CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT **PLANNING DIVISION**

DRAFT MITIGATED NEGATIVE DECLARATION

WARD: 1

1. **Case Number:** P17-0761 (SPA), P17-0762 (CUP), P17-0763 (TM) , P17-0764 (COA)

2. **Project Title:** 4019 Mission Inn Avenue Townhomes

3. **Meeting Date:** Cultural Historical Board – June 20, 2018
4. **Hearing Date:** Planning Commission – June 28, 2018

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

6. **Contact Person:** Judy Egüez, Associate Planner
Phone Number: (951) 826-3969

7. **Project Location:** 4019 Mission Inn Avenue, situated on the northwest corner of Mission Inn Avenue and Chestnut Street. – APN 214-211-007

8. **Project Applicant/Project Sponsor's Name and Address:**

CityMark
Mr. Russ Haley
CityMark Communities, LLC
3818 Park Boulevard
San Diego, CA 92103

9. **General Plan Designation:** Downtown Specific Plan

10. **Zoning:** Downtown Specific Plan-Neighborhood Commercial District and Cultural Resources Overlay Zone (DSP-NC-SP-CR)

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

The project proposes to subdivide the subject 0.64 acre site into a single condominium parcel for the construction of 13 condominium units. The project site is vacant and generally covered in gravel. Ruderal vegetation is sparsely located around perimeter. There are existing access driveways located along both Chestnut Street and Mission Inn Avenue. As proposed, the development will consist of seven (7) two-story townhouse buildings containing a total 13 units. Six of the seven buildings would have two units ranging from 1,771 to 1,929 square feet with 2-car garages and private courtyards. The building located at the northeast corner of the site would have one 1,929 square foot unit. Landscaping would be provided throughout the project common areas. The project would be accessible by vehicle from Chestnut Street with pedestrian access provided via Mission Inn Avenue and Chestnut Street. Each

unit will have private usable open space ranging from 187 square feet up to 795 square feet, consisting of a covered porch and an enclosed patio or yard. Approximately 26% of common usable open space is provided for use by all project residents in the form of a centrally located landscaped courtyard that also runs along the fronts of all buildings. This project is not proposed to be gated. Construction is expected to begin in late 2018 and be completed in mid-2019.

To facilitate this development, the applicant is proposing the following:

- An amendment to the Downtown Specific Plan to allow the proposed multi-family residential development in the Neighborhood Commercial District subject to the granting of a Conditional Use Permit.
- A Conditional Use Permit to allow the proposed residential use; and
- A Certificate of Appropriateness for the construction of the proposed project.

With approval of the Specific Plan Amendment the project would be consistent with applicable land use plans and policies.

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

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant	Downtown Specific Plan	DSP-NC-SP-CR - Downtown Specific Plan-Neighborhood Commercial District and Cultural Resources Overlay Zone
North	Residential	Downtown Specific Plan	DSP-RES-SP - Downtown Specific Plan-Residential District Overlay Zone
East	Commercial/Residential	Downtown Specific Plan	DSP-RC-SP-CR - Downtown Specific Plan-Raincross District and Cultural Resources Overlay Zone
South	Commercial	Downtown Specific Plan	DSP-NC-SP-CR - Downtown Specific Plan-Neighborhood Commercial District and Cultural Resources Overlay Zone
West	Commercial/Residential	Downtown Specific Plan	DSP-NC-SP-CR - Downtown Specific Plan-Neighborhood Commercial District and Cultural Resources Overlay Zone

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

    a. None known

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

    a. City of Riverside Downtown Specific Plan, amended May 2017.
    b. City of Riverside General Plan 2025, November 2007.
    c. City of Riverside General Plan 2025 Final Program Environmental Impact Report (EIR), November 2007.
    d. Cultural Resource Report and Historic Compatibility Assessment for the 4019 Mission Inn Avenue Project, Brian F. Smith and Associates, Inc., November 16, 2017.
    e. Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, NOVA Services, Inc., December 26, 2017.
    f. Phase I Environmental Site Assessment, Mission Inn Avenue Townhomes, SCS Engineers, Inc., April 2017.
    g. Limited Phase II Environmental Site Assessment, Mission Inn Avenue Townhomes, SCS Engineers, Inc., August 2017.

15. **Acronyms**

AQMP -	Air Quality Management Plan
BMP –	Best Management Practice
CalEEMod -	California Emission Estimator Model
CIWMA -	California Integrated Waste Management Act
CBC -	California Building Code
CDW -	Construction/Demolition Waste
CEQA -	California Environmental Quality Act
CNEL-	Community Noise Equivalent Level
CNP -	California Native Plant Society
CMP -	Congestion Management Plan
CO -	Carbon Monoxide
CO_2 -	Carbon Dioxide
DMA -	Drainage Management Area
EIR -	Environmental Impact Report
dB -	Decibels
dBA -	A-weighted decibel
DTSC –	Department of Toxic and Substance Control
ECR –	Estimated Cancer Risk
FEMA -	Federal Emergency Management Agency
FPEIR -	GP 2025 Final Programmatic Environmental Impact Report
GHG -	Greenhouse Gas
GP 2025 -	General Plan 2025
IS -	Initial Study
LOS -	Level of Service
LST-	Local Significance Thresholds
MSHCP -	Multiple-Species Habitat Conservation Plan
NAHC -	Native American Heritage Commission
NCCP -	Natural Communities Conservation Plan
NPC –	Neighborhood Policing Centers
NOx -	Nitrogen Oxide
NO_2 -	Nitrogen Dioxide
MGD -	Million Gallons Day

MRZ – Mineral Resource Zone
MWD - Metropolitan Water District
PEIR - Program Environmental Impact Report
PM10 - Particulate Matter 10
PM2.5 - Particulate Matter 2.5
RWQCP - Regional Water Quality Control Plant
ROG - Reactive Organic Gas
RPU - Riverside Public Utilities
RTP – Regional Transportation Plan
RUSD - Riverside Unified School District
SLF - Sacred Lands File
SOI - Secretary of Interior
SRA – Source Receptor Area
SCAG - Southern California Association of Governments
SCAQMD - South Coast Air Quality Management District
USACE - US Army Corps of Engineers
VdB - Vibration Decibels
VOC – Volatile Organic Compounds
VMT - Vehicle Miles Traveled
WQMP - Water Quality Management Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

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

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

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

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

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

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

Signature _____ Date _____

Printed Name & Title Judy Egüez, Associate Planner For City of Riverside

CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT **PLANNING DIVISION**

ENVIRONMENTAL INITIAL STUDY

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a. **Earlier Analysis Used.** Identify and state where they are available for review.

   b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c. **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

a. the significance criteria or threshold, if any, used to evaluate each question; and

b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

1a. Response: ***Source: General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways, Downtown Specific Plan Chapter 14, California Department of Transportation. Officially Designated State Scenic Highways, website visited January 1, 2018)***

Less than significant. The City of Riverside General Plan 2025 provides planning and policy guidance for development within the City. No specific visual features are noted in the General Plan that pertain to the general project area nor does it include policy guidance referencing the protection or preservation of visual resources in the project area.

Implementation of the project would occur on a vacant undeveloped site. The site is located within an urban area in the Downtown Specific Plan which is currently developed with a mixture of commercial and residential uses. Mission Inn Avenue is the primary road corridor located in proximity to the site. It is a four-lane street with trees located along both sides. The site is visible from Mission Inn Avenue and Chestnut Street. Views into the site are of undeveloped gravel with some ruderal vegetation. Views within the area are not designated scenic nor does the site contain any unique visual features.

The site is located within the Downtown Specific Plan Neighborhood Commercial District. The project would be designed to conform to the Downtown Specific Plan design standards provided in Chapter 14.6 which are intended to facilitate the development of a uniform appearance within downtown Riverside. These standards include building architecture, setbacks, height, bulk/mass, lot layout, access/parking and related factors. Thus, while views of the site would change, no designated scenic views or resources would be affected. All improvements would conform to the applicable design standards. Thus, impacts to scenic vistas would be **less than significant. No mitigation is required.**

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

1b. Response: ***(Source: California Department of Transportation. Officially Designated State Scenic Highways, website visited January 1, 2018)***

No impact. There are no scenic highways within the City that could potentially be impacted. As noted, the site is undeveloped. The site is not located in proximity to a scenic highway. The site is located within a historic district (see response 5a). There are no trees, historic structures or other visually prominent features on the site. **No impact** to these resources would occur as a result of project implementation. **No mitigation is required**.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐

1c. Response: ***(Cultural Resource Report and Historical Compatibility Assessment for the 4019 Mission Inn Avenue Project, November 2017, Citywide Residential Historic District Design Guidelines, 2003)***

Less than Significant. The project is located within the Seventh Street Historic District (Landmark #40). The Seventh Street Historic District was established in August 1980, and runs the length of Mission Inn Avenue, generally encompassing both sides of the street. The district is bound by Mt. Rubidoux Drive on the northwest and Santa Fe Avenue on the southeast. The district includes a range of architectural styles. Furthermore, the Seventh Street Historic District is surrounded by other City historic districts, including the Mile Square Northwest Historic District to the north, the Mission Inn Historic District to the east, the Evergreen Historic District to the south/southwest, and the Mount Rubidoux and Colony Heights Historic Districts to the west/north west.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

The project site and proposed project was evaluated for consistency with the historic district designation in the *Cultural Resource Report and Historical Compatibility Assessment for the 4019 Mission Inn Avenue Project* (November 17, 2017). Section 5.0 of the technical report provides an evaluation of potential impacts to historic resources per Federal Standards for Rehabilitation (US Department of Interior 2017) and City of Riverside guidelines for determining the criteria for designation and appropriate additions to an historic district. Criteria for interpreting infill compatibility within historic districts are well-defined within the Riverside Design Guidelines for Infill Construction in Historic Districts, which reference and support the US Secretary of the Interior standards.

As referenced, the site is vacant; however, it was originally used for residential purposes which then transitioned to commercial uses. The majority of the neighboring properties were also originally developed with single- and multifamily residences. As a multifamily residential infill project, the proposed project would be consistent with the original uses and neighboring uses that comprise a portion of the Seventh Avenue Historic District.

The new construction is oriented on the block with acceptable setbacks to differentiate it from the surrounding historic properties. The size and scale of the proposed project is compatible with neighboring structures, and the placement of the townhomes was inspired by the bungalow court property which abuts the project site to the west. The rectangular footprint and rectangular horizontal massing are also compatible with the general design of neighboring Spanish and Mission Revival and Mid-Century modern buildings. Two historic Raincross streetlights are located along the sidewalk fronting the site. These streetlights are not original and can be relocated rather than protected in place.

While the proposed project will change the existing visual environment, design of the project has considered the historic context of the site and surrounding properties and incorporated design elements to ensure compatibility with the historic designation. Aesthetic impacts would be less than significant. No mitigation is required.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

1d. Response: ***(Source: Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines)***

Less than Significant. The project would add new residential buildings and exterior lighting which would be visible from adjacent streets and vehicles operating on the streets. Temporary outdoor lighting may be visible during operation of construction equipment; however, construction is expected to occur primarily during daylight hours. All outdoor street lighting would be designed to City of Riverside standards contained in Chapter 19.556 of the Municipal Code regarding outdoor lighting requirements. As a condition of approval, submittal of an exterior lighting plan will be required for Design Review staff review and approval. This plan should include a photometric study and manufacturer's cut sheets of all exterior lighting on the buildings, in landscaped areas and in parking areas.

All on-site lighting must provide a minimum intensity of one foot-candle and a maximum intensity of ten foot-candles at ground level throughout the areas serving the public and used for parking, with a ratio of average light to minimum light of four to one (4:1). Per the guidelines light sources must be shielded to minimize off-site glare, must not direct light skyward and must be directed away from adjacent properties and public rights-of-ways. If lights are proposed to be mounted on buildings, down-lights should be utilized. Light poles should not exceed fourteen (14) feet in height including the height of any concrete or other base material when within 50 feet of residences per Section 19.590.070 B of the Riverside Municipal Code. As referenced above, the existing Raincross streetlights fronting the site would be maintained. With approval of the exterior lighting plan, impacts related to light and glare would be **less than significant. No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES:				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information complied by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

2a. Response: ***(Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability & General Plan 2025 FPEIR, Site Visit, December 20, 2017)***

No Impact. The Project site is a vacant, disturbed parcel located within an urbanized area. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 shows the project site is not designated as, and is not adjacent to or in proximity to any land classified as, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the project will have **no impact** directly, indirectly or cumulatively to agricultural uses. **No mitigation is required.**

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

2b. Response: ***(Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-2)***

No Impact. A review of Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR indicates the project site is not located within an area affected by a Williamson Act Preserve or under a Williamson Act Contract. Moreover, the project site is not zoned for agricultural use and is not next to land zoned for agricultural use; therefore, the project will have **no impact** directly, indirectly or cumulatively on agricultural resources. **No mitigation is required.**

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

2c. Response: ***(Source: Downtown Specific Plan, City of Riverside Zoning Code)***

No Impact. The site is not zoned forest land nor would the project rezone forest land. Therefore, **no impacts** will occur from this project directly, indirectly or cumulatively. **No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

2d. Response: (Source: *Downtown Specific Plan, City of Riverside Zoning Code)*

No Impact. The City of Riverside has no forest land that can support 10-percent native tree cover nor does it have any timberland; therefore, **no impacts** will occur from this project directly, indirectly or cumulatively. **No mitigation is required.**

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

2e. Response: (Source: *Downtown Specific Plan, City of Riverside Zoning Code)*

No Impact. The project is located in an urbanized area of the City in an existing developed area. Additionally, the site is identified as urban/built out land; and therefore, does not support agricultural resources or operations. The project will not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands within proximity of the subject site. Therefore, **no impacts** will occur from this project directly, indirectly or cumulatively to conversion of farmland, to non-agricultural use or to the loss of forest land. **No mitigation is required.**

3. AIR QUALITY.				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

3a. Response: ***(Source: South Coast Air Quality Management District's 2016 Air Quality Management Plan (AQMP))***

Less Than Significant Impact. Projects that are consistent with the projections of employment and population forecasts identified by the Southern California Association of Governments (SCAG) are considered consistent with the AQMP growth projections, since these forecast numbers were used by SCAG's modeling section to forecast travel demand and air quality for planning activities such as the Regional Transportation Plan (RTP), the SCAQMD's AQMP, Regional Transportation Improvement Program (TRIP), and the Regional Housing Plan. This project is consistent with the projections of employment and population forecasts identified by the Southern California Association of Governments (SCAG) that are consistent with the General Plan 2025 "Typical Growth Scenario." Since the project is consistent with the General Plan 2025, it is also consistent with the AQMP. The project will have a **less than significant impact** directly, indirectly and cumulatively on the implementation of an air quality plan. **No mitigation is required.**

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐

3b. Response: ***(Air Quality Analysis prepared by Birdseye Planning Group, 2018, using CalEEMod 2016.3.2; City of Riverside Traffic Impact Analysis Guide, December 2017)***

Project construction would generate temporary air pollutant emissions. Both construction emissions and vehicle emissions associated with operation of the facility are quantified herein.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Construction Emissions

Construction vehicles and equipment operating on the graded site as well as grading/site preparation activities have the potential to generate fugitive dust (PM_{10} and $PM_{2.5}$) through the exposure of soil to wind erosion and dust entrainment. Project related construction activities would also emit ozone precursors (oxides of nitrogen (NO_X), reactive organic gases (ROG)) as well as carbon monoxide (CO). The majority of construction-related emissions would result from site preparation and the use of heavy duty construction equipment. However, emissions would also be associated with constructing the residences and paving surface streets.

The project would be required to comply with SCAQMD Rule 403, which identifies measures to reduce fugitive dust and is required to be implemented at all construction sites located within the South Coast Air Basin. Rule 403 (2) was included in CalEEMod for site preparation and grading phases of construction. Specifically, modeling assumed the site would be watered three times daily.

1. **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.

2. **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least three times daily, preferably in the late morning and after work is done for the day.

3. **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be applied to portions of the construction site that are inactive for over four days.

4. **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).

5. **Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Construction emission modeling for site preparation, grading, building construction, paving, and architectural coating application is based on the overall scope of the proposed development and construction phasing which is expected to begin mid-2018 and extend through mid-2019. It is assumed for modeling purpose that the entire 0.6-acre development area would be disturbed during construction. For dust control, it was assumed the maximum area would be watered three times daily. In addition to SCAQMD Rule 403 requirements referenced above, emissions modeling also accounts for the use of low-VOC paint (50 g/L for nonflat coatings) as required by SCAQMD Rule 1113. Table 2 summarizes the estimated maximum mitigated daily emissions of pollutants occurring during 2018 and 2019.

Table 2
Estimated Maximum Daily Construction Emissions

Construction Phase	Maximum Emissions (lbs/day)					
	ROG	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
2018 Maximum lbs/day	1.1	11.1	8.2	0.01	1.0	0.7
2019 Maximum lbs/day	32.9	9.9	7.9	0.01	0.7	0.5

ISSUES (AND SUPPORTING INFORMATION SOURCES):			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded 2018	**No**	**No**	**No**	**No**	**No**	**No**
Threshold Exceeded 2019	**No**	**No**	**No**	**No**	**No**	**No**

As shown in Table 2, construction of the proposed project would not exceed the SCAQMD regional thresholds during either 2018 or 2019.

Localized Significance Thresholds (LSTs). The SCAQMD has published a "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" (South Coast Air Quality Management District, 2011). CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. Construction-related emissions reported by CalEEMod are compared to the localized significance threshold lookup tables.

LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size and distance to the sensitive receptor. However, LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction and operation. LSTs have been developed for NO_X, CO, PM_{10} and $PM_{2.5}$. LSTs are not applicable to mobile sources such as cars on a roadway (Final Localized Significance Threshold Methodology, SCAQMD, June 2003). As such, LSTs for operational emissions do not apply to the proposed development as the majority of emissions would be generated by vehicles operating on roadways.

LSTs have been developed for emissions within areas up to five acres in size, with air pollutant modeling recommended for activity within larger areas. The SCAQMD provides lookup tables for project sites that measure one, two, or five acres. It is assumed for this analysis that the entire 0.6-acre site would be disturbed on any given day during construction; thus, the look up table values for a one acre site were used to provide a conservative evaluation of potential impacts. The project site is located in Source Receptor Area 23 (SRA-23, Metropolitan Riverside County). LSTs for construction related emissions in the SRA 23 at varying distances between the source and receiving property are shown in Table 3.

Table 3
SCAQMD LSTs for Construction

Pollutant	**Allowable emissions as a function of receptor distance in meters from a two-acre site (lbs/day)**				
	25	**50**	**100**	**200**	**500**
Gradual conversion of NO_x to NO_2	118	148	212	3335	652
CO	602	887	1,744	4,359	17,640
PM_{10}	4	12	30	67	178
$PM_{2.5}$	1	3	8	17	43

Source: http://www.aqmd.gov/CEQA/handbook/LST/appC.pdf, October 2009.

As referenced, the nearest sensitive receptors to the project site are residences immediately adjacent to the site to the west and north. Thus, the 25-meter values shown in Table 3 are used to determine project consistency with the LSTs. As discussed, LSTs apply only to on-site activities and do not include off-site vehicle trips and associated emissions. As shown in Table 4, the LST values would not be exceeded at the nearest receiver located north of the site. No mitigation is required.

Table 4
Estimated Maximum Daily On-Site Construction Emissions and LSTs

On-Site Construction Emissions	**NOx**	**CO**	**PM_{10}**	**$PM_{2.5}$**
- Site Preparation	9.7	4.2	0.6	0.4
- Grading	9.4	7.7	0.9	0.7
- Building Construction (2018)	11.0	7.7	0.7	0.6
- Building Construction (2019)	9.8	7.5	0.6	0.5
- Paving	7.8	7.1	0.4	0.4
- Architectural Coating	1.8	1.8	.12	.12
Local Significance Threshold – 25 meters (on-site only)[3]	**118**	**602**	**4**	**1**
Threshold Exceeded	No	No	No	No

Notes: All calculations were made using CalEEMod 2016.3.2. See Appendix B. Grading, Paving, Building Construction, and Architectural Coating totals include worker trips, construction vehicle emissions and fugitive dust.
Site Preparation and Grading phases incorporate anticipated emissions reductions required by SCAQMD Rule 403 to reduce fugitive dust. Architectural coating phase assumes low VOC paint would be used per SCAQMD Rule 1113.
[2] LSTs are for a 1-acre disturbance area in SRA-23 within 25 meters of sensitive property boundary.

Compliance with SCAQMD regulations as referenced above would be required. Construction impacts would not cause an adverse air quality impact per thresholds (b) and (d) referenced above.

Operation Emissions

Table 5 summarizes emissions associated with operation of the proposed project. Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), and area sources including landscape equipment and architectural coating emissions as the structures are repainted over the life of the project. Emission calculations include the implementation of water saving fixtures and related requirements associated with Title 24 of the California Energy Code. These features are options in CalEEMod and are intended to demonstrate regulatory compliance. They do not in all cases, reflect project specific mitigation requirements. The majority of operational emissions are associated with vehicle trips to and from the project site. Trip volumes were based on trip generation factors for residential projects incorporated into CalEEMod. As shown in Table 5, the net change in emissions would not exceed the SCAQMD thresholds.

Table 5
Estimated Operational Emissions

	Estimated Emissions (lbs/day)					
	ROG	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project						
Area	0.5	0.01	1.0	0.01	0.01	0.01
Energy	0.01	0.07	0.03	0.01	0.01	0.01

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Mobile	0.01	0.9	1.3	0.01	0.3	0.9
Maximum lbs/day	**.7**	**1.04**	**2.4**	**0.03**	**0.32**	**0.10**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

See Appendix B for CalEEMod version. 2016.3.2 computer model output for operational emissions. Summer emissions shown.
Note – totals may vary slightly due to rounding.

Therefore, the project's regional air quality impacts (including impacts related to criteria pollutants, sensitive receptors and violations of air quality standards) would be **less than significant. No mitigation is required.**

To ensure that the State and Federal ambient air quality standards for CO are not violated, the SCAQMD recommends that projects with a potential to generate heavy volumes of traffic, and which can lead to high levels of CO, use hot spot modeling to determine the potential to create a CO "Hot Spot". A CO "Hot Spot" is a localized concentration of CO that is above the State or Federal 1-hour or 8-hour ambient air standards. A localized high CO level is associated with traffic congestion and idling or slow-moving vehicles and requires additional analysis beyond total project emissions quantification. Per the City or Riverside Traffic Impact Analysis Guide (December 2017), the proposed project does not have the potential to generate heavy traffic volumes; thus, a traffic study was warranted. Since a traffic study was not required, the project is not expected to adversely affect traffic operations to the extent that CO hotspots could be generated. Air quality impacts associated with operation of the proposed project would be **less than significant impact**. **No mitigation is required.**

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐

3c. Response: ***(Source: Air Quality Analysis prepared by Birdseye Planning Group, 2018, using CalEEMod 2016.3.2)***

Less Than Significant Impact. As referenced, construction and operation of the proposed project would not exceed SCAQMD emission thresholds for any criteria pollutants. Thus, the project would not result in any new significant air quality impacts. Therefore, cumulative air quality emissions impacts are **less than significant**. **No mitigation is required.**

d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

3d. Response: ***(Source: Air Quality Analysis prepared by Birdseye Planning Group, 2018, using CalEEMod 2016.3.2)***

Less Than Significant Impact. Short-term impacts associated with construction from General Plan 2025 typical build out will result in increased air emissions from grading, earthmoving, and construction activities as referenced above and described for Response 3b. No mitigation would be required to reduce emissions to less than significant. Therefore, the project will not expose sensitive receptors located adjacent to and north, east and west of the site to substantial pollutant concentrations. A **less than significant impact** will occur directly, indirectly or cumulatively for this project. **No mitigation is required.**

e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

3e. Response: ***(Source: Air Quality Analysis prepared by Birdseye Planning Group, 2018, using CalEEMod 2016.3.2***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Less Than Significant Impact. While exact quantification of objectionable odors cannot be determined due to the subjective nature of what is considered "objectionable," the nature of the proposed project present a potential for the generation of objectionable odors associated with construction activities. While residential projects are not typically associated with the generation of objectionable odors, the construction activities associated with the expected build out of the project site will generate airborne odors like diesel exhaust emissions and architectural coatings. However, emissions would occur only during daylight hours, be short-term in duration, and would be isolated to the immediate vicinity of the construction site. Therefore, they would not expose a substantial number of people to objectionable odors on a permanent basis. Therefore, the project will not cause objectionable odors affecting a substantial number of people and a **less than significant impact** directly, indirectly and cumulatively will occur. **No mitigation is required.**				
4. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
4a. Response: ***(Source: General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas)***				
No Impact. The project site is located on a previously developed/improved site within an urbanized area. A search of the MSHCP database and other appropriate databases identified no potential for candidate, sensitive or special status species, suitable habitat for such species on site. Therefore, the project will have **no impact** directly, indirectly and cumulatively on habitat modifications, species identified as a candidate, sensitive, or special status species in local or regional plans, and policies or regulations of the California Department of Fish and Game or U.S. Fish and Wildlife Service. **No mitigation is required.**				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
4b. Response: ***(Source: General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas)***				
No Impact. The project is located on a previously developed/improved site within an urbanized area where no wetland or riparian vegetation exists on the site or within proximity to the project site. Therefore, **no impact** to 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 Game or U.S. Fish and Wildlife Service with implementation of the proposed project will occur directly, indirectly and cumulatively. **No mitigation is required.**				
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
4c. Response: ***(Source: Site Visit, December 2017)***				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
No Impact. The project is located within an urbanized area. No federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) exist on or in proximity to the project site. The project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils; and thus, does not include USACOE jurisdictional drainages or wetlands. Therefore, the proposed project would have **no impact** to federally protected wetlands as defined by Section 404 of the Clean Water Act directly, indirectly and cumulatively. **No mitigation is required.**				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
4d. Response: ***(Source: Site Visit, December 2017)***				
No Impact. The project is within an urbanized area and will not result in a barrier to 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. Therefore, the project will have **no impact** to wildlife movement directly, indirectly and cumulatively. **No mitigation is required.**				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
4e. Response: ***(Source: General Plan Update 2025 and General Plan Update 20205 FPEIR)***				
No Impact. The project proposes the construction of 13 new condominium units on a vacant site. The site is within an urbanized area of downtown Riverside and is subject to the MSHCP mitigation fees. In addition, the General Plan 2025 includes policies to ensure that future development would not conflict with any local policies or ordinances protecting biological resources, including tree preservation policies. No trees existing on-site and existing street trees fronting the site would not be affected by the project. For these reasons, the project will have **no impact** directly, indirectly and cumulatively with local policies or ordinances protecting biological resources. **No mitigation is required.**				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
4f. Response: ***(Source: General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas)***				
No Impact. The project site is located on a previously developed/improved site within an urbanized area and will not impact an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan directly, indirectly and cumulatively. Therefore, the project will have **no impact** on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. **No mitigation is required.**				
5. CULTURAL RESOURCES. Would the project:				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA Guidelines?	☐	☐	☒	☐

5a. Response: ***(Source: Cultural Resource Report and Historical Compatibility Assessment for the 4019 Mission Inn Avenue Project, November 2017)***

Less than Significant Impact. The project is located on a site where no historic resources exist as defined in Section 15064.5 of the CEQA Guidelines. As referenced, the site is undeveloped but has been developed with both residential and commercial buildings. The Cultural Resources Report and Historic Compatibility Assessment recommends that the proposed Project design be considered as an acceptable urban infill development in compliance with the City of Riverside Design Guidelines for Infill Construction in Historic Districts and the Secretary of Interior's (SOI) Standards for Rehabilitation. It was determined that the massing, scale, orientation, and layout mediates between the commercial, single-family residential, and multi-family residential structures within the immediate vicinity of the project. Further, the project is designed such that the size, scale, proportion, color, and materials of the new buildings are compatible with the existing neighborhood, and the contemporary design with the use of modern technology and materials is achieved in a manner sensitive to the surrounding historic structures.

While the project would be constructed within the Seventh Avenue Historic District, the site is currently vacant and undeveloped. Thus, the project would not directly, indirectly and cumulatively impact a historical resource. Further, the project has been designed consistent with applicable standards and guidelines addressing infill projects constructed within historic districts. Thus, while the project would be a new development, it would not adversely impact a historic resource or district. Impacts would be **less than significant** under this threshold. **No mitigation is required.**

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☐	☐	☒

5b. Response: ***(Source: Cultural Resource Report and Historical Compatibility Assessment for the 4019 Mission Inn Avenue Project, November 2017)***

Less Than Significant Impact. A site survey for archeological resources was prepared by Brian F. Smith and Associates, September 2017. The survey meets the Secretary of the Interior Standards and Guidelines and based on the results, the City of Riverside has determined there are no known archeological resources present on the site. No impact to archeological resources directly, indirectly and cumulatively would occur as a result of the project. **No mitigation is required.**

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

5c. Response: ***(Source: General Plan 2025 Policy HP-1.3; Cultural Resource Report and Historical Compatibility Assessment for the 4019 Mission Inn Avenue Project, November 2017)***

No impact. The project is located on a previously developed/improved site within an urbanized area where no activities, such as new development involving grading/ground disturbance, are proposed that would create a potential for additional disturbance of paleontological resources or a site containing unique geologic features. Policy HP-1.3 within General Plan 2025 states the City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process. The Cultural Resources Report and Historic Compatibility Assessment prepared for the project did not identify any known paleontological resources occurring on the site or find that the site is sensitive for the presence of paleontological resources. Therefore, the project will have **no impact** directly or indirectly on a unique paleontological resource or site or unique geologic feature. **No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

5d. Response: ***(Source: Cultural Resource Report and Historical Compatibility Assessment for the 4019 Mission Inn Avenue Project, November 2017)***

Less than Significant. The project is located on a previously developed/improved site within an urbanized area where no activities, such as new development involving grading/ground disturbance, are proposed that would create potential for disturbance of human remains. Therefore, the project is not expected to directly, indirectly or cumulatively impact human remains, including those interred outside of formal cemeteries. Standard Conditions of Approval will be included in the project findings to address the unforeseen discovery of human remains. Impacts would be **less than significant**. **No mitigation is required.**

6. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

6i. Response: ***(Source: General Plan Update 2025 FPEIR Appendix E; Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

Less than Significant. The City of Riverside is surrounded by three major earthquake faults: San Andreas, San Jacinto and Elsinore faults. At its closest point, the San Andreas fault is 11 miles from downtown Riverside, running through the San Bernardino mountains. The fault has the capability of producing up to an 8.3 magnitude earthquake. The San Jacinto fault extends more than 125 miles, from northwest of El Centro to northwest of San Bernardino. This fault "passes through" the intersection of Interstate Highways 10 and 215, Loma Linda, the Box Springs Mountains across Highway 60 to the northern end of the San Jacinto Valley. This fault has the capability of producing up to a 7.0 magnitude earthquake. At its closest point, this fault is seven miles from downtown Riverside. The Elsinore fault is located southwest of Lake Matthews, running through Corona and south into Lake Elsinore. It is connected to the Whittier fault near Santa Ana River in the Corona/Riverside area. This fault has the capability of producing up to a 6.0 magnitude earthquake. At its closest point, this fault is 13 miles from downtown Riverside.

The project site is not located within the boundaries of an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act of 1972 or a Riverside County Fault Hazard Zone for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. There are no known active or potentially active faults traversing the area and the risk of ground rupture resulting from fault displacement beneath the site is low.

During the life of the proposed improvements, the property will likely experience moderate to occasionally high ground shaking from known faults, as well as background shaking from other seismically active areas of the Southern California region. However, site preparation and construction of building foundations consistent with the geotechnical report and current California Building Code (CBC) requirements would address seismic concerns and related structural impacts associated with ground shaking. Impacts would be **less than significant. No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	☐	☐	☒	☐

6ii. Response: ***(Source: General Plan 2025 FPEIR Appendix E, Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

Less than Significant. The San Jacinto Fault Zone located in the northeastern portion of the City, or the Elsinore Fault Zone, located in the southern portion of the City, have the potential to cause moderate to large earthquakes that would cause intense ground shaking. As referenced, the proposed project would be designed consistent with California Building Code regulations; thus, impacts associated with strong seismic ground shaking will have a **less than significant** impact directly, indirectly and cumulatively. **No mitigation is required.**

iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒

6iii. Response: ***(Source: General Plan 2025 Figure PS-2 – Liquefaction Zones; Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

No Impact. The project site is located in an area with low potential for liquefaction as depicted in the General Plan 2025 Liquefaction Zones Map – Figure PS-2. Compliance with the California Building Code regulations and recommendations in the Geotechnical Report will ensure that impacts related to seismic-related ground failure, including liquefaction would have **no impact** directly, indirectly and cumulatively. **No mitigation is required.**

iv. Landslides?	☐	☐	☐	☒

6iv. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

No Impact. The project site and its surroundings have generally flat topography and are not located in an area prone to landslides per Figure 5.6-1 of the General Plan 2025 Program Final PEIR. Therefore, there will be **no impact** related to landslides directly, indirectly and cumulatively. **No mitigation is required.**

b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

6b. Response: ***(Source: Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

Less Than Significant Impact. Erosion and loss of topsoil could occur as a result of the project. State and Federal requirements call for the preparation and implementation of a Storm Water Quality Management Plan that would establish erosion and sediment controls for construction activities. The project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. In addition, with the erosion control standards for which all development activity must comply (Title 18), the Grading Code (Title 17) also requires the implementation of measures designed to minimize soil erosion. Compliance with State and Federal requirements as well as with Titles 18 and 17 will ensure that soil erosion or loss of topsoil will be **less than significant impact** directly, indirectly and cumulatively. **No mitigation is required.**

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6c. Response: ***(Source: General Plan 2025 PS-3 – Soils with High Shrink-Swell Potential; Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)*** **No Impact.** The project site is generally flat, and on-site soils have low to moderate shrink-swell potential per the GP 2025 Figure PS-3 and Table 5.6B of the FPEIR. As described previously in this section, the project site is not considered susceptible to landslides or liquefaction, and the site is not located on an existing fault. Implementation of the project would not cause the project site to become unstable. Therefore, the project would have **no impact** on landslides, lateral spreading, subsidence, liquefaction or collapse. **No mitigation is required.**				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
6d. Response: ***(Source: Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc., and California Building Code as adopted by the City of Riverside in Title 16 of the Riverside Municipal Code)*** **Less Than Significant Impact.** Expansive soil is defined under *California Building Code*. The preliminary soils report prepared for this project indicates that the soil has a low to very low expansion potential. Compliance with geotechnical/soils report recommendation and applicable provisions of the City's Subdivision Code (Title 18) and the California Building Code that pertain to soil hazards would reduce expansive soil impacts to **less than significant impact. No mitigation is required.**				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
6e. Response: ***(Source: Site Plan, 2017)*** **No Impact.** The proposed project will be served by the municipal sewer system and would not entail the construction or use of septic tanks or alternative waste water disposal systems. Therefore, there would be **no impact** related to soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems**. No mitigation is required.**				
7. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
7a. Response: ***(Source: GHG Analysis prepared by Birdseye Planning Group, 2017)*** Gases that trap heat in the atmosphere are often referred to as greenhouse gases (GHGs), analogous to the way in which a greenhouse retains heat. Common GHG include water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O_x), fluorinated gases, and ozone. GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHGs, Earth's surface would be about 34° C cooler. However, it is believed that emissions from human				

activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations (Cal EPA, 2006).

Pursuant to the requirements of SB 97, the *CEQA Guidelines* were amended to include feasible mitigation of GHG emissions and analysis of the effects of GHG emissions. The adopted *CEQA Guidelines* provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

The majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence on climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355).

Potential GHG impacts are evaluated per the SCAQMD's recommended/preferred option threshold for all land use types of 3,000 metric tons CO_2E per year. GHG emissions associated with the project's construction period were estimated using the CalEEMod computer program. CalEEMod input parameters and output files are provided as an Appendix B to this Initial Study.

Construction activities would generate greenhouse gas (GHG) emissions associated with equipment operation. Site preparation and grading typically generate the greatest emission quantities because the use of heavy equipment is greatest during this phase of construction. Emissions associated with the construction period were estimated based on the projected maximum amount of equipment that would be used onsite at one time. Air districts such as the SCAQMD have recommended amortizing construction-related emissions over a 30-year period to calculate annual emissions. Construction of the project would generate approximately 173 metric tons of GHG emissions during construction. Amortized over 30 years, the project would generate 6 metric tons as shown in Table 6 below.

Table 6 also shows the new construction, operational, and mobile GHG emissions (including 3 MTE of annual transportation related NOx emissions) associated with the proposed project. Long-term operational emissions consist of area sources, energy use, solid waste, water use, and transportation. Each source and related GHG emissions is shown below. Cumulatively, the estimated emissions would not exceed the 3,000 MT CO_2E annual emission threshold; thus, no mitigation measures would be required to avoid a significant impact under CEQA. GHG emissions would be **less than significant. No mitigation is required.**

Table 6
Combined Annual
Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)	Amortized Emission (CO_2E) (30 years)
Construction	63 metric tons	2.1 metric tons
Operational Area Energy Solid Waste Water Mobile Nitrogen Oxides (NOx)	 0.2 metric tons 39 metric tons 3 metric tons 6 metric tons 78 metric tons 3 metric tons	 0.006 metric tons 1.3 metric tons 0.1 metric tons 0.2 metric tons 2.6 metric tons 0.1 metric tons
Total	**135.02 metric tons**	**5.1 metric tons**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
See Appendix B of Initial Study for CalEEMod program output				
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

7b. Response: ***(Source: City of Riverside, Riverside Restorative Growthprint (RRG), January 2016)***

Less than Significant. The proposed project consists of the construction and operation of 13 condominium residences. As discussed, the project would not exceed the thresholds of significance established for the evaluation of individual projects for GHG emissions. With respect to consistency with plans or policies related to GHG emissions, the City of Riverside adopted the *Riverside Restorative Growthprint* (RRG) in January 2016, which is the combined *Economic Prosperity Action Plan and Climate Action Plan*. The plans comprising the RRG work in together to encourage entrepreneurship and smart growth while advancing the City of Riverside's GHG emission reduction goals. Consistent with the principles outlined in the RRG and Measures SR-2 in the CAP, new buildings would be constructed consistent with Title 24 standards and other applicable building code regulations to ensure energy efficiency such as installing low flow plumbing fixtures and implementing a recycling program to improve energy efficiency and reduce related GHG emissions associated with long-term operation of the project. Other CAP measures include the requirement that construction/demolition waste be recycled (Measure SR-13) to reduce the volume of material entering landfills. With implementation of applicable CAP measures summarized herein, the project will not impede or delay local or statewide initiatives to reduce GHG emissions. Impacts would be **less than significant**. **No mitigation is required.**

8. HAZARDS & HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒

8a. Response: ***(Source: Project Description, 2017)***

No Impact. The proposed project consists of a 13-unit condominium development constructed on a vacant 0.6-acre lot. Aside from the typical materials (i.e., cleansers, automobile fluids, etc.) used and/or stored in small quantities, no hazardous materials would be used, disposed of, stored or transported to/from the site. As a result, **no impacts** are anticipated. **No mitigation is required.**

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒

8b. Response: ***(Source: Project Description, 2017)***

No Impact. The proposed project does not involve the use of any hazardous materials. As such the project will have **no impact** directly, indirectly or cumulatively for creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. **No mitigation is required.**

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

8c. Response: ***(Source: Project Description, 2017)***

No Impact. The nearest school to the project site is Bryant Elementary School which is located at 4324 3rd Street in Riverside approximately 0.5 miles northwest of the site. The school is located more than ¼ mile from the site and as referenced, no hazardous materials would be used or stored on the site. Therefore, the project will have **no impact** regarding emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school directly, indirectly or cumulatively. **No mitigation is required.**

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐

8d. Response: ***(Source: DTSC EnviroStor Database Listed Sites, December 2017, Limited Phase II Environmental Assessment, prepared by SCS Engineers, dated August 25, 2017)***

Less than Significant with Mitigation Incorporated. Both a Phase I and Limited Phase II Environmental Site Assessment were performed for the subject property. The Phase I noted that a gas station/vehicle repair facility and historic dry cleaners had been located on the property. As a result, a Limited Phase II was performed to determine if any hazardous materials remain in subsurface soils and if so, would concentrations create a potentially adverse condition for future residents or require specific methods or the disposal of excavated soil.

As referenced in the Limited Phase II ESA, a screening level human health risk assessment was performed for the project site. The purpose was to estimate both carcinogenic and non-carcinogenic toxicity and potential human health risk associated with long-term exposure to carcinogenic constituents in the soil underlying the site. Of specific focus, was exposure to Volatile Organic Compounds (VOCs) (soil gases) through exposure to vapor emissions. To gather data required for the evaluation, a total of seven soil vapor borings were advanced on the site to a depth of 5 feet below ground surface (bgs). Soil vapor was sampled to assess the possible presence and concentrations of VOCs in the soil vapor beneath the site associated with historical automotive repair, gasoline service station, and dry-cleaning activities. Soil vapor samples were also taken from locations representing proposed building sites.

The Estimated Cancer Risk (ECR) associated with the residential use of the proposed site was found to exceed the acceptable Department of Toxic and Substance Control ECR criterion for the highest reported concentrations of VOCs. With respect to the risk of non-cancer health effects, the risk criterion was not exceeded for residential use of the site. Thus, the health risk evaluation determined that without mitigation, there is significant human health risk for residential use of the proposed site resulting from vapor intrusion. It is important to note that the ethylbenzene concentration from soil vapor sample SV5 is the primary data point causing the significant cancer risk determination. Boring site SV5 is located near the northeast corner of the site adjacent to the alley way and Chestnut Street in the proposed location of the single two-story townhouse building. The health risk evaluation concluded that there is a low likelihood that a theoretical risk exists for future occupants of the proposed residential buildings based on maximum VOC concentrations from soil vapor samples collected from the remaining six soil vapor borings. Thus, without mitigation to address soil vapor associated with boring SV5, the proposed project could have a significant impact associated with hazardous materials.

The Limited Phase II ESA notes that the soil samples obtained for the assessment have unusually high porosity which may be caused by loose, uncompacted soils associated with a previous excavation. Thus, soil characteristics may not be representative of typical site conditions. Further, as reported in the DTSC Vapor Intrusion Guidance referenced in the Limited Phase II ESA, if a soil vapor screening indicates a potential risk, additional data at the subject site can be collected and a more thorough analysis performed. However, a more complete dataset is needed for statistical approximation. This typically implies the collection of at least eight samples as referenced in the Limited Phase II ESA. The samples collected for the Limited Phase II

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

ESA were from soil vapor borings across the site rather than focused in proximity to the proposed building site on or near SV5.

Therefore, mitigation measure HAZARDS-1 would be implemented to ensure potential impacts are **less than significant with mitigation incorporated:**

> **MM HAZARDS-1**: Install a vapor barrier under the footprint of the building proposed for construction over soil boring SV5 or once the final locations/footprints of proposed residential buildings at the site are established, collect samples for both soil vapor and soil physical properties within and in proximity to SV5 as defined in the Limited Phase II ESA. For a dataset to be representative of the health risk associated with a particular building, at least eight soil vapor samples should be collected from soil vapor borings representing the proposed building in the area of sample SV5.
>
> If upon completion of the additional soil vapor sampling, the consultant concludes that the ECR still exceeds the DTSC ECR criterion of 1 in one million ECR, than the vapor barrier over the affected area would still be required.

Petroleum hydrocarbons (TPH) were detected above the laboratory reporting limit in one sample collected by SCS at a depth of 1 foot bgs (sample B4-1 reported at 129 mg/kg TPHo). The RSL for TPH (aliphatic medium) for residential users is 96 mg/kg, and for industrial/commercial users 440 mg/kg; therefore the reported concentrations of TPH at the Site exceed the residential RSL and are below the industrial/commercial RSL. While the risk is likely conservative, the reported concentrations may represent a potential health risk to future residential occupants of the site if open routes of exposure are present to the soil. The site is proposed to be developed with buildings and hardscape, with remaining areas covered with landscaping, with a low likelihood of open routes of exposure to future residents. However, to mitigate any potential risk of exposure, mitigation measure HAZARDS-2 would be implemented to ensure impacts are **less than significant with mitigation incorporated:**

> **MM HAZARDS-2:** Soils from any area on the site that will ultimately not be covered with hardscape or landscaping that may be accessible to the future residential occupants of the site and/or soil that is in areas to be exported (e.g. from footings, utility trenches, etc.), shall be sampled prior to occupancy or prior to export activities to determine if constituents of concern (i.e., total petroleum hydrocarbons) in soil would exceed either risk-based screening criteria and/or waste criteria.
>
> If soil sampling performed in areas of the site that are not paved or covered with landscaping come back from the analytical laboratory with concentrations of total petroleum hydrocarbons that exceed human health based screening criteria, the soil should be either excavated, characterized, and properly disposed of, or covered with a clean soil cap or hardscape to eliminate potential exposure pathways.
>
> For soil that is to be exported from the site that is sampled and analyzed, if soil samples come back from the analytical laboratory with results for total petroleum hydrocarbons that exceed waste criteria, the results of the sampling should be disclosed to receivers of this material. The soil generated by grading activities may need to be disposed of as regulated waste if or to other sites that can accept receiving this soil.

Finally, the following mitigation measure HAZARDS-3 will be implemented to ensure the impacts to the safety of workers who may be at risk of any exposure are **less than significant with mitigation incorporated:**

> **MM HAZARDS-3:** The ***Limited Phase II Environmental Assessment, prepared by SCS Engineers, dated August 25, 2017*** shall be provided to construction/grading contractors working on the site. Construction/grading contractors shall address possible worker exposures by using dust-suppression or –control measures, encouraging hygiene practices such as had washing before eating and at the completion of a job, and washing clothes from the jobsite prior to engaging in other activities off the job site, as is appropriate.

With implementation of the above Mitigation Measures HAZARDS-1, HAZARDS-2, and HAZARDS-3, impacts related to hazardous materials would be **less than significant.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

8e. Response: ***(Source: Riverside County Airport Land Use Compatibility Plan Policy Document (Adopted December 2004), Figure FL-1).***

No Impact. The project site is not located within any airport land use plan area or compatibility zone. Therefore, the project will have **no impact** resulting in a safety hazard for people residing or working in the project area directly, indirectly or cumulatively. **No mitigation is required.**

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒

8f. Response: ***(Source: Riverside County Airport Land Use Compatibility Plan Policy Document (Adopted December 2004)***

No Impact. The project site is not located in proximity to a private airstrip; thus, the project would not expose people residing or working in the project area to excessive noise levels related to a private airstrip and would have **no impact** directly, indirectly or cumulatively. **No mitigation is required.**

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

8g. Response: ***(Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside's EOP, 2002)***

No Impact. The project site is located on the north side of Mission Inn Avenue, a primary east/west arterial located in downtown Riverside. The project will not result in physical alterations to the project site or Mission Inn Avenue that would impair implementation or physically interfere with an adopted emergency plan. Therefore, **no impact**, either directly, indirectly or cumulatively to an emergency response or evacuation plan will occur. **No mitigation is required.**

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

8h. Response: ***(Source: California Department of Forestry and Fire Protection, Fire Severity Zone Map (Riverside County, 2009)***

No Impact. The proposed project is located in an urbanized area where no wildlands exist and the property is not located within a Very High Fire Severity Zone (VHFSZ) or adjacent to wildland areas or a VHFSZ; therefore **no impact** regarding wildland fires either directly, indirectly or cumulatively from this project will occur. **No mitigation is required.**

9. HYDROLOGY AND WATER QUALITY. Would the project:				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐

9a. Response: ***(Source: Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

Less than Significant. The project site is vacant, undeveloped land. On-site drainage would be modified as a result of project construction. The project will create new impervious surfaces (i.e., asphalt, concrete and rooftops) and pervious landscaped areas. Stormwater will be managed by utilizing drainage management areas (DMAs) and Best Management Practices ('BMPs'). Two DMA basins are expected to be constructed; one in the central portion of the property and the other along the western property boundary. The basins would be designed to collect runoff and allow water to percolate into the soil. No off-site release of treated stormwater is proposed as part of the project. In addition to the treatment control mentioned above, the applicant is proposing site design techniques and BMPs including minimizing urban runoff, minimizing the impervious footprint, and removing directly connected impervious areas. These techniques were obtained by maximizing permeable area, constructing to the minimum width and minimizing hardscape, whenever possible.

While the project would modify on-site drainage, it would not alter the course of an existing stream or river that would result in on- or off-site erosion or siltation. Construction of the stormwater treatment system would retain the design capture volume for the project. This would avoid flooding on- or off-site. The BMPs referenced above, combined with compliance of existing statutes will have a **less than significant impact** directly, indirectly and cumulatively on to any water quality standards or waste discharge.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒

9b. Response: ***(Source: Water Quality Management Plan for the Santa Ana River Region of Riverside County, July 2011; Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

No impact. The proposed project is located within the Riverside South Water Supply Basin. This proposed project consists of 13 condominium units. Water demand projections for the Project, as calculated by CalEEMod 2016.3.2, is 0.89 million gallons annually or 2,438 gallons per day. The project is required to connect to the City's sewer system and comply with all NPDES and WQMP requirements that will ensure the proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, there will be **no impact** to groundwater supplies and recharge either directly, indirectly or cumulatively. **No mitigation is required.**

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐

9c. Response: ***(Source: Water Quality Management Plan for the Santa Ana River Region of Riverside County, July 2011; Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

Less Than Significant. The project would provide more than 10,000 square feet of new impervious surface; thus, preparation of a Water Quality Management Plan (WQMP) is required. The purpose of the WQMP is to identify methods that would be

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
implemented both during and after construction to avoid adverse impacts to water quality associated with stormwater runoff. Erosion, siltation and other possible pollutants associated with long-term implementation of projects are addressed as part of the WQMP and grading permit process. The drainage patterns on the site would be modified; however, implementation of Best Management Practices within the WQMP would avoid substantial erosion and/or siltation on- and off-site. No stream or rivers would be affected by the proposed action. Therefore, the project will have a **less than significant impact** directly, indirectly or cumulatively to existing drainage patterns. **No mitigation is required.**				
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
9d. Response: ***(Source: Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.; FEMA Flood Hazard Maps 06065C0710G, August 2008)***				
Less Than Significant. The project site is not located within a 100-year flood plain. The runoff from the project in a developed condition has been studied and would be attenuated on-site. Thus, although the drainage pattern will be altered, the off-site surface discharge will not change from existing conditions. The project would not result in flooding on- or off-site. Therefore, there will be a **less than significant impact** directly, indirectly or cumulatively under this threshold. **No mitigation is required.**				
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
9e. Response: ***(Source:*** **Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)**				
Less Than Significant Impact. Within the scope of the project is the installation of storm water drainage system. Two stormwater basins will be constructed on-site and adequately sized to accommodate runoff from the project site. The project is expected to generate the following pollutants: sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, bacteria and viruses, oil & grease, and pesticides. These expected pollutants will be treated through the incorporation of the site design, source control and treatment control measures specified in the project specific WQMP. Therefore, as the expected pollutants will be mitigated through the project site design, source control, and treatment controls already integrated into the project design, the project will not create or contribute runoff water exceeding capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and there will be a **less than significant impact** directly, indirectly or cumulatively. **No mitigation is required.**				
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
9f. Response: ***(Source:*** **Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)**				
Less Than Significant Impact. As referenced, appropriate site design, source control and treatment control BMPs were incorporated into the project design capture and treat stormwater runoff and other pollutants generally associated with a residential land use, such as trash and debris, motor oil and related material. The project will meet water quality standards as required by the Regional Water Quality Control Board and City of Riverside. A **less than significant impact** to water quality would occur as a result of the proposed project. **No mitigation is required.**				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒

9g. Response: ***(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps 06065C0710G, August 2008)***

No impact. The project site is not located within a 100-year mapped flood zone (FEMA Flood Insurance Rate Map No. 06065C0710G, August 2008). There will be **no impact** caused by this project directly, indirectly or cumulatively as it will not place housing within a 100-year flood hazard area. **No mitigation is required.**

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒

9h. Response: ***(Source: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps 06065C0710G, August 2008)***

No impact. The project site is not located within a 100-year mapped flood zone (FEMA Flood Insurance Rate Map No. 06065C0710G, August 2008). The project would redirect on-site drainage patterns; however, it would not impede or redirect flood flows. As referenced, all drainage would be managed to ensure pre-construction flows off-site are maintained. The project would not expose people or structures to flood hazard from severe storm events. There will be **no impact** caused by this project directly, indirectly or cumulatively as it will not place housing within a 100-year flood hazard area. **No mitigation is required.**

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒

9i. Response: ***(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps 06065C0710G, August 2008; County of Riverside Environmental Impact Report No. 521 Public Review Draft, February 2015)***

No impact. The reservoir nearest the project site is Lake Evans which is located approximately one mile to the north. The project site is not within the inundation zone for Lake Evans per Figure 4.11.2 in the County of Riverside Environmental Impact Report No. 521 Public Review Draft (February 2015). Therefore, the project will not place a structure within a flood hazard or dam inundation area that would expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam and therefore **no impact** directly, indirectly or cumulatively will occur. **No mitigation is required.**

j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

9j. Response: ***(Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality; Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

No impact. Seiches are oscillations of the surface of inland bodies of water that vary in period from a few minutes to several hours. Seismic excitations can induce such oscillations. Tsunamis are large sea waves produced by submarine earthquakes or volcanic eruptions. The project is located well inland from the Pacific Ocean and is not subject to tsunami hazard. As referenced, the project site is not within the inundation zone of the nearest reservoirs; and thus, is not expected to be affected by a seiche if a seismic event were to occur. The project site is flat and does not contain steep slopes that could become unstable during grading or other ground disturbing activities. Therefore, since the City is not located in a coastal area, **no impacts** resulting from tsunamis will occur directly, indirectly or cumulatively. **No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. LAND USE AND PLANNING: Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

10a. Response: ***(Source: General Plan 2025 Land Use and Urban Design Element, Downtown Specific Plan and Project Description, 2017)***

No impact. The project is an infill project currently served by fully improved public streets and other infrastructure and does not involve the subdivision of land or the creation of streets that could alter the existing surrounding pattern of development or an established community. Therefore, **no impact** directly, indirectly or cumulatively to an established community will occur. **No mitigation is required.**

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

10b. Response: ***(Source: Downtown Specific Plan, Project Description, 2017)***

Less than Significant. The proposed project site is located at 4019 Mission Inn Avenue and designated Neighborhood Commercial in the Downtown Specific Plan (amended May 2017). The purpose of the Neighborhood Commercial District is as follows:

> *The Neighborhood Commercial District is intended to provide neighborhood-serving commercial uses to support nearby neighborhoods. The Neighborhood Commercial District promotes a concentration of businesses that provide convenience goods and services frequented by local residents. Development within this District should promote human scale elements while providing a sensitive transition between these uses and neighboring residences.*

The proposed residential use is currently not allowed per the Downtown Specific Plan within the Neighborhood Commercial District; thus, the applicant is processing an amendment to the Downtown Specific Plan-Neighborhood Commercial District to allow the proposed use on the project site with a Conditional Use Permit. The proposed residential use is appropriate for the site from the historic context. As referenced, this site was originally developed as a residential use as were many of the adjacent properties. Further, the proposed residential use is compatible with existing residential uses to the north/northeast along Chestnut Street and west/northwest of the site along Mission Inn Avenue and Brockton Avenue. The project will expand the customer base for existing businesses located across Mission Inn Avenue to the south and generally provide a unifying element to the Mission Inn Avenue corridor by developing a vacant site. Due to the proposed projects location within the Seventh Street Historic District, a Certificate of Appropriateness is required to ensure that the exterior elevations maintain the historic integrity of the area.

In addition, the project site is adjacent to the Raincross District to the east and the Residential District to the north. The Raincross District allows multifamily residential development while the Residential District allows for single family residential development. The proposed 13-unit townhome development is appropriate at this site as it functions as a buffer and transition area from high density to low density residential.

With approval of the requested entitlements, the project will be consistent with the General Plan 2025, Downtown Specific Plan and Zoning Code. The project is not located within a coastal zone. Thus, the proposed project will have a **less than significant impact** on applicable land use plan, policies or regulations directly, indirectly or cumulatively. **No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

10c. Response: ***(Source: General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas)***

No impact. The project site is located on a previously developed/improved site within an urbanized area. The City is a Permittee under the MSHCP; therefore, the project is subject to applicable provisions of the MSHCP. The project site is not located in an area subject to Cell Criteria under the MSHCP and, therefore, has no Conservation requirements toward building out the MSHCP Reserve. Therefore, the project will have **no impact** on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan directly, indirectly, or cumulatively. **No mitigation is required.**

11. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐

11a. Response: ***(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)***

Less than Significant. According to the City of Riverside General Plan Figure OS-1, the Project site is located in an MRZ-3 zone, which indicates that the area contains known or inferred mineral occurrences of undetermined mineral significance; thus, no mineral resources are known on the Project site. This type of mineral resource zone is not considered to be a zone of valuable resources according to the State, which identifies MRZ-2 zones as important mineral resource zones. Therefore, the impacts to known mineral resources are **less than significant** directly, indirectly and cumulatively. **No mitigation is required.**

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

11b. Response: ***(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)***

No Impact. The GP 2025 FPEIR determined that there are no specific areas with the City of Sphere Area which have locally-important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract state-designated resources. The proposed project is consistent with the General Plan 2025. Therefore, there is **no impact** under this threshold. **No mitigation is required.**

12. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

12a. Response: ***(Source: Bolt, Beranek & Newman, Noise Control for Buildings and Manufacturing Plants*, 1987. *Riverside Municipal Code; City of Riverside General Plan Noise Element; Noise Evaluation prepared by Birdseye Planning Group, December 2017)***

Noise levels (or volume) are generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels consistent with the human hearing response, which is most

sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dB, and a sound that is 10 dB less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dB change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while those along arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, L_{eq} is summed over a one-hour period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. Two commonly used noise metrics – the Day-Night average level (L_{dn}) and the Community Noise Equivalent Level (CNEL) recognize this fact by weighting hourly L_{eq} over a 24-hour period. The L_{dn} is a 24-hour average noise level that adds 10 dB to actual nighttime (10:00 PM to 7:00 AM) noise levels to account for the greater sensitivity to noise during that time period. The CNEL is identical to the L_{dn}, except it also adds a 5 dB penalty for noise occurring during the evening (7:00 PM to 10:00 PM).

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called ground borne noise. Ground borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Ground-borne vibration related to human annoyance is generally related to velocity levels expressed in vibration decibels (VdB). However, construction-related groundborne vibration in relation to its potential for building damage can also be measured in inches per second (in/sec) peak particle velocity (PPV) (Federal Transit Administration, May 2006). Based on the FTA's *Transit Noise and Vibration Impact Assessment* and the California Department of Transportation's 1992 *Transportation-Related Earthborne Vibration, Technical Advisory*, vibration levels decrease by 6 VdB with every doubling of distance.

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Residences, hospitals, schools, guest lodging, libraries, and parks are most sensitive to noise intrusion; and therefore, have more stringent noise exposure standards than commercial or industrial uses that are not subject to impacts such as sleep disturbance. Sensitive land uses generally should not be subjected to noise levels that would be considered intrusive in character. Therefore, the location, hours of operation, type of use, and extent of development warrant close analysis in an effort to ensure that noise sensitive receptors are not substantially affected by noise.

Noise Standards

City of Riverside General Plan Noise Element. The City of Riverside General Plan Noise Element (2007) addresses the relationship between noise and noise-sensitive uses and the public health concerns associated with noise. The Noise Element includes guidelines for identifying compatible land uses and establishing appropriate development standards. Figure N-1 identifies existing noise contours along major transportation corridors within the City. The project site is located within the 60 dBA Community Noise Exposure Level (CNEL) contour for Mission Inn Avenue. Objective 4 addresses the minimization of noise from ground transportation sources. Relevant policies include the following:

Policy N–4.1: Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (e.g., earthen berms, landscaped walls, lowered streets, improved technology).

Policy N–4.5: Use speed limit controls on local streets as appropriate to minimize vehicle traffic noise.

City of Riverside Noise Ordinance. Chapter 7.35.10(B)(5) of the Riverside Municipal Code prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration, grading or demolition work between the hours of 7:00 p.m. and 7:00 a.m. on weekdays and between 5:00 p.m. and 8:00 a.m. on Saturdays or at any time on Sunday or federal holidays. Construction that occurs weekdays between 7:00 a.m. and 7:00 p.m. and between 8:00 a.m. and 5:00 p.m. on Saturday's, provided a permit has been obtained from the City as required, is exempt from regulation per 7.35.20(G) of the Riverside Municipal Code.

Per Chapter 7.25, Table 7.25.010A, of the Riverside Municipal Code, the maximum allowable exterior noise level at residences is 55 dBA from 7 a.m. to 10 p.m., and 45 dBA from 10 p.m. to 7 a.m. Table 7.30.015 limits interior noise levels to 45 dBA from 7:00 a.m. to 10:00 p.m. and 35 dBA from 10:00 p.m. to 7:00 a.m.

a)Construction Noise. Temporary, construction-related noise would occur during construction of the proposed project. The noise levels associated with the operation of common construction equipment are shown in Table 7. The noise levels are provided for reference purposes; not all equipment shown would be used for the proposed project. Noise levels are expected to occur within the ranges shown.

Table 7
Typical Construction Equipment Noise Levels

Type of Equipment	Range of Maximum Sound Levels Measured (dBA at 50 feet)	Maximum Sound Levels for Analysis (dBA at 50 feet)
Pile Driver 12,000 to 18,000 ft-lb/blow	81–96	93
Rock Drills	83–99	96
Jack Hammers	75–85	82
Pneumatic Tools	78–88	85
Pumps	74–84	80
Scrapers	83–91	87
Haul Trucks	83–94	88
Cranes	79-86	82
Portable Generators	71-87	80
Rollers	75-82	80
Dozers	77–90	85

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Tractors	77–82	80
Front-End Loaders	77–90	86
Hydraulic Backhoe	81-90	86
Hydraulic Excavators	81–90	86
Graders	79–89	86
Air Compressors	76–89	86
Trucks	81–87	86
Trencher	73-80	80

Source: Bolt, Beranek & Newman, Noise Control for Buildings and Manufacturing Plants, 1987.
dBA = A-weighted decibels, ft-lb/blow = foot-pounds per blow

Construction of the proposed improvements may utilize dozers, tractors, loaders, trucks and a variety of other types of equipment as individual phases of the construction process progress. Noise levels associated with the equipment commonly used will range from 80 to 88 dBA at 50 feet from the source. A doubling of sound energy yields an increase of three decibels, so multiple pieces of equipment operating together may cause relatively small but noticeable increases in noise levels above that associated with one piece of equipment. Assuming two pieces of construction equipment, each producing a noise level of 88 dBA, are operating at one time on the site, the worst-case combined noise level during the site preparation phase of construction is an estimated 91 dBA at a distance of 50 feet from the active construction area.

The nearest sensitive property are single family residences approximately 25 feet north and west of the property line. Assuming a reference level of 91 dBA at 50 feet from the source, noise levels at 25 feet could be as high as 97 dBA assuming an increase of 6 dBA would occur by halving the distance between the source and receiver. While these noise levels could occur, they would be intermittent. Construction noise would be audible at the nearest residences neighboring the site. While noise levels are likely to exceed 55 dBA during periods when construction equipment is operating close to the northern property line. As referenced, Chapter 7.25 of the Riverside Municipal Code allows construction activities between the hours of 7:00 a.m. and 7:00 p.m. weekdays and between the hours of 8:00 a.m. and 5:00 p.m. on Saturdays. Construction occurring consistent with these provisions is exempt from regulation. Thus, noise impacts during construction of each phase would be **less than significant**.

Operational Noise. Operation of the proposed project would generate noise associated with vehicle traffic. To gather data on the general noise environment at the project site, one weekday morning 15-minute noise measurement was taken on December 20, 2017 at the project site. The measurement was taken approximately 30 feet north of Mission Inn Avenue near the center of the site using an ANSI Type II integrating sound level meter. The predominant noise source was traffic on Mission Inn Avenue. The temperature during monitoring was 62 degrees Fahrenheit with no perceptible wind. The Leq during monitoring was 62.8 dBA.

Exterior. Traffic is the primary noise source that would be generated by the proposed project. Thus, whether a traffic-related noise impact would occur is based on whether project traffic, when added to the existing traffic, would cause the Leq to noticeably increase (+3 dBA) or exceed the 55-dBA exterior standard referenced in the Riverside Municipal Code. For a noticeable increase to occur, the sound energy (i.e., traffic volumes or speeds) would need to double. Existing exterior noise levels exceed the day- and nighttime requirement (55 and 45 dBA, respectively) for residential areas as defined in the municipal code. The Project, consisting of the construction of 13 condominium units, would not increase traffic on Mission Inn Avenue or Chestnut Street enough to have a perceptible impact on sound levels at receivers nearest the site. Because the project would

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
not noticeably increase noise levels off-site over ambient conditions, a **less than significant** impact would occur under this threshold. **No mitigation is required.**				
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

12b. Response: ***(Source: Riverside Municipal Code; Noise Evaluation prepared by Birdseye Planning Group, December 2017; Federal Transit Administration's (FTA's) Transit Noise and Vibration Impact Assessment (May 2006); Federal Railroad Administration, 1998)***

Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise; e.g., the rattling of windows from truck pass-by events. This phenomenon is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, groundborne vibration generated by manmade activities attenuates rapidly as vibration rapidly diminishes in amplitude with distance from the source. In the U.S., the ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB).

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. If a roadway is smooth, the groundborne vibration from traffic is barely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction activity on the project site would be temporary and any vibration would likely not persist for long periods. Assuming vibration levels would be simlar to those associated with a large bulldozer, typical groundborne vibration levels would be 87 VdB at 25 feet, 81 VdB at 50 feet, and 75 VdB at 100 feet, based on the Federal Transit Administration's (FTA's) *Transit Noise and Vibration Impact Assessment* (May 2006) as shown in Table 7.

Construction activities that typically generate substantial groundborne vibration include deep excavation and pile driving. Based on the proposed scope of improvements, this type of construction activity is not expected. General construction associated with the project would be confined to the project site and consist of grading and excavation for building footings. It would be temporary in duration and occur consistent with project Conditions of Approval. The closest residences to the site is located approximately 25 feet to the north and west of the property line. Based on the information presented in Table 8, vibration levels would not be perceptible at the nearest receiver during construction assuming a bulldozer is the heaviest piece of equipment used during grading or site clearing.

As discussed, 100 VdB is the threshold where minor damage can occur in fragile buildings. Vibration levels are projected to be under this threshold; thus, structural damage is not expected to occur as a result of construction activities associated with the proposed project.

Table 8
Typical Vibration Source Levels for Construction Equipment

Equipment	Approximate VdB				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	87	81	79	77	75
Loaded Trucks	86	80	78	76	74
Jackhammer	79	73	71	69	67

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Small Bulldozer	58	52	50	48	46

Source: Federal Railroad Administration, 1998

Given the distance between the construction area and the residences, would not exceed the groundborne velocity threshold level of 72 VdB for residences and/or buildings where people sleep as discussed above. Maximum vibration levels could be 81 VdB at 50 feet from the source. The Project would not result in or be exposed to significant groundborne vibration and groundborne noise levels. Impacts would be **less than significant** directly, indirectly, and cumulatively. **No mitigation is required.**

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐

12c. Response: ***(Source: Riverside Municipal Code; Noise Evaluation prepared by Birdseye Planning Group, December 2017)***

Less than Significant. The existing noise environment at the project site consists primarily of traffic on Mission Inn Avenue and Chestnut Street. Post construction, the project would contribute similar noise sources to the existing ambient environment. As referenced above, the proposed project would negligibly increase traffic within the surrounding road network with the greatest concentration on Mission Inn Avenue at the project site. The project would not generate enough traffic to noticeably increase sound levels at residences nearest the site. The addition of project traffic would have no perceptible effect on noise levels as described above. Impacts related to a permanent increase in ambient noise levels will be **less than significant** directly, indirectly and cumulatively. **No mitigation is required.**

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐

12d. Response: ***(Source: Riverside Municipal Code; Noise Evaluation prepared by Birdseye Planning Group, December 2017)***

Less than Significant. As discussed in Response 12a above, implementation of the proposed project would include construction activities that would result in a substantial temporary increase in ambient noise levels in the project site vicinity above levels existing without the project, but would no longer occur once construction is completed. Sensitive receptors in the project vicinity are as close as 25 feet from proposed construction areas. Compliance with the hours specified in the City's Municipal Code regarding construction activities will help reduce construction noise impacts on adjacent noise-sensitive land uses when construction occurs near the project boundaries. Considering the short-term nature of construction and the provisions of the Noise Code, the temporary and periodic increase in noise levels due to the construction which may result from the project are considered **less than significant** directly, indirectly and cumulatively. **No mitigation is required.**

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

12e. Response: ***(Source: Riverside County Airport Land Use Compatibility Plan Policy Document (Adopted December 2004), Figure FL-1)***

No impact. The project site is located approximately 1.5 miles northwest of the Flabob Airport and outside the 55 dBA noise contour for the Flabob Airport. Therefore, the project would not expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. The project would have **no impact** related to airport noise. No mitigation is required. **No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

12f. Response: ***(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas)***

No Impact. Per the General Plan 2025 Program FPEIR, there are no private airstrips within the City that would expose people working or residing in the City to excessive noise levels. Because the proposed project consists of development anticipated under the General Plan 2025, is not located within proximity of a private airstrip, and does not propose a private airstrip, the project will not expose people residing or working in the City to excessive noise levels related to a private airstrip and would have **no impact** directly, indirectly or cumulatively. **No mitigation is required.**

13. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

13a. Response: ***(Source: General Plan Housing Projections 2025, Capital Improvement Program and SCAG's RCP and RTP)***

No impact. The proposed project consists of 13 condominium units, and will provide housing for approximately 37 residents. The proposed project would not require the removal of housing to accommodate improvements. The project would house new residents at densities consistent with the proposed amendment to the Downtown Specific Plan and General Plan 2025. The project would not induce population growth directly as a result of new development or indirectly through the extension of utility infrastructure to a currently unserved area. All improvements would occur on the project site and adjacent street. **No impact** related to population growth would result from project implementation. **No mitigation is required.**

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

13b. Response: ***(Source: Project Description, 2017)***

No impact. The project will not displace existing housing, necessitating the construction of replacement housing elsewhere because the project site is vacant land that has no existing housing that will be removed or affected by the proposed project. Therefore, there will be **no impact** on existing housing either directly, indirectly or cumulatively. **No mitigation is required.**

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

13c. Response: ***(Source: Project Description, 2017)***

No Impact. The project will not displace any people, necessitating the construction of replacement housing elsewhere because the project site is proposed on vacant land that has no existing housing or residents that will be removed or affected by the proposed project. Therefore, this project will **have no impact** on people, necessitating the need for replacement housing either directly, indirectly or cumulatively. **No mitigation is required.**

14. PUBLIC SERVICES.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐

14a. Response: ***(Source: FPEIR Table 5.13-B – Fire Station Locations)***

Less than Significant. The City of Riverside Fire Department provides fire and emergency medical services to the City of Riverside. Fire Station 1 is the nearest station to the project site. It is located at 3401 University Avenue approximately 1/2 mile southeast of the site. Like any development project, the project may increase demand for fire service; however, the project is consistent with the land use designation for the site and would not increase the population beyond what was anticipated in the Riverside General Plan Update 2025. Further, the project would be designed and constructed consistent with applicable codes and standards for access and fire suppression infrastructure. The project would not require the construction of a new fire station to maintain service ratios. Impacts would be **less than significant** under this threshold. **No mitigation is required.**

b. Police protection?	☐	☐	☒	☐

14b. Response: ***(Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)***

Less than Significant. Law enforcement services are provided by the City of Riverside Police Department. The Police Department Field Operations Division is headquartered at the Lincoln Station which is located at 8181 Lincoln Avenue. The Field Operations Division is the largest division of the Police Department and provides first response to all emergencies, performs preliminary investigations, and provides basic patrol services to the City of Riverside. The Field Operations Division has approximately 130 sworn officers, 24 Sergeants, 6 Lieutenant Watch Commanders, 1 Executive Lieutenant, 1 Traffic Lieutenant and a civilian support staff. Officers are assigned to one of four Neighborhood Policing Centers (NPC) within the City of Riverside. The project site is located in the North NPC which is located at 3775 Fairmount Boulevard approximately one block southeast of the project site.

The project consists of 13 new condominium units. Adequate police facilities and services are provided by the North NPC to serve this project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Police Department practices, there will be a **less than significant impact** on the demand for additional police facilities of services either directly, indirectly or cumulatively. **No mitigation is required.**

c. Schools?	☐	☐	☒	☐

14c. Response: ***(Source: Project Description, 2017)***

Less than Significant Impact. The nearest school operated by the Riverside Unified School District is Bryant Elementary School located at 4324 3rd St, Riverside, CA 92501 approximately ½ mile northwest of the site. The project consists of 13 new condominium units. Adequate school facilities and services are provided by the Riverside School District. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through the payment of School District impact fees used to offset the impact of new development, there will be **less than significant impacts** on the demand for school facilities or services either directly, indirectly or cumulatively. **No mitigation is required.**

d. Parks?	☐	☐	☒	☐

14d. Response: ***(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Project Description, 2017)***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Less than Significant Impact. White Park is the nearest park to the project site. It is located at 3936 Chestnut Street in Riverside approximately 2 blocks south of the project site. The project would increase the population (approximately 37 residents) of Riverside which may affect demand for park facilities. The project consists of 13 new condominium units and related on-site improvements. Adequate park facilities and services are provided to serve this project. The project would not remove park or recreational facilities that would require replacement elsewhere. With the payment of impact fees for each unit, the project would cover any fair share costs for the provision of park resources necessary to meet City demand. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Park, Recreation and Community Services practices, there will be **less than significant impacts** on the demand for additional park facilities or services either directly, indirectly or cumulatively. **No mitigation is required.**

e. Other public facilities?	☐	☐	☐	☒

14e. Response: ***(Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)***

No Impact. The project consists of 13 new condominium units and related on-site improvements. Adequate public facilities and services, including libraries and community centers, are provided in the downtown area. The nearest City of Riverside Public Library is located at 3581 Mission Inn Avenue approximately 4 blocks southeast of the site. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Park and Recreation and Community Services and Library practices, there will be **no impacts** on the demand for additional public facilities or services either directly, indirectly or cumulatively. **No mitigation is required.**

15. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

15a. Response: ***(Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)***

Less than significant impact. The project would be a 13-unit condominium development. The project would contribute to an increase in the City of Riverside population which may affect demand for recreational resources. As referenced, White Park is expected to provide adequate recreational services for the project. Further, the project would be required to pay an impact fee per unit to cover improvements to recreational resources. The General Plan 2025 analyzed the proposed Downtown Specific Plan Land Use for this property; however, an amendment to the Downtown Specific Plan is required to ensure consistency with the General Plan 2025. The project is not proposing to develop parks; however, outdoor courtyard open space areas will be provided for each residential unit and the project would pay applicable Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department. Thus, this project will have a **less than significant impact** on recreation resources. **No mitigation is required.**

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

15b. Response: ***(Source: Site Plan)***

No Impact. The project will not include new recreational facilities or require the construction or expansion of recreational facilities; therefore, there will be **no impact** directly, indirectly or cumulatively. **No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. TRANSPORTATION/TRAFFIC. Would the project result in:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
16a. Response: ***(Source: City of Riverside Traffic Impact Analysis Preparation Guide, January 2016 – Exhibit A)***				
Less than Significant. Per the City of Riverside *Traffic Impact Analysis Preparation Guide, Exhibit A* (January 2016), multi-family residential projects with 75 units or less are exempt from the preparation of a traffic impact study. Thus, no further traffic analysis was required for the proposed project. The project would not generate enough traffic to adversely impact the Level of Service (LOS) at the intersections serving the site. While the project would generate traffic, it would not adversely affect applicable congestion management programs, transit, pedestrian or bicycle facilities. Impacts to traffic operations and circulation would be **less than significant. No mitigation is required.**				
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
16b. Response: ***(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways)***				
No Impact. The project site does not include a state highway or principal arterial within Riverside County's Congestion Management Program (CMP) and the project is consistent with the Transportation Demand Management/Air Quality components of the Program; therefore, there is **no impact** either directly, indirectly or cumulatively to the CMP.				
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
16c. Response: ***(Source: Riverside County Airport Land Use Compatibility Plan Policy Document (Adopted December 2004), Figure FL-1)***				
No Impact. Flabob Airport is located approximately 1.5 miles west of the site and is the closest airport. The project site is not located within the Flabob Airport Influence Area per Figure FL-1 in the Riverside County Airport Land Use Compatibility Plan Policy Document (December 2004). The project will not change air traffic patterns, increase air traffic levels or change the location of air traffic patterns. It is not located within an airport influence area. As such, this project will have **no impact** directly, indirectly or cumulatively on air traffic patterns.				
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
16d. Response: ***(Source: Site Plan and Project Description, 2017)***				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

No Impact. Road improvements would be limited to the construction of ingress/egress on the project site. Vehicle access would be provided via Mission Inn Avenue. Pedestrian access only would be provided from Chestnut Street. All construction would occur consistent with city standards. Project design would not increase hazards. **No impact** would occur. **No mitigation is required.**

e. Result in inadequate emergency access?	☐	☐	☐	☒

16e. Response: ***(Source: Project Description, 2017; Riverside Municipal Code)***

No Impact. The proposed project would not alter emergency access routes. Vehicle access would be provided via Chestnut Street. Pedestrian access would be provided from Mission Inn Avenue and Chestnut Street. No project activity would impair emergency access to the area. **No impact** would occur. **No mitigation is required.**

f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities)?	☐	☐	☐	☒

16f. Response: ***(Source: General Plan 2025 Update, Safe Riverside Transit Service Map, 2017)***

No Impact. With the approved Downtown Specific Plan amendment, the project would be consistent with the current General Plan designation for the project site. No inconsistencies with General Plan Circulation Element policies would occur. The project was evaluated for options to reduce vehicle miles traveled associated with operation. Because it is a multifamily residential project, methods commonly employed to reduce vehicle miles traveled (i.e., employee trip reduction programs, transit subsidies, telecommuting, employee van pools and so forth), are not applicable.

The project, as designed, does not create conflicts with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks). Mission Inn Avenue is designated as a Class 2 bicycle path corridor in the General Plan 2025. Riverside Transit provides bus service via Routes 22 and 49. The project would not affect use of Mission Inn Avenue for bicycling, pedestrian access or transit access. Thus, the project will have **no impact** directly, indirectly or cumulatively on adopted policies, plans, or programs supporting alternative transportation. **No mitigation is required.**

17. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				**:**
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☒	☐

17a. Response: (Source: ***Cultural Resource Report and Historical Compatibility Assessment for the 4019 Mission Inn Avenue Project, prepared by Brian F. Smith and Associates, Inc., November 2017*****)***

Impacts would be less than significant. A cultural resources assessment was conducted for the proposed Project by Brian F. Smith and Associates (Brian F. Smith 2017). The assessment included a cultural resources records search at the Eastern Information Center (EIC) at the University of California Riverside and a search of the Sacred Lands File request from the Native American Heritage Commission (NAHC).

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

The analysis of nearby site components and artifacts did not indicate Native American religious, ritual, or other special activities at this location. In addition, a Sacred Land File (SLF) review by the Native American Heritage Commission (NAHC) was performed as part of the cultural resource review process to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one mile of the project. The SLF search results did not identify any sacred sites or locations of religious or ceremonial importance within the search radius.

Given the results of the study and the absence of any potential to encounter cultural historic resources during grading of this property for the proposed project, impacts related to this issue are **less than significant**. **No mitigation is required.**

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

17b. Response: (Source: *Cultural Resource Report and Historical Compatibility Assessment for the 4019 Mission Inn Avenue Project, November 2017*)

Less than Significant Impact. The *Cultural Resource Report and Historical Compatibility Assessment* for the Project, did not identify the presence of significant resources on-site pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1.

Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource." Also per AB 52 (specifically PRC 21080.3.1), Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects. The City commenced tribal notification in accordance with AB 52 on November 30, 2017. Three California Native American tribes (Soboba Band of Luiseño Indians, Rincon Band of Luiseño Indians, and San Manuel Band of Mission Indians) responded as part of the AB 52 consultation effort. San Manuel Band did not request to consult, however requested language regarding inadvertent discoveries be added as a condition. The Soboba Band of Luiseño Indians and Rincon Band of Luiseño Indians requested Government to Government consultation. Consultation which occurred on January 31, 2018. Both tribes also requested a condition approval be added to the project regarding inadvertent discoveries. Consultation with Rincon Band of Luiseño Indians concluded on January 31, 2018. Consultation with Soboba Band of Luiseño Indians concluded on March 27, 2018.

While no occurrence of historic or prehistoric cultural resources has been recorded on site, based on the consultation effort with the Tribes, a potential for such resources cannot be discounted. The Project will comply with State Law. Specifically:

> In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.

According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).

Impacts related to this issue **are less than significant**. **No mitigation is required.**

18. UTILITIES AND SYSTEM SERVICES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐

18a. Response: ***(Source:*** **City of Riverside Public Utilities,** ***Wastewater Integrated Master Plan*****, February 2008)**

Wastewater would be conveyed via existing sewer lines located along Mission Inn Avenue to the Regional Water Quality Control Plant located at 5950 Acorn Street in Riverside, CA, approximately 3.5 miles southwest of the site. The RWQCP provides preliminary, primary, secondary, and tertiary treatment for a rated capacity of approximately 40 million gallons per day (mgd). The City owns and operates a sanitary sewer collection system (collection system) consisting of over 820 miles of sewer lines ranging in size from 4 inches to over 50 inches in diameter with some over 120 years old. There are 19 pump stations located throughout the City that range in size from 100 gallons per minute (gpm) up to 2,000 gpm providing service to those areas of geographic need.

The project would create additional demand on existing facilities. However, per the Integrated Master Plan for Wastewater Collection and Treatment Facilities (2008), projected flows through 2025 would be 52.2 mgd daily. The project is consistent with the General Plan and zoning; thus, wastewater volumes could be accommodated within flows projected for planning purposes. A **less than significant** impact would occur. **No mitigation is required.**

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

18b. Response: ***(Source: City of Riverside Public Utilities, Wastewater Integrated Master Plan, February 2008; City of Riverside Public Utilities, 2010 Urban Water Management Plan, July 2011)***

Less than Significant. The project will not result in the construction of new or expanded water or wastewater treatment facilities. Demand for wastewater treatment and water supply would be consistent with demand projections in the Integrated Master Plan for Wastewater Collection and Treatment Facilities described above and the 2010 Urban Water Management Plan referenced below under 18d. Therefore, the project will have a **less than significant impact** related to the construction of new water or wastewater treatment facilities or the expansion of existing facilities directly, indirectly, or cumulatively, and no mitigation is required. **No mitigation is required.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

18c. Response: ***(Source: Preliminary Geotechnical Investigation and Infiltration Study, Mission Inn Avenue Townhomes, 4019 Mission Inn Avenue, Riverside, California, NOVA Services, Inc.)***

Less Than Significant. The proposed project will result in an increase in impervious surface areas over existing conditions. The increased in impervious surface area will generate increased storm water flows with potential to impact drainage facilities and require the provision of additional facilities. All storm flows will be captured, retained and treated on-site. However, Subdivision Code (Title 18, Section 18.48.020) requires drainage fees to be paid to the City for new construction. Fees are transferred into a drainage facilities fund that is maintained by Riverside County Flood Control and Water Conservation District. This Section also complies with the California Government Code (section 66483), which provides for the payment of fees for construction of drainage facilities. Therefore, the project will have **less than significant impact** on existing storm water drainage facilities that would not require the expansion of existing facilities directly, indirectly or cumulatively. **No mitigation is required.**

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐

18d. Response: ***(Source: City of Riverside Public Utilities, 2010 Urban Water Management Plan, July 2011)***

Less than Significant. The project site is located in the City of Riverside RPU service area. RPUs potable distribution system consists of approximately 940 miles of pipeline ranging from 2 to 72 inches in diameter. The RPU has sixteen reservoirs with a storage volume of approximately 108 million gallons. Water demand projections as calculated by CalEEMod 2016.3.2 (see Appendix B) is 0.89 million gallons annually or 2,438 gallons per day. The proposed project would be required to comply with federal, State and local plans, policies and regulations and Executive Order B-29-15, which requires reduction of potable water use during construction and implementation of Best Management Practices for new development concerning water conservation, both for potable and non-potable uses. Chapter B.3 of the RRG-CAP contains measures that can be implemented to reduce water consumption and related energy costs associated with water reclamation and transport.

Potable water would be provided by RPU. Per the 2010 Urban Water Management Plan, water demand within the service area was 63.2 mgd in 2015. Demand is expected to increase to 74,600 acre feet by 2020 and 86,000 acre feet by 2035. For planning purposes, supply is projected to be 143,226 are feet. Future supply is expected to exceed demand. The project would minimize water demand by installing low flow fixtures and drought tolerant landscaping. No new water entitlements would be necessary to serve the project. Therefore, this project was found to have a **less than significant impact** on water supplies either directly, indirectly or cumulatively. **No mitigation is required.**

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

18e. Response: ***(Source: City of Riverside Public Utilities, Wastewater Integrated Master Plan, February 2008)***

Less than Significant. The project will not exceed wastewater treatment requirements provided in the Integrated Master Plan for Wastewater Collection and Treatment Facilities as referenced above. A **less than significant impact** to wastewater treatment directly, indirectly or cumulatively will occur. **No mitigation is required.**

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐

18f. Response: ***(Source: Cascadia Consulting Group. Waste Disposal and Diversion Findings for Select Industry***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Groups, Integrated Waste Management Board, June 2006; City of Riverside. General Plan 2025, City of Riverside Community Development Department, November 2007)

Less than Significant. The proposed project would generate construction/demolition waste (CDW) as well as ongoing domestic waste from the commercial uses on-site. Solid waste generated in the City of Riverside is collected by Burrtec, Inc. and disposed of in county landfills. The nearest landfill is Badlands Landfill located in Moreno Valley, California. However, it is at or nearing capacity with closure expected by 2022. Thus, solid waste generated by the proposed project would likely be disposed of at the Lamb Canyon landfill. Prior to reaching the landfill, waste would likely be taken to the Agua Mansa Transfer Station/Material Recovery Facility in Riverside, CA for consolidation and transport to the sanitary landfill. The project site is located approximately 26 miles west of the Lamb Canyon Landfill which is located at 16411 Lamb Canyon Road, Beaumont, California. The landfill is owned and operated by Riverside County Department of Waste Resources. The landfill property area consists of approximately 1,189 acres, including 580.5 acres total permitted area, of which 144.6 acres are permitted for solid waste disposal. The current permitted refuse disposal area includes approximately 74 acres of unlined area and approximately 70.6 acres of lined area. The landfill has a permitted capacity of 5,000 tons per day and has an estimated disposal capacity of 15.646 million tons. As of January 1, 2013, the facility had 7.616 tons of remaining disposal capacity. The disposal capacity is expected to last through the year 2021. During 2013, the Lamb Canyon Landfill accepted an average daily volume of 1,638 tons.

It is presumed that construction waste would be comprised of concrete, metals, wood, landscape and typical domestic material. The California Integrated Waste Management Act (CIWMA) of 1989 mandates that all cities and counties in California reduce solid waste disposed at landfills generated within their jurisdictions by 50% and has a long-term compliance goal of 70%. CDW associated with the proposed project will be recycled to the extent practicable with the remainder sent to a landfill. The construction debris would be processed and recycled or sent to the landfill.

According to CalEEMod version 2016.3.2, the project would generate approximately 5.96 tons of solid waste annually Assuming 50% is recycled, a total of 2.98 tons would go to the landfill annually. Assuming Lamb Canyon receives the waste, this would increase the total volume of material going to landfill daily by well under 1 percent. Therefore, **a less than significant impact** to landfill capacity will occur directly, indirectly or cumulatively. **No mitigation is required.**

g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

18g. Response: ***(Source: Cascadia Consulting Group. Waste Disposal and Diversion Findings for Select Industry Groups, Integrated Waste Management Board, June 2006; California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)***

No Impact. The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50% of all solid waste generated by January 1, 2000. The City is currently achieving a 60% diversion rate, well above State requirements. In addition, the California Green Building Code requires all developments to divert 50% of non-hazardous construction and demolition debris for all projects and 100% of excavated soil and land clearing debris for all non-residential projects beginning January 1, 2011. The proposed project must comply with the City's waste disposal requirements as well as the California Green Building Code and as such would not conflict with any Federal, State, or local regulations related to solid waste. Therefore, **no impacts** related to solid waste statutes will occur directly, indirectly or cumulatively. **No mitigation is required.**

19. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				

19a. Response: (Source: *FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)*

Less Than Significant. Potential impacts related to habitat of fish or wildlife species were discussed in the Biological Resources Section of this Initial Study. No impacts to biological resources would occur as a result of the project. Additionally, potential impacts to cultural, archaeological and paleontological resources related to major periods of California and the City of Riverside's history or prehistory were discussed in the Cultural Resources Section of this Initial Study and were found to be **less than significant**. **No mitigation is required.**

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	☒

19b. Response: (Source: *FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)*

No impact. The proposed project would provide a new residential development. Construction of the project would occur consistent with state and local regulations regarding the type of project proposed. This would be consistent with the state's long-term environmental goals by providing new housing consistent with applicable regulations. **No impact** would occur. **No mitigation is required.**

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

19c. Response: ***(Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)***

Less than Significant. As presented in the discussion of environmental checklist Sections I through XVIII, the project would have no impact or a less than significant impact with respect to all environmental issues. No mitigation measures would be required in addition to standard Conditions of Approval to reduce potentially significant impacts to **less than significant**. Consequently, the project along with other cumulative projects would result in a **less than significant** cumulative impact with respect to all environmental issues. **No mitigation is required.**

Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[1]	Monitoring/Reporting Method
Hazardous Materials	**MM HAZARDS-1**: Install a vapor barrier under the footprint of the building proposed for construction over soil boring SV5 or once the final locations/footprints of proposed residential buildings at the site are established, collect samples for both soil vapor and soil physical properties within and in proximity to SV5 as defined in the Limited Phase II ESA. For a dataset to be representative of the health risk associated with a particular building, at least eight soil vapor samples should be collected from soil vapor borings representing the proposed building in the area of sample SV5. If upon completion of the additional soil vapor sampling, the consultant concludes that the ECR still exceeds the DTSC ECR criterion of 1 in one million ECR, than the vapor barrier over the affected area would still be required.	Prior to issuance of grading permit.	Planning Division	Compliance with Project Conditions of Approval.
	MM HAZARDS-2: Soils from any area on the site that will ultimately not be covered with hardscape or landscaping that may be accessible to the future residential occupants of the site and/or soil that is in areas to be exported (e.g. from footings, utility trenches, etc), shall be sampled prior to occupancy or prior to export activities to determine if constituents of concern (i.e, total petroleum hydrocarbons) in soil would exceed either risk-based screening criteria and/or waste criteria. If soil sampling performed in areas of the site that are not paved or covered with landscaping come back	Prior to issuance of grading permit.	Planning Division	Compliance with Project Conditions of Approval

[1] All agencies are City of Riverside Departments/Divisions unless otherwise noted.

	from the analytical laboratory with concentrations of total petroleum hydrocarbons that exceed human health based screening criteria, the soil should be either excavated, characterized, and properly disposed of, or covered with a clean soil cap or hardscape to eliminate potential exposure pathways. For soil that is to be exported from the site that is sampled and analyzed, if soil samples come back from the analytical laboratory with results for total petroleum hydrocarbons that exceed waste criteria, the results of the sampling should be disclosed to receivers of this material. The soil generated by grading activities may need to be disposed of as regulated waste if or to other sites that can accept receiving this soil.			
	MM HAZARDS-3: The ***Limited Phase II Environmental Assessment, prepared by SCS Engineers, dated August 25, 2017*** shall be provided to construction/grading contractors working on the site. Construction/grading contractors shall address possible worker exposures by using dust-suppression or –control measures, encouraging hygiene practices such as had washing before eating and at the completion of a job, and washing clothes from the jobsite prior to engaging in other activities off the job site, as is appropriate.	Prior to issuance of grading permit.	Planning Division	Compliance with Project Conditions of Approval