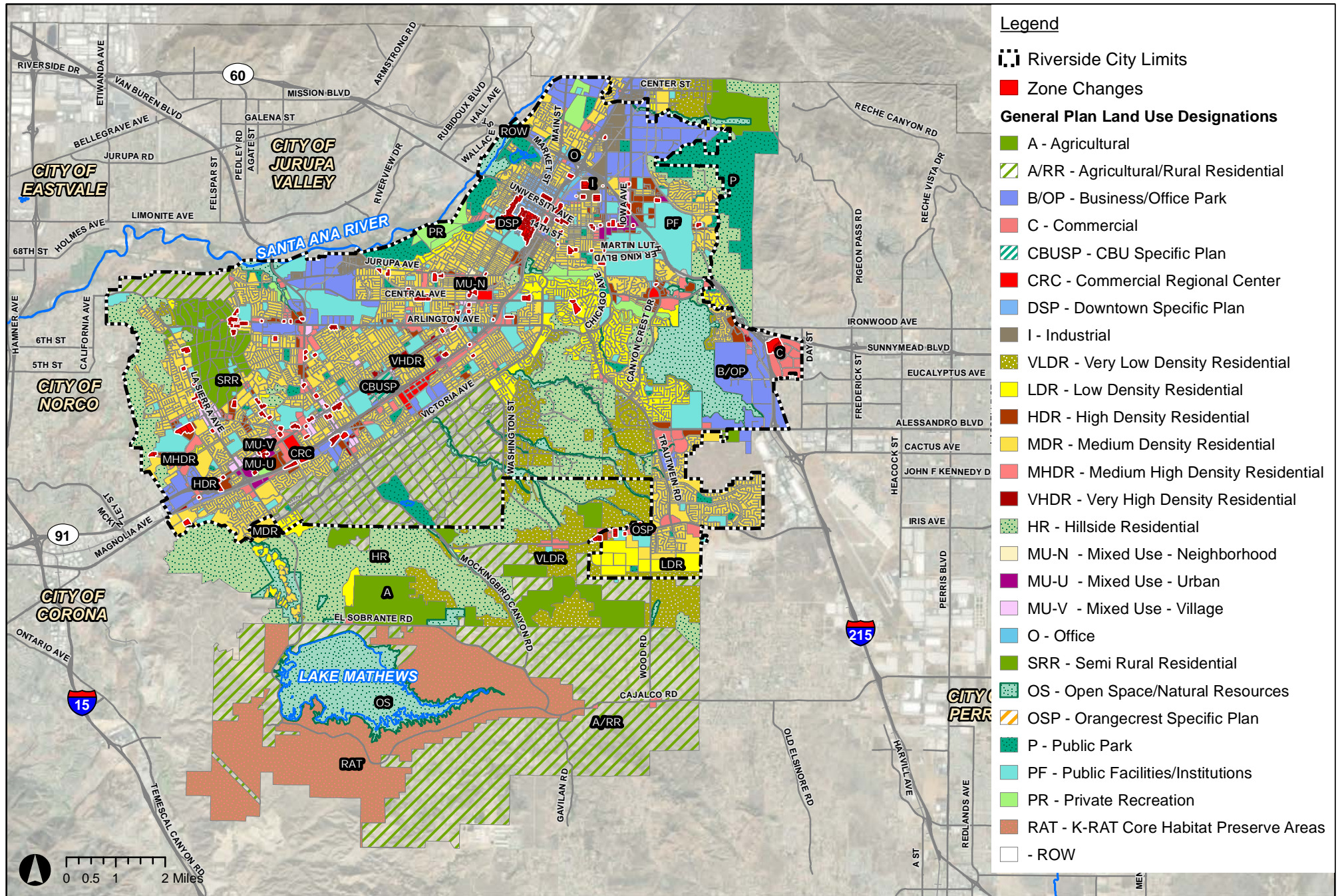




Figure 2-3  
Existing General Plan Land Use Designations







Safety Element is required at the time the Housing Element is updated, per SB 1035.<sup>2</sup> The Project is the first phase of an overall update to GP 2025. Once this phase has been completed, the City will pursue comprehensively updating the remaining 10 elements of GP 2025 as a separate project during a later phase.

## 2.1.2 Regional Housing Needs Assessment (RHNA)

The statewide 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 obligation and to assist with addressing existing and future housing needs. The City last updated the Housing Element in 2018 as a mid-5<sup>th</sup> cycle revision.

The Housing Element cycle covering the 2013–2021 period included an RHNA obligation of 8,283 units, of which only a portion were built during the last 8 years. The City’s previous Housing Element was adopted in 2017 and runs through 2021. This update cycle comes when California faces a major statewide housing shortage that is affecting all Californians by raising the price of housing and the cost of construction, and by increasing homelessness. In the 2021–2029 Housing Element cycle (6<sup>th</sup> cycle), the City’s RHNA obligation is a minimum of 18,458 new housing units. Given that 100 percent of potential housing sites will likely not be developed to full potential, the City has provided a buffer of approximately 5,500 DUs (approximately 30 percent over and above the RHNA obligation). Altogether, the City will identify space for up to 24,000 new homes for the 2021–2029 RHNA cycle.

## 2.1.3 Environmental Justice Requirements

The Project includes a series of proposed GP 2025 policies and implementing actions that promote environmental justice within the City. As defined by the U.S. Environmental Protection Agency (2021), *environmental justice* is “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of laws, regulations, and policies.” The need to promote environmental justice within and beyond California’s communities has arisen out of a history of disproportionate environmental harm borne by low-income and minority populations due to compounded exposure to environmental hazards, often leading to adverse health outcomes and compromised quality of life.

SB 1000 amended California Government Code Section 65302 to require that both cities and counties that have environmental justice communities, as defined, incorporate environmental

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<sup>2</sup> State Bill No. 1035, Jackson. General plans. The Planning and Zoning Law requires the legislative body of a city or county to adopt a comprehensive, long-term general plan that includes various elements, including, among others, a housing element and a safety element for the protection of the community from unreasonable risks associated with the effects of various geologic and seismic hazards, flooding, and wildland and urban fires. Existing law requires the housing element to be revised according to a specific schedule. Existing law requires, after the initial revision of the safety element to identify flood hazards and address the risk of fire in certain lands upon each revision of the housing element, the planning agency to review and, if necessary, revise the safety element to identify new information relating to flood and fire hazards that was not previously available during the previous revision of the safety element. Existing law also requires the safety element to be reviewed and updated as necessary to address climate adaptation and resiliency strategies applicable to the city or county.

justice policies into their general plans, either in a separate environmental justice element or by integrating related goals, policies, and objectives throughout the other elements upon the adoption or next revision of two or more elements concurrently. The purpose of the legislation is to address the “unique or compounded health risks” in environmental justice communities by decreasing pollution exposure, increasing community assets, and improving overall health. To address disproportionate effects and to comply with SB 1000, policies and actions are incorporated within each element of GP 2025, with the goal of affording affected communities an equal level of protection from environmental and health hazards and enhanced opportunities to engage in decision-making that affects environmental quality and health outcomes.

Environmental justice communities are those communities that fit either of the definitions below:

- Areas identified by the California Environmental Protection Agency as “(1) areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation”; or “(2) areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment” (California Code, Health and Safety Code Section 39711)
- Low-income areas that are “disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation” (Gov. Code, § 65302, subdivision (h)(4)(A))

Environmental justice communities within the City were identified using the California Communities Environmental Health Screening Tool (CalEnviroScreen), a data tool developed by the California Environmental Protection Agency’s Office of Environmental Health Hazard Assessment pursuant to Health and Safety Code Section 39711 and other statutory requirements. CalEnviroScreen provides statewide data that can be used to identify communities disproportionately affected by, or vulnerable to, environmental pollution and contaminants. The mapping tool contains 12 indicators related to pollution burden and eight indicators that track population characteristics and other vulnerabilities.

## 2.1.4 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. The process of identifying the Opportunity Sites involved eliminating sites with significant constraints to development. 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 Opportunity Sites. As the Project includes Zoning Code and Specific Plan amendments that affect a larger area than the Opportunity Sites, overall, the identified Opportunity Sites, with Zoning Code and Specific Plan amendments, could accommodate up to 31,564 housing units. Opportunity Sites are illustrated on Figure 2-4.

The Innovation District (shown on Figure 2-5) connects cutting-edge businesses with infrastructure and close-at-hand resources, builds off the character of historic and culturally rich neighborhoods, connects blue-collar workers to high-paying jobs, and contributes to the growth of affordable, eco-friendly public transportation. Residents will benefit from the diversification of housing options in their area, and the aim is to maintain affordable housing while creating opportunity for all residents

Figure 2-4  
Opportunity Sites

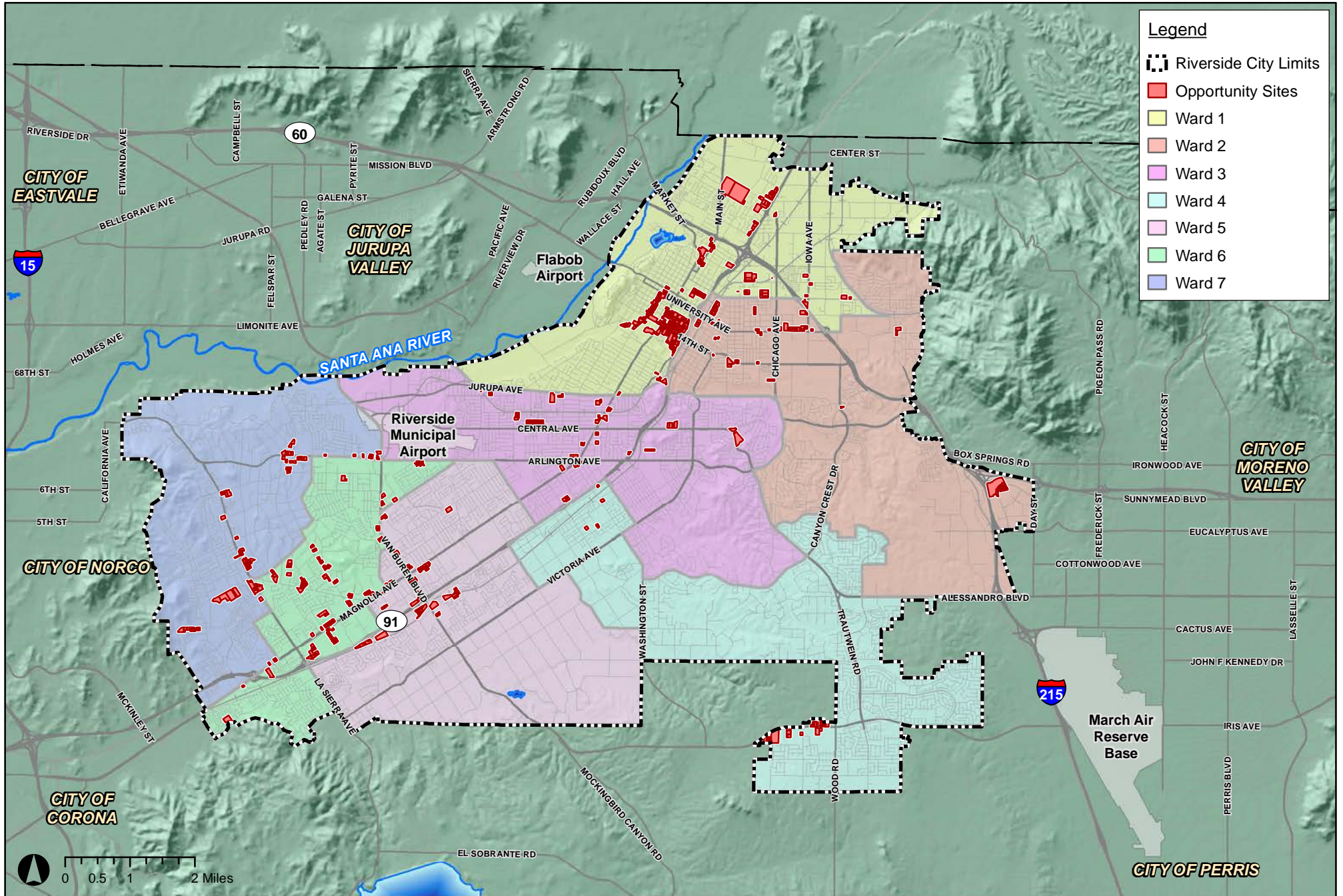
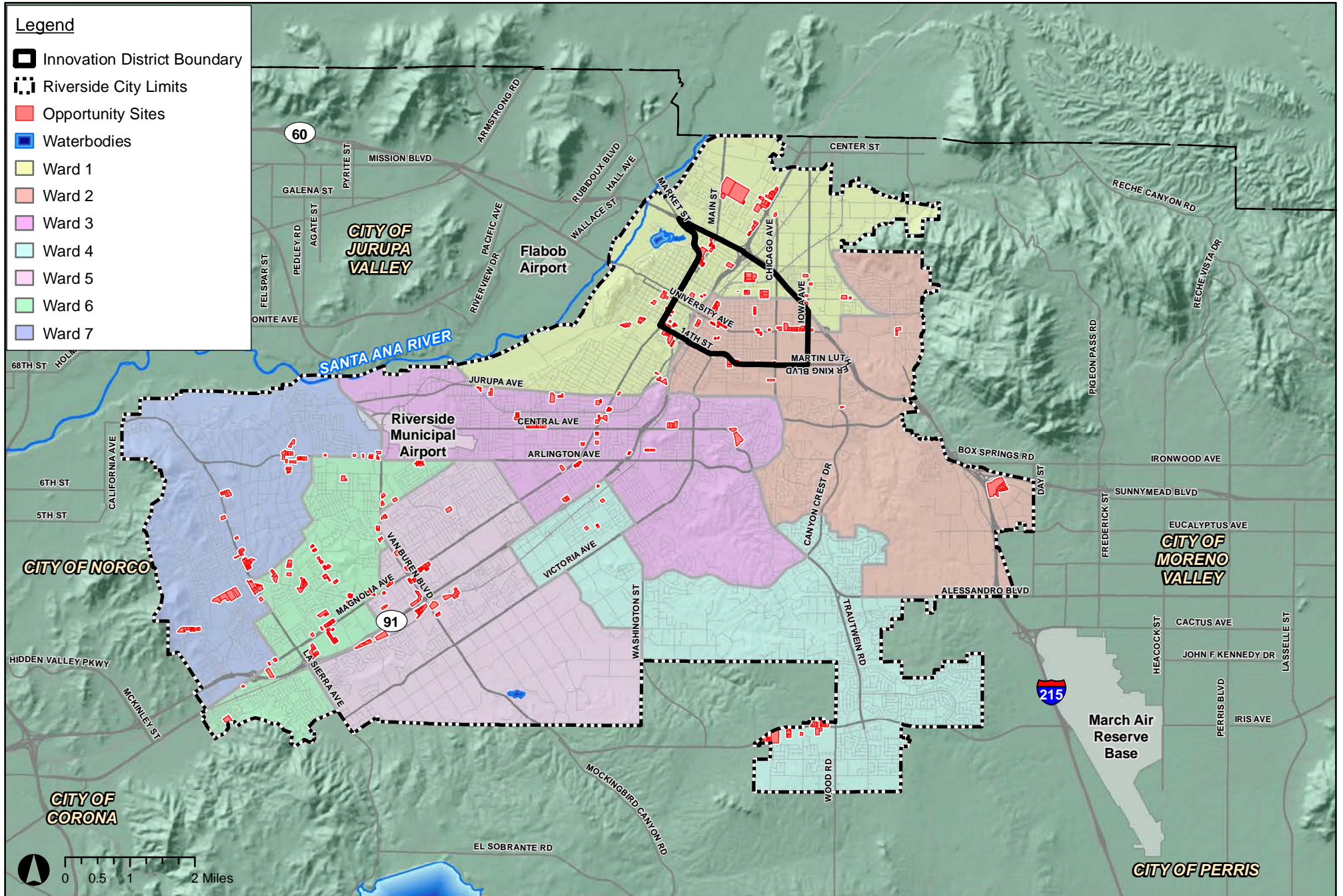




Figure 2-5  
 Opportunity Sites within the Innovation District





to participate meaningfully in the economy. Specific development sites within the Innovation District are not identified, in order to give the City maximum flexibility in development in this area. Therefore, the development planned for the Innovation District is more generally described as providing up to 6,980 residential units and 7,758,000 square feet of nonresidential uses.

The Opportunity Sites inventory analysis was initially conducted using a data-driven process to identify 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 the County of Riverside. 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, except for large sites located on arterial corridors with access to services and amenities.
- **General Plan Land Use** looks at what is allowed within the general designation, which may allow for future housing 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 the County of Riverside 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 6<sup>th</sup> cycle RHNA process. Lots with an area less than 0.5 acre are considered too small to produce enough housing to support affordability. Lots larger than 10 acres were considered too expensive for affordable housing developers to purchase. Therefore, the analysis looked for properties greater than 0.5 acre and smaller than 10 acres, with exceptions for sites in strategic locations with unique development potential.
- **Lot Vacancy** is a key driver for identifying potential opportunity sites because of the ease of developing housing on vacant lots. Geographic information system data on existing land use information were used and manually verified to ensure accuracy.
- **Underutilization Index** determines a site's build potential and compares it to what exists on the site currently. The index assesses the amount of actual lot coverage, actual building height, and actual floor area developed on a property and compares the existing to what could be allowed under the current zoning. The greater the difference between the existing conditions and what is allowed, the greater the property is underutilized and is, therefore, a candidate for redevelopment.

- **Airport Compatibility Zones** constraints remove properties from consideration if the properties are in the most restrictive airport land use areas: A, B1, B2, C, C1, and C2 as set forth in the Riverside County Airport Land Use Compatibility Plan.
- **Current Zoning** identifies the current zoning designation of the potential Opportunity Sites.
- **City Opportunity Sites** contain a list of target sites identified by the City for consideration based on City staff's expert local knowledge.
- **Pipeline Projects** contain a list of active development projects known and currently tracked by the City. These sites were eliminated from consideration.
- **5<sup>th</sup> Cycle RHNA Sites** were automatically included in the analysis as long as the sites were not already developed.
- A **Manual Override Flag** was used to include or exclude properties based on detailed manual evaluation of each site for characteristics or conditions not captured by the methods described above.

A predevelopment checklist (environmental development checklist) will be developed as part of the Project to support the development review process for applicants proposing Opportunity Sites that are consistent with the Project.

## 2.2 Project Objectives

Objectives of the Project are:

- Plan for a maximum allowable development under the Project (31,564 units) to meet the City's minimum RHNA obligation (18,458 units with a 30 percent No Net Loss buffer for approximately 24,000 units) across all wards.
- Affirmatively further fair housing and identify potential environmental justice and social equity issues to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children.
- Ensure affordable housing is added across the City and not concentrated in areas with lower access to amenities or near sources of pollution.
- Add a variety of housing opportunities that will make Riverside a more accessible and resilient community.
- Locate new housing in areas readily accessible to services, parks and other amenities, transit, jobs, and activity centers.
- Identify vacant or under-developed sites, meaning sites with substantial unused land or development potential.
- Limit or prevent housing development in areas with development constraints, such as agricultural and conservation lands, airport influence areas, and, to the extent feasible, fire and flood hazard zones.
- Address the public safety and public health needs and concerns of 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 incompatible land uses, along major corridors, or near similar uses.

## 2.2.1 Project Description

The Project, as noted, consists of several components: Housing Element Update, Public Safety Element Update, GP 2025 amendments, Zoning Code amendments, and several Specific Plan amendments. Environmental Justice Policies will be included in both element updates. Details concerning each of these components are discussed below. Proposed policies and implementing actions to be incorporated in the element updates are included in Appendix B.

## 2.2.2 Housing Element Update

The Housing Element Update addresses changes that have occurred since adoption of the 5<sup>th</sup> cycle (2014–2021) Housing Element. These changes include updated demographic information, housing needs data, and analysis of the availability of sites for potential future housing development (Opportunity Sites). The locations of available Opportunity Sites in the Housing Element have been updated to identify sites that accommodate the City’s RHNA for the 2021–2029 planning period (6<sup>th</sup> cycle). The Project would also amend the GP 2025 land use and Specific Plan designations and rezone sites to accommodate the changes specified in the Housing Element Update.

The Housing Element identifies policies and actions that focus on:

- Matching housing supply with need
- Maximizing housing choice throughout the community
- Assisting in providing affordable housing
- Removing governmental and other constraints to housing production
- Promoting fair and equitable housing opportunities for all

The main components of the Housing Element Update are required by Government Code Section 65583 and 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 policies and actions, and a full list of programs that will help the City carry out the policies
- A list of Opportunity 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. As part of the analysis, 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 and arroyos
- Of known soil or groundwater contamination

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

Because the Housing Element is updated every 8 years, the 5<sup>th</sup> cycle Housing Element provides a foundation for this 6<sup>th</sup> 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.

The Housing Element is organized into two primary pieces: the Housing Plan and the Technical Background Report. The Housing Plan outlines the City’s commitment to providing and preserving housing opportunities in the community. The Background Technical Report supports the Housing Plan.

### 2.2.3 Public Safety Element Update

The Project also includes an update to the GP 2025 Public Safety Element to incorporate information on natural and human-caused hazards, along with new policies related to environmental justice, climate change, and pandemic preparedness and response, among others. The purpose of the 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 material spills, crime reduction, and response to global pandemics like COVID-19—are 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 GP 2025. 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 updated Public Safety Element identifies public safety issues and needs anticipated to be of ongoing concern to people in the City and 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.

The guiding principle and policies that are proposed for inclusion in the Public Safety Element Update are included in Appendix B.

The Public Safety Element is organized into two primary pieces: the Public Safety Element and the Technical Background Report. The Public Safety Element comprehensively addresses the public safety needs and concerns of its Riverside residents, businesses, institutions, and visitors in a proactive and coordinated way to ensure protection from foreseeable natural and human-caused hazards. The Background Technical Report supports the Public Safety Element.

## 2.2.4 Zoning Code Amendments

Proposed rezoning of the Opportunity Sites will allow for fulfilment of the City's RHNA obligation. The proposed Zoning Code and Specific Plan amendments include various multi-family and mixed-use land use categories, which would provide for development of some lower-story commercial/retail, office, and potentially live/work uses. Existing zoning is illustrated on Figure 2-6.

Areas proposed for rezoning are illustrated on Figure 2-7 and summarized in Table 2-1. For purposes of the CEQA analysis, the maximum development that could be allowed is analyzed in this EIR. The process for identifying Opportunity Sites is described in detail in Section 2.2.2.

**Table 2-1. Number of Acres to be Rezoned by Ward**

Ward	Acres to be Rezoned
1	46
2	85
3	86
4	29
5	55
6	76
7	82
<b>TOTAL</b>	<b>460</b>

Source: City of Riverside 2021.

The Project involves 239 acres that do not require zoning changes and 581 acres that would require general plan amendments, Zoning Code changes, and Specific Plan amendments, for a total of 870 parcels comprising 820 acres. Of the 581 acres, 460 acres would require Zone Code changes.

Not all Opportunity Sites identified in the preliminary inventory are currently zoned to allow for housing development. The next step in the process included development of scenarios to meet the City's RHNA obligation and refining the preliminary Opportunity Sites to develop a preferred alternative, or the 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 distributed equitably throughout the City.

The Opportunity Sites' existing onsite conditions indicate that approximately 759 acres (approximately 80 percent) of the Opportunity Sites are developed to varying degrees with residential and nonresidential land uses, while the remaining approximately 152 acres are undeveloped.<sup>3</sup> Approximately 166 DUs and approximately 13 million square feet of nonresidential land uses exist on the Opportunity Sites.

<sup>3</sup> The summary includes all sites being considered in the environmental review.

## 2.2.5 Specific Plan Amendments

In addition to the Zoning Code amendments, the Housing Element would require amendments to seven of the City's adopted Specific Plans. The following Specific Plans would require updates, including mapping and land use changes, to accommodate Opportunity Sites that have been identified within their boundaries. Figure 2-8 illustrates the Specific Plans subject to change.

The **Downtown Specific Plan (DSP)** consists of approximately 640 acres in the northern portion of the City and encompasses Downtown Riverside and its immediate surroundings. The DSP was created to facilitate and encourage development and improvements that help the community's vision of Downtown. Figure 2-9 illustrates the land use districts in the DSP. Amendments for the DSP include boundary changes as well as increased densities to accommodate housing. Figures 2-10 and 2-11 illustrate the changes proposed for the DSP.

The **Magnolia Avenue Specific Plan**, developed in 1999 as part of the Magnolia/Market Corridor Study, focuses on the portion of Magnolia Avenue from the western City limits to the northern side of Riverside Community College at the southern boundary of Downtown, for an area totaling approximately 1,588 acres. The plan area consists of the following six Specific Plan districts:

- La Sierra (Buchanan Street to just east of Banbury Drive)
- Galleria (just east of Banbury Drive to Harrison Street)
- Arlington (Harrison Street to Jackson Street)
- Magnolia Heritage (Jackson Street to Arlington Avenue)
- Magnolia Center (Arlington Avenue to Jurupa Avenue)
- Wood Streets (Jurupa Avenue to north side of Riverside Community College)

Proposed amendments would be to Table 2.1, *General Plan Land Use Designation by Acreage*, of Chapter 2, *Context*; Chapter 3, *Vision, Objectives, Goals and Policies*; Figures 3.1, 3.3, 3.5, 3.7, and 3.9 and Tables 3.1, 3.2, 3.3, and 3.4; and Chapter 4, *Land Use Regulations, Development Standards and Design Guidelines*, to incorporate additional multi-family and mixed-use development on Housing Element Opportunity Sites throughout the Specific Plan, and to make other non-substantive technical and clarifying changes as necessary.

The **University Avenue Specific Plan** totals approximately 179 acres and is located on University Avenue, a main thoroughfare connecting the University of California, Riverside, campus and Riverside's historic Downtown. The Specific Plan promotes the long-term viability and rejuvenation of the University Avenue corridor, establishes and maintains a viable mix of land uses, encourages high-quality development, accommodates pedestrian activity, maintains visual continuity, and recognizes the interdependence of land values and aesthetics. Proposed amendments include Table 2, *Land Uses Permitted in Each Subdistrict*, and Table 3, *Additional Use Regulations*, of Chapter 6, *Land Use Regulations*, to accommodate multi-family and mixed-use development on Housing Element Opportunity Sites throughout the Specific Plan and to make other non-substantive technical and clarifying changes as necessary.

The **Riverside Marketplace Specific Plan** totals approximately 200 acres. It establishes standards and guidelines for development within the plan area with the purpose of creating incentive to:

- Redevelop the Riverside Marketplace area

Figure 2-6  
Existing Zoning

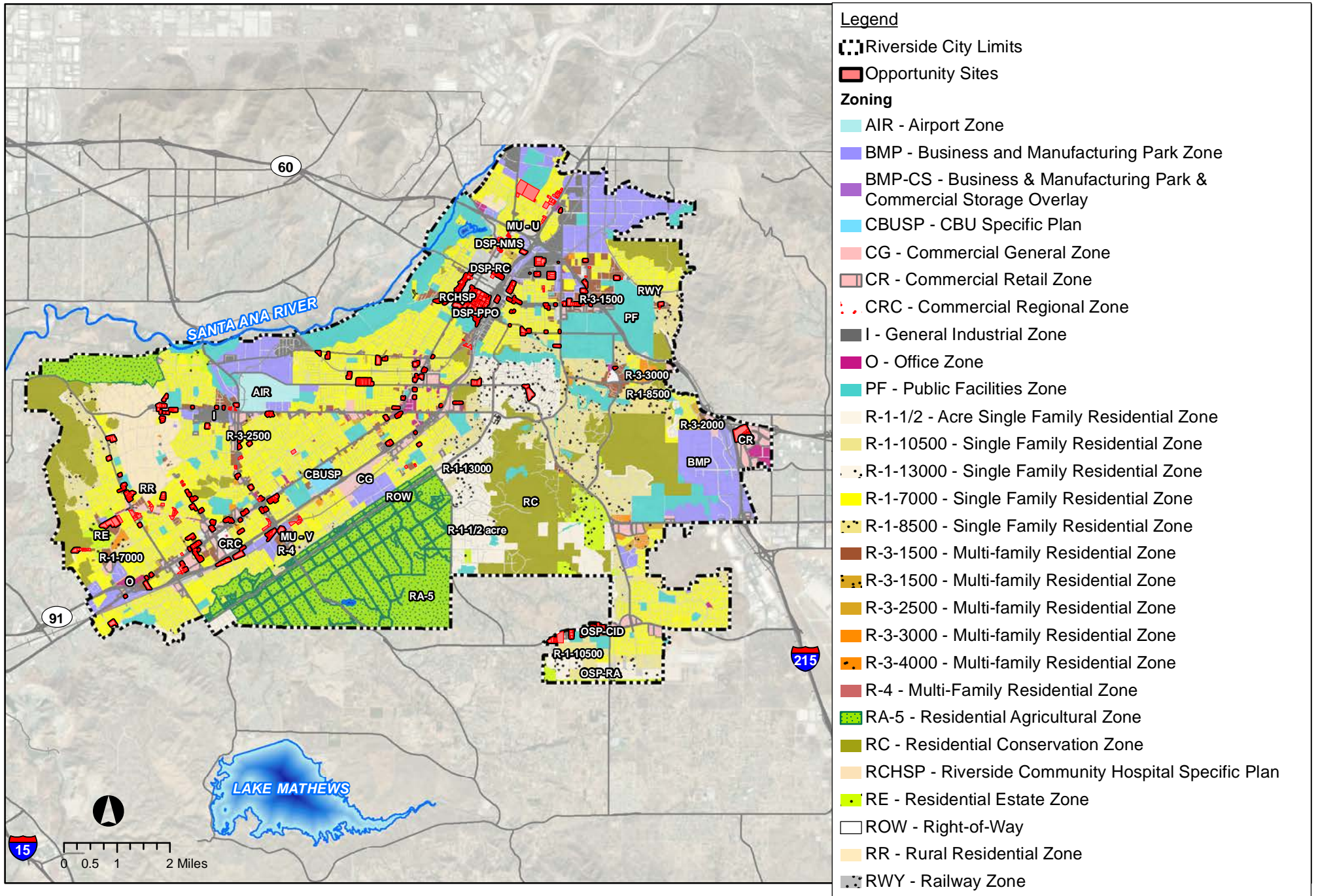




Figure 2-7  
Proposed Zoning

