RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIVERSIDE, CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE REZONING OF PROPERTY PURSUANT TO THE 2014-2021 HOUSING ELEMENT, MAKING CERTAIN FINDINGS OF FACT RELATED THERETO, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM, ALL PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, the City Council of the City of Riverside adopted the 2014-2021 Housing Element on October 10, 2017; and

WHEREAS, as part of the 2014-2021 Housing Element Implementation Plan, specific candidate properties are being rezoned and their land use designation changed to allow for the potential development of multi-family residential units, various Chapters of Title 19 are being amended, and Chapters 6 and 7 of the University Avenue Specific Plan are being amended ("Project"); and

WHEREAS, in accordance with the requirements of the California Environmental Quality Act ("CEQA") (Public Resources Code Section 21000 et seq.), the State of California CEQA Guidelines ("State CEQA Guidelines") (California Code of Regulations Title 14, Chapter 3, Sections 15000 et seq.) and the City of Riverside ("City") CEQA Guidelines (collectively "CEQA Regulations") an Environmental Impact Report ("EIR") was prepared for the Project; and

WHEREAS, in accordance with the requirements of Section 15082(a) of the State CEQA Guidelines, on April 11, 2017, the City prepared and distributed a Notice of Preparation ("NOP") to all appropriate responsible and trustee agencies and to all organizations and individuals requesting notice, stating that an EIR would be prepared for the Project; and

WHEREAS, on April 11, 2017, the NOP was sent to the State Clearinghouse (SCH No. 2017041039); and

WHEREAS, on May 8, 2017, a public scoping meeting was held in order to assist with the initial the preparation of the EIR; and

WHEREAS, all responses to the NOP were considered in the preparation of the Draft EIR and interested agencies and individuals were contacted to secure their input; and

WHEREAS, the Draft EIR was completed and a Notice of Completion ("NOC") and the Draft EIR was filed with the State Clearinghouse on or about September 1, 2017, in accordance with the provisions of section 15085 of the State CEQA Guidelines; and

WHEREAS, copies of the Draft EIR were also sent to various public agencies, organizations and individuals, made available at the City's Planning Division, the Riverside Main Library, and on the City's website, and a Notice of Availability ("NOA") of the Draft EIR was published in the Riverside Press Enterprise, a newspaper of general circulation, mailed to a list of interested parties, and posted with the Riverside County Clerk's Office; and

WHEREAS, the NOC and the NOA provided a 45-day public review period commencing on September 1, 2017, and ending on October 16, 2017; and

WHEREAS, the public review period was extended to October 23, 2017, for a total review period of 52 days; and

WHEREAS, the City received written and oral comments from the public and responsible agencies on the Draft EIR during and after the public comment period; and

WHEREAS, all comments on the Draft EIR concerning environmental issues that were received during the public review period, as well as those received after the public review period, were evaluated by the City as the Lead Agency in accordance with Section 15088 of the State CEQA Guidelines; and

WHEREAS, the City Planning Commission held two (2) duly noticed hearings on the Draft EIR on October 19 and November 2017, and made certain recommendations to the City Council; and

WHEREAS, the Final Environmental Impact Report ("FEIR") dated December 2017, for the Project consists of a Draft EIR dated August 2017, comments and recommendations received on the Draft EIR, responses to comments on the Draft EIR, and list of persons, organizations and public agencies commenting on the Draft EIR; and

WHEREAS, the FEIR contains the elements required by the CEQA Regulations, including, but not limited to: (a) identification, description and discussion of all potentially significant environmental effects of the proposed Project; (b) a description of mitigation measures proposed

to minimize potential significant environmental effects on the project identified in the FEIR; (c) a description of those potential environmental effects which cannot be avoided or can be mitigated but not to a level of insignificance; (d) a description of a range of reasonable alternatives to the proposed Project and evaluation of the comparative merits and potential significant environmental effects of the alternatives; (e) a discussion of cumulative impacts in accordance with the requirements of section 15130 of the State CEQA Guidelines; (f) a discussion of growth inducing impacts; (g) a discussion of significant irreversible environmental changes; (h) a discussion of energy conservation; and (i) a list of all federal, state and local agencies, other organizations and private individuals consulted in preparing the FEIR and the firm preparing the FEIR; and

WHEREAS, the FEIR includes comments received on the Draft EIR and written responses to those comments, the focus of which is on the disposition of significant environmental issues raised in the comments, as specified by CEQA Guidelines section 15088(b); and

WHEREAS, the City Council held a duly noticed hearing on the FEIR on December 12, 2017, at which time additional written and oral testimony was received; and

WHEREAS, the City Council has been presented with and is familiar with the information in the administrative record, including the Staff Reports and the written and verbal testimony submitted thereon, and has reviewed and considered the information in the FEIR for completeness and compliance with the CEQA Regulations, has independently reviewed and analyzed the FEIR and has duly heard and considered the Staff Reports and all written and oral arguments presented at its meeting of December 12, 2017; and

WHEREAS, the City has made the written findings set forth in Findings of Fact and Statement of Overriding Considerations ("Findings/SOC") attached hereto as Exhibit "A" and incorporated herein by reference, for each potentially significant environmental impact identified in the FEIR pursuant to State CEQA Guidelines Section 15091 based upon all of the evidence in the administrative record, including, but not limited to the FEIR, written and oral testimony given at meetings and hearings, and submission of testimony from the public, organizations and regulatory agencies, and has determined that the Findings contain a complete and accurate reporting of the environmental impacts and mitigation measures associated with the Project, as

well as complete and accurate reporting of the unavoidable impacts and benefits of the Project; and

WHEREAS, approval of the Project will result in significant effects which are identified in the FEIR that cannot be avoided or substantially lessened; and

WHEREAS, the City has stated in writing the specific reasons to support its action to approve the Project, despite its significant environmental impacts, based on the FEIR and other information in the record, including in the Findings/SOC set forth in Exhibit "A" attached hereto; and

WHEREAS, the City Council certifies that (1) the FEIR for the Project has been completed in compliance with CEQA; (2) that the FEIR was presented to the City Council, and that the City Council reviewed and considered the information contained in the FEIR prior to making a decision on the Project; and (3) the FEIR reflects the City's independent judgment and analysis, and has reviewed and considered all comments received during the public review process and at the public hearings; and

WHEREAS, the City Council found that the Project identified in the FEIR incorporated alterations or mitigation measures that avoid or substantially lessen potentially significant environmental effects associated with the Project to the fullest extent feasible; and

WHEREAS, in accordance with the requirements of the CEQA Regulations, a Mitigation Monitoring and Reporting Program was prepared that identified (i) all feasible measures required to mitigate potentially significant impacts, and (ii) standards and requirements contained in Ordinances and State Laws with which the Project will be required to comply, which Mitigation Monitoring and Reporting Program is attached hereto as Exhibit "B" and incorporated herein by reference; and

WHEREAS, the City has not received any comments or additional information that constitutes substantial new information requiring recirculation under Public Resources Code section 21092.1 and State CEQA Guidelines section 15088.5; and

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WHEREAS, all requirements of the CEQA Regulations have been satisfied by the City in the EIR, which is sufficiently detailed so that all of the potentially significant environmental effects of the Project have been adequately evaluated.

NOW, THEREFORE, IT IS RESOLVED by the City Council of the City of Riverside, California, and making the following findings, as follows:

Section 1: The above recitals are hereby found and determined to be true and correct and are hereby incorporated herein as if stated in full.

Section 2: The City Council hereby makes the following findings and conclusions:

(a) The FEIR for the Project has been completed and processed in compliance with the requirements of CEQA;

(b) The FEIR was presented to the City Council, and the City Council, as the decision-making body for the City, reviewed and considered the information contained in the FEIR and the administrative record as a whole, which includes, but is not limited to, staff reports, testimony and information received, and scientific and factual data presented in evidence during the review process, prior to approving the Project; and

(c) The FEIR reflects the City's independent judgment and analysis.

Section 3: The City Council hereby finds that any changes to the FEIR in response to comments received on the Draft EIR merely clarify, amplify or make insignificant modifications to an already adequate EIR pursuant to CEQA Guidelines Section 15088.5(b) and that no significant new information has been received that would require recirculation.

Section 4: The City Council finds that the Findings/SOC set forth in Exhibit "A," attached hereto and incorporated by reference herein as if stated in full, are supported by substantial evidence in the administrative record and are hereby adopted by the City Council.

Section 5: Potential environmental effects have been studied and, except as stated in Section 8 below, there is no substantial evidence in the record, as a whole, that supports any argument that the Project, as designed and mitigated, may cause a significant effect on the environment. No facts, reasonable assumptions predicated on facts, testimony supported by

adequate factual foundation, or expert opinion supported by facts has been submitted that refute the conclusions reached by the FEIR, studies, data and reports. Nor does anything in the record alter the environmental determination, as presented, based upon investigation and independent assessment of those studies, data and reports. No new significant impacts have been raised by any commenting individual or entity, nor has any significant new information been added to the FEIR that would require recirculation under State CEQA Guidelines section 15088.5.

Section 6: The FEIR dated December 2017, for the Project reflects the independent judgment of the City based upon the findings and conclusions stated in the FEIR, staff reports, and in consideration of testimony and information received, and scientific and factual data presented in evidence during the review process.

Section 7: The City Council Finds that the FEIR dated December 2017, has fully examined the environmental impacts of the Project and, based on the information in the administrative record, including the analysis in the FEIR, has determined that the impacts on aesthetics, agricultural and forestry resources, air quality - odors, biological resources, cultural/paleontological resources (except for specific structures of merit and landmarks), energy use/conservation, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning (except for conflicting with SCAG land use plans, policies or regulation), mineral resources, noise (except long term impacts related to traffic), population and housing, public services, recreation, transportation/traffic – pedestrian, bicycle and transit facilities, and utilities and service systems either have no impact, are less than significant or are potentially significant but that with mitigation the impacts are reduced to less than significant based on the Findings/SOC set forth in Exhibit "A" attached hereto and incorporated herein by reference, as well as the findings and analysis contained in the FEIR (collectively "Findings"). The Findings are supported by substantial evidence contained therein as well as in the record, and as such, said Findings are hereby adopted by the City Council.

Section 8: The City Council finds that the FEIR dated December 2017, has fully examined the environmental concerns associated with the Project and, based on the information in the administrative record, including the analysis in the FEIR, has determined that the following

significant impacts, identified in the FEIR, cannot be mitigated to a level of insignificant: air quality (except for odor), cultural resources as to specifically identified structures of merit and landmarks, greenhouse gas emissions, land use and planning as to Southern California Association of Governments Adopted Growth Forecasts, noise as to long-term impacts related to traffic, and transportation/traffic (except for pedestrian, bicycle and transit facilities). As explained in the Findings/SOC attached hereto as Exhibit "A," the City Council finds pursuant to Public Resources Code section 21081(a)(3) that specific economic, legal, social, technological or other considerations make infeasible additional mitigation measures or alternatives that would substantially lessen such impacts. The City Council further finds, pursuant to Public Resources Code section 21081(a)(1) and as explained in the Findings/SOC (Exhibit "A") that changes or alterations have been incorporated into the Project which mitigate or avoid those significant impacts identified in the FEIR to the fullest extent feasible.

Section 9: With the exception of the impacts identified in Section 8 above, the City Council finds that, the Project, including all mitigation measures, conditions, permits and approvals will not have any other significant adverse unmitigated impacts on the environment. Potential environmental effects have been studied and there is no substantial evidence in the record, as a whole, that supports any argument that the Project, as designed and mitigated, would cause a significant effect on the environment, except as to the impacts identified in Section 8. No facts, reasonable assumptions predicated on facts, testimony supported by adequate factual foundation, or expert opinion supported by facts has been submitted that refute the conclusions reached by the FEIR, studies, data and reports. Nor does anything in the record alter the environmental determination, as presented, based upon investigation and independent assessment of those studies, data and reports

Section 10: The City Council finds that two (2) alternatives were considered and rejected from further consideration as set forth in attached Exhibit "A" Findings/SOC. The City Council further finds that three (3) alternatives were identified and analyzed in the FEIR and all were rejected as failing to meet most of the Project objectives and/or as infeasible, due to specific economic, legal, social technological and other considerations. These grounds are contained in

the administrative record, including the FEIR, the Findings/SOC set forth in Exhibit "A" and the written and verbal testimony. Specifically:

(a) Alternative 1 – No Project. This Alternative was rejected because even though it could avoid the Project's significant and unavoidable impacts, it fails to meet any of the Project objectives and would be in direct conflict with California Government Code section 65583 in identifying and providing for housing opportunities.

(b) Alternative 2 – Vacant Sites Only. This Alternative was rejected and determined not to be feasible because even though it would reduce the Project's significant and unavoidable impacts, it would not meet most of the Project objectives and it would be in direct conflict with California Government Code section 65583 since it would not meet the City's Regional Housing Needs Assessment as required.

(c) Alternative 3 – Impacted Sites Excluded. This Alternative was rejected and determined not to be feasible because although this Alternative would have reduced impacts to the City's designated historical resources, it would not reduce the significant and unavoidable impacts to air quality, greenhouse gas emissions, land use and planning, noise, and transportation/traffic. While this Alternative 3 would achieve all the Project Objectives, it would result in approximately fifteen percent (15%) less housing.

Section 11: The FEIR dated December 2017, for the Project has been completed and processed in compliance with the requirements of the CEQA Regulations (both state and local), and based on the entirety of the administrative record is hereby certified.

Section 12: The City Council has balanced the benefits of the adoption of the Project against its unavoidable environmental impacts and has determined that for the reasons set forth below, the economic, legal, social, technological and other benefits of the Project outweigh the unavoidable adverse environmental effects which have been identified in the Findings/SOC attached as Exhibit "A" and the adverse environmental effects are therefore considered acceptable. In making its determination, the City Council has indicated its intention to approve the Project and

hereby adopts the Statement of Overriding Considerations contained in Exhibit "A" which sets forth the considerations made by the City Council. The benefits of implementing and approving the Project are summarized as follows:

(a) Brings the City in compliance with State law by having a sufficient supply of properties available for affordable housing opportunities.

(b) Improves transit-oriented and pedestrian-friendly development patterns by providing for a variety of mixed-uses and land use patterns that greatly influence traffic patterns and volumes.

(c) Future development would benefit the local economy by providing jobs and encouraging the investment of local resources in local projects. Specifically, future development would provide local jobs during both construction and operation.

(d) The candidate sites chosen as part of the 2014-2021 Housing Element Update Housing Implementation Plan were carefully selected based on their ability to support future development, particularly concerning possessing a minimum lot size for multi-family residential development.

(e) Future development accommodated through Project implementation has the potential to revitalize the visual character and quality of partially developed and developed uses within the City through redevelopment, reversing the spread of blight and deterioration and improving community pride and safety. Project implementation would revitalize older areas of the City to ensure tax dollars are no longer diverted to meet the demands of blighted areas.

These findings are supported by substantial evidence and the data to support these overriding considerations are found throughout the FEIR, the supporting comments and responses section of the FEIR, and by information throughout the administrative record.

Section 13: The City Council finds that all significant environmental impacts from implementation of the Project have been identified in the FEIR and, with the implementation of the mitigation measures set forth in the Mitigation Monitoring and Reporting Program contained in Exhibit "B" attached hereto and incorporated herein by reference, will be mitigated to a less-than-significant level, with the exception of the impacts identified in Section 8 above. The City

Council hereby adopts the Mitigation Monitoring and Reporting Program for the Project to implement the policies, goals and implementation measures identified in the FEIR as necessary to preclude the need for further mitigation measures. Said Mitigation Monitoring and Reporting Program, contained in the FEIR and attached hereto as Exhibit "B", is hereby incorporated as part of the approval of the City Council for the adoption of the Project.

Section 14: Specific environmental, economic, social, legal, technical and other considerations and benefits derived from the development of the Project override and make infeasible any alternative to the Project or further mitigation measures beyond those incorporated into this Project.

Section 15: The City Council hereby finds that the locations of documents and other materials which constitute the record of proceedings upon which its decision is based are the Community & Economic Development Department, Planning Division and the City Clerk's Office located at 3900 Main Street, Riverside, California 92522, and the custodian of such records shall be the Community & Economic Development Director and the City Clerk, respectively.

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ADOPTED by the City Council this _____ day of _____, 2017.

_____
WILLIAM R. BAILEY, III
Mayor of the City of Riverside

_____
COLLEEN J. NICOL
City Clerk of the City of Riverside

I, Colleen J. Nicol, City Clerk of the City of Riverside, California, hereby certify that the foregoing resolution was duly and regularly introduced at a meeting of the City Council on the ____ day of _____, 2017, by the following vote, to wit:

Ayes:

Noes:

Abstain:

Absent:

IN WITNESS WHEREOF I have hereunto set my hand and affixed the official seal of the City of Riverside, California, this ___ day of _____, 2017.

_____
COLLEEN J. NICOL
City Clerk of the City of Riverside

CA 17-1763
11/27/17

Exhibit "A"

CEQA Findings of Fact and Statement of Overriding Considerations for the City of Riverside 2014-2021 Housing Element Update Housing Implementation Plan

1.0 PROJECT BACKGROUND

The Housing Element is one of the seven General Plan Elements mandated by the State, as expressed in California Government Code (CGC) Sections 65580 to 65589.8. State law requires that the Housing Element consist of "an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement and development of housing."

The *City of Riverside 2014-2021 General Plan Housing Element* (Housing Element) is one of 12 the City of *Riverside General Plan 2025* (GP 2025) Elements. The Housing Element provides objectives, policies, and programs to allow for the development, preservation, and improvement of housing. Pursuant to State law (CGC Section 65583), the Housing Element is composed of five parts: 1) Housing Needs Assessment; 2) Constraints Analysis; 3) Housing Resources; 4) Program Evaluation; and 5) Housing Plan. These five sections are organized further into three separate but complementary documents: Housing Technical Report; GP 2025 Housing Element chapter; and Implementation Plan. The Housing Technical Report analyzes the City's housing needs, constraints, and resources. The GP 2025 Housing Element Chapter summarizes the Housing Technical Report's major findings and identifies objectives and policies for the development, maintenance, and improvement of City housing and neighborhoods; see DEIR Section 2.5, Project Characteristics. Refer below for a discussion on the Housing Implementation Plan.

HOUSING IMPLEMENTATION PLAN

Housing Element objectives and policies are implemented through various actions (tools) included in the Housing Implementation Plan and specifically intended to encourage housing/neighborhood maintenance, improvement, development, and conservation. The Housing Implementation Plan describes the housing programs from which the quantified objectives are derived, and which are intended to accommodate the City's remaining Regional Housing Needs Assessment (RHNA) allocation of 4,767 dwelling units (DU). The Housing Implementation Plan specifies the following key actions, among others:

- *Tool H-21 – Rezoning Program.* After accounting for projects-in-the-pipeline and currently identified available sites zoned for residential development, the City has a remaining RHNA need of 4,767 DU for lower-income households. To accommodate the housing need for the remaining 4,767 DU affordable to lower-income households, the City would rezone at least 191 acres of vacant or underutilized land achieving at least an average density of 25 dwelling units per acre (DU/AC). The City has identified 395 acres (as many as 69 sites) for General Plan Amendments/Zone Changes/Specific Plan Amendments, with a development potential of as many as 11,715 DU and as much as 7.2 million square feet (SF) of non-residential uses. Overall, implementation of Tool H-21 is anticipated to result in a net increase of as many as 11,649 DU and as much as 5.9 million SF of non-residential uses (providing approximately 13,657 jobs) over existing conditions, which would far exceed the City's housing need of 4,767 DU.

- *Tool H-26 – Zoning Code Incentives*. Implementation Plan Tool H-26 includes Zoning Code incentives that would promote diversity in housing types, sustainability, and affordability such as amendments to second dwelling units (accessory dwelling units), nonconformities, and land use provisions as they relate to multiple-family residential and other residential uses. Proposed amendments to Riverside Municipal Code (RMC) Title 19, Zoning would include, but are not limited to, amendments to Site Plan Review and Design Review permit requirements, R-3-1500 and R-4 Multi-Family Residential Zones development standards, and the Mixed-Use Urban (MU-U) and Mixed-Use Village (MU-V) Zones to ensure multi-family residential uses are allowed "by right" in these zones, and to reduce/minimize barriers to multi-family residential development in these zones.

- *Tool H-47 – Supportive and Transitional Housing*. The City proposes a Zoning Code amendment to permit supportive and transitional housing the same as any other residential use in zones where residential uses are permitted to comply with State Senate Bill 2 (SB2). An amendment to make transitional and supportive housing "by right" uses would not affect the Rezoning Program sites identified as part of Tool H-21 – Rezoning Program.

- *Tool H-53 – Single-Room Occupancies*. In compliance with AB 2634, the City proposes a Zoning Code Amendment to define Single Room Occupancy (SRO) units and permit them with a conditional use permit within the MU-U Zone only.

Refer to DEIR Section 2.5, *Project Characteristics* for more information on the Housing Implementation Plan and its associated actions.

RIVERSIDE GENERAL PLAN 2025

The existing GP 2025 land use designations for each of the 303 parcels that make up the candidate sites are specified in DEIR Appendix D, *Candidate Sites Table* and described in DEIR Table 2-1, *Existing General Plan 2025 Land Use Designations*. The Project proposes to change the candidate sites' existing General Plan land use designations to ensure consistency with the proposed Zoning Map amendments and accommodate DUs assigned to the RHNA. The proposed General Plan land use designations are specified in DEIR Appendix D and described in DEIR Table 2-6, *Proposed General Plan Land Use Designations*.

MUNICIPAL CODE

The existing zoning base and overlay zones for each of the 303 parcels that make up the candidate sites are specified in DEIR Appendix D and described in DEIR Table 2-7, *Existing Zoning*. The Project proposes to change the candidate sites' base zones to either Mixed-Use Urban (MU-U), Mixed-Use Village (MU-V), High Density Residential – (R-3-1500), or Very High Density Residential (R-4) Zones, and remove overlay zones, including Neighborhood Commercial (NC), Building Stories (S), Residential Protection (RP), and Building Setbacks (X) Overlay Zones, where applicable, to accommodate DUs assigned to the RHNA. The proposed zoning is specified in DEIR Appendix D and described in DEIR Table 2-7, *Proposed Zoning*.

Based on the proposed zoning, the 69 candidate sites' development potential would be as many as 11,715 DU and as much as 7.2 million SF of non-residential uses. The residential (approximately 66 DU) and non-residential (approximately 1.3 million SF) uses located on the candidate sites would be replaced by the proposed residential and mixed-uses. Overall, Project implementation is anticipated to result in a net increase of as many as 11,649 DU and as much as 5.9 million SF of non-residential uses over existing conditions.

DRAFT EIR REVIEW PROCESS

Pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code, Sections 21000 et seq.), specifically Public Resources Code Section 21067, and the CEQA Guidelines (California Code of Regulations Sections 15000 et seq.), specifically CEQA Guidelines Section 15367, the City is the lead agency for the Project. Pursuant to CEQA and the CEQA Guidelines, the City determined that an EIR should be prepared to analyze the Project's potential adverse environmental impacts and reasonable alternatives.

The Project was subject to review under CEQA through preparation of a Notice of Preparation (NOP) and Project Information Packet and Environmental Checklist (Packet/Checklist), which were distributed on April 11, 2017 to various responsible agencies, trustee agencies, and interested parties. The NOP and Packet/Checklist were sent to the State Clearinghouse (State Clearinghouse No. 2017041039), and distributed to responsible and affected agencies and other interested parties for a 30-day public review period beginning April 12, 2017 and concluding May 11, 2017. The Project's NOP identified that impacts for the following environmental issue areas could be "potentially significant," and would therefore be evaluated in detail in the EIR: air quality; biological resources; cultural and tribal cultural resources; greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; public services and recreation; transportation and traffic; and utilities and service systems. Several responsible and affected agencies and other interested parties commented on the NOP; refer to DEIR Table 1-1, *Summary of Comments Received During NOP Review*, and DEIR Appendix B, *Notice of Preparation Comment Letters*.

The NOP provided notice of a Scoping Meeting for the Project, which was held on May 8, 2017 (6:00 PM to 8:00 PM) in the Mayor's Ceremonial Room, Riverside City Hall 7th Floor, 3900 Main Street, Riverside, CA 92522; see DEIR Section 1.2, *Notice of Preparation/Early Consultation (Scoping)*. Additionally, two Workshops were held on May 18, 2017 for the Housing Element Update and Housing Implementation Plan. The Planning Commission Workshop was held at 9:00 AM, while the Evening Workshop was held from 6:00 to 8:00 PM. Both workshops were held at the Riverside City Council Chambers, City Hall 1st Floor, 3900 Main Street, Riverside, CA 92522. The Planning Commission Workshop's purpose was to inform and update the Planning Commission on the City's 2014-2021 Housing Element Update and Housing Implementation Plan. Overviews of the State Housing Element law, Housing Element process, progress to date, approach for the Housing Element Housing Implementation Plan, schedule, and next steps were provided. Similarly, the Evening Workshop's purpose was to inform the public on the City's 2014-2021 Housing Element Update and Housing Implementation Plan. Opportunities for public input were provided at both workshops.

The comments received during the NOP review period did not change the issue areas that the NOP and Packet/Checklist determined would be discussed in the EIR. The issues and concerns raised during the Project's scoping process were fully analyzed in the EIR.

The Project's DEIR was circulated for a 45-day public review period through the Governor's Office of Planning and Research, State Clearinghouse, and Riverside County Clerk, from September 1, 2017 through October 16, 2017. The City subsequently extended the public review to October 23, 2017, resulting in an overall public review period of 52 days. Pursuant to CEQA Guidelines Section 15086, during the comment period, the City consulted with and requested comments from all responsible and trustee agencies, and regulatory agencies, among others. Several methods were used to elicit comments on the DEIR. The Notice of Availability (NOA) was mailed to various agencies and organizations, and to interested individuals that had previously requested such notice, and the NOA was published in the Riverside Press Enterprise on September 8, 2017. The DEIR was made available for public review at the City of Riverside Planning Division, located at 3900 Main Street, Riverside, California 92522, and at the Riverside Main Library, located at 3581 Mission Inn Avenue, Riverside, California 92501. The DEIR was also posted on the City

Planning Division website at http://www.riversideca.gov/planning/housing-element.asp and http://riversideca.gov/ceqa/. Additionally, members of the public and agencies were invited to comment on the DEIR during a public hearing before the Planning Commission on October 19, 2017. The October 19, 2017 Planning Commission hearing was continued to November 2, 2017. During both hearings, City staff presented an overview of the Project, summarized the DEIR findings, and invited the public and agencies to participate in the CEQA process. The hearings were held at the City of Riverside City Hall Art Pick Council Chamber located at 3900 Main Street, Riverside, CA 92522. The comments received during the public review period, including those received at the public hearings, are included in FEIR Section 11.3.

FINAL EIR AND RESPONSE TO COMMENTS

As discussed above, the Project's DEIR was circulated for a 52-day public review period, which began on September 1, 2017 and ended on October 23, 2017. DEIR Table 11-1, *List of Public Agencies, Persons, and Organizations Commenting on the DEIR*, lists the public agencies, persons, and organizations commenting on the DEIR during the public review period and at the public hearings before the Planning Commission (October 19, 2017 and November 2, 2017). DEIR Table 11-1 also lists the public agency comments received after the close of the public review period. According to CEQA Guidelines Section 15088(a), the lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments. Accordingly, DEIR Section 11.3, *Comments and Responses*, provides the City's proposed responses to significant environmental points raised in the comments, as well as a copy of each written comment received on the DEIR. On December 12, 2017, the City Council held a public hearing to consider the FEIR associated with the Project.

2.0 INCORPORATED DOCUMENTS/RECORDS OF PROCEEDINGS

The following information is incorporated by reference and made part of the record supporting these findings:

- All Project plans and materials including the Project's supportive technical reports;
- The DEIR, DEIR Technical Appendices, FEIR, and all documents relied upon or incorporated by reference;
- All documents and materials making up the City Planning Commission Staff Reports for this project heard on October 19 and November 2, 2017.
- The Project's Mitigation Monitoring and Reporting Program; see FEIR Section 10.0);
- City of Riverside General Plan 2025 (GP 2025) (Cotton/Bridges/Associates, November 20, 2007). Adopted by Resolution No. 21536 on November 20, 2007, as amended since original adoption.
- City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report (GP FPEIR) (Albert A. Webb Associates, November 2007), State Clearinghouse No. 2004021108 - Certified by Resolution No. 21535 on November 20, 2007.
- City of Riverside General Plan 2025 Program Recirculated Draft Program Environmental Impact Report (Albert A. Webb Associates, July 2007), State Clearinghouse No. 2004021108 - Certified by Resolution No. 21535 on November 20, 2017.

- 1st Addendum to the Certified City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report - Adopted by Resolution No. 21790 on February 24, 2009.

- 2nd Addendum to the Certified City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report - Adopted by Resolution No. 21930 on November 10, 2009.

- 3rd Addendum to the Certified City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report - Adopted by Resolution No. 22360 on March 20, 2012.

- 4th Addendum to the Certified City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report - Adopted by Resolution No. 22437 on July 26, 2012.

- 5th Addendum to the Certified City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report - Adopted by Resolution No. 22470 on November 13, 2012.

- 6th Addendum to the Certified City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report - Adopted by Resolution No. 22581 on October 22, 2013.

- 7th Addendum to the Certified City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report - September 27, 2016.

- 8th Addendum to the Certified City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report - Adopted by Resolution No. 23236 on October 10, 2017.

- Riverside Municipal Code (RMC);

- All records of decision, resolutions, staff reports, memoranda, maps, exhibits letter, synopses of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;

- Any documents expressly cited in these findings, in addition to those cited above; and

- Any other materials required for the record of proceedings by Public Resources Code Section 21167.6, subdivision (c).

The documents and materials that constitute the record of proceedings on which these Findings are based are available at the Riverside City Hall with the Planning Division and the City Clerk's Office, located at 3900 Main Street, Riverside, California 92522. The custodians for these records are the Community Development Director and the City Clerk, respectively. This information is provided in compliance with Public Resources Code Section 21081.6.

3.0 INDEPENDENT JUDGEMENT FINDING

The City selected and retained Michael Baker International (Michael Baker) to prepare the EIR. Michael Baker prepared the EIR under the supervision and direction of the City's planning staff.

Finding: The EIR for the Project reflects the City's independent judgment. The City has exercised independent judgment in accordance with Public Resources Code Section 21082.1(c)(3) in retaining its own environmental consultant, directing the consultant in preparation of the EIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

4.0 ENVIRONMENTAL IMPACT FINDINGS

The following findings of fact are based on information contained within the DEIR and FEIR, which have been deemed adequate and consistent with CEQA, and include information received during the public review process. This section provides a summary of the Project's significant environmental effects that are discussed in the EIR, and provides written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.

City staff reports, the EIR, written and oral testimony at public meetings or hearings, these facts and findings, and other information in the administrative record, serve as the basis for the City's environmental determination. These findings are supported by substantial evidence in the record of proceedings before the City, as summarized below. Further explanation of these environmental findings and conclusions can be found in the DEIR and FEIR, and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the FEIR's determinations regarding mitigation measures and the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the City ratifies, adopts, and incorporates in these findings the determinations and DEIR/FEIR conclusions concerning environmental impacts and mitigation measures except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

These findings are for the Project as defined in the DEIR. As evaluated in the DEIR, the Project includes the rezoning of 69 candidate sites within the City's boundaries. The candidate sites are comprised of 303 parcels and total approximately 395 acres. Three alternatives were analyzed as part of the DEIR and FEIR, and rejected by the City Council; refer to Section 5.0 below.

On December 12, 2017, the City Council determined that, based on all of the evidence presented, including but not limited to the DEIR and FEIR (together, "the EIR"), written and oral testimony given at hearings and meetings, and submission of testimony from the public, organizations, and public agencies, the following environmental impacts of the Project are: (1) less than significant and do not require mitigation; (2) potentially significant but will be avoided or reduced to less than significant through the identified mitigation measures; or (3) significant and unavoidable and cannot be mitigated to less than significant.

4.1 Findings Regarding Less Than Significant Impacts Not Requiring Mitigation

Consistent with Public Resources Code Section 21001.2 and CEQA Guidelines Section 15128, the EIR focused its analysis on potentially significant impacts and limited discussion of other impacts for which it can be seen with certainty there is no potential for significant adverse environmental effects. CEQA Guidelines Section 15091 does not require specific findings to address environmental effects that an EIR identifies as "no impact" or as a "less than significant impact." Notwithstanding, the City Council hereby finds that the Project would have either no impact or a less than significant impact to the following environmental issue areas:

A. AESTHETICS

1. Scenic Resources

Threshold: Would the Project have a substantial adverse effect on a scenic vista?

Finding: Less Than Significant Impact. (DEIR pages 7-1 to 7-2)

Explanation: As discussed in DEIR Section 7.0, *Effects Found Not To Be Significant*, future development which would be accommodated through the proposed Project's General Plan Amendments/Zone changes would be subject to relevant GP 2025 policies (including, but not limited to Policy LU-3.1 and Policies OS-2.1 through OS-2.4) and RMC standards. Pursuant to RMC standards and as part of each project's design review process (RMC Chapter 19.710), the City would assess all future development on a project-by-project basis to prevent nonconforming uses and structures with the potential to impact the City's scenic vistas. Additionally, development occurring within the MASP and UASP areas would be subject to the development standards and design guidelines identified in each specific plan. Compliance with *Citywide Design Guidelines and Sign Guidelines* would also further reduce impacts to scenic resources. Compliance with relevant GP 2025 policies, RMC and Specific Plan standards, and *Citywide Design Guidelines and Sign Guidelines* would ensure impacts to scenic vistas are less than significant. (DEIR pages 7-1 to 7-2)

Threshold: Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Finding: Less Than Significant Impact. (DEIR page 7-2)

Explanation: According to the California Department of Transportation Website, California Scenic Highway Mapping System, the City is not affected by a State Scenic Highway. However, the City includes several GP 2025-designated scenic parkways which could be affected by future development occurring in proximity. GP FPEIR Table 5.1-B identifies the following City-designated scenic parkways: Victoria Avenue; Magnolia Avenue/Market Street; University Avenue; Van Buren Boulevard; Riverwalk Parkway; La Sierra Avenue; Overlook Parkway; Canyon Crest Drive; and Arlington Avenue. Project-related impacts to City-designated scenic parkways would be reduced to less than significant through compliance with RMC, MASP, and UASP standards, and *Citywide Design Guidelines and Sign Guidelines*. (DEIR page 7-2)

Threshold: Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

Finding: Less Than Significant Impact. (DEIR pages 7-2 to 7-3)

Explanation: The Project Area includes a mixture of developed, partially developed, and vacant uses anticipated for future development; refer to DEIR Section 2.0, *Project Description*. Where development would occur on currently vacant, rural, or agricultural land uses, Project implementation would have the potential to alter the existing visual character or quality of these sites. However, compliance with GP 2025 policies (i.e., Policies OS-4.1 and OS-4.2) and RMC, MASP, and UASP standards, and Citywide Design Guidelines and Sign Guidelines would ensure Project impacts to visual character or quality are less than significant. (DEIR pages 7-2 to 7-3)

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

Finding: Less Than Significant Impact. (DEIR page 7-3)

Explanation: As discussed in DEIR Section 7.0, future development could introduce new sources of light or glare with the potential to adversely affect day or nighttime views in some areas. However, the City adheres to Riverside County Ordinance No. 655, which regulates nighttime lighting for areas within a 15-mile radius (Zone A) and a 45-mile radius (Zone B) of the Palomar Observatory. The City also requires all development which introduces light sources, or modifications to existing light sources, to incorporate shielding devices or other light pollution limiting design features (i.e., hoods or lumen restrictions); refer

to GP FPEIR Mitigation Measure AES-1. RMC Section 19.556, Lighting, and Section 19.590.070, Light and Glare, include standards intended to protect the City from adverse light and glare impacts. Compliance with County Ordinance No. 655 requirements, existing GP FPEIR Mitigation Measure AES-1, and RMC Section 19.556 and Section 19.590.070, would ensure the Project's impacts to light and glare are less than significant. (DEIR page 7-3)

B. AGRICULTURAL AND FORESTRY RESOURCES

1. Farmland Conversion

Threshold: Would the Project convert 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, to non-agricultural use?

Finding: No Impact. (DEIR page 7-3)

Explanation: As discussed in DEIR Section 7.0, none of the candidate sites are located on designated farmland or a County-designated agricultural preserve based on GP FPEIR Figure 5.2-1, *Designated Farmland*, and DEIR Exhibit 7-1, *County-Designated Agricultural Preserves*. Since none of the candidate sites involve designated Farmland, no conversion of Farmland to non-agricultural use would occur. Further, GP 2025 incorporates various objectives intended to discourage the conversion of agricultural land uses and minimize impacts to agricultural resources. For example, future development must demonstrate conformance with GP 2025 Objective OS-4 policies, which act to preserve designated buffers between urban and rural uses for their open space and aesthetic benefits (i.e., Policies OS-4.1 and OS-4.2). Refer to DEIR Appendix E, *Relevant General Plan 2025 Policies* for the full text of these policies. Compliance with GP 2025 Objective OS-4 policies would ensure no impact in this regard. (DEIR page 7-3)

2. Agricultural Zoning

Threshold: Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Finding: No Impact. (DEIR page 7-5)

Explanation: As indicated in DEIR Appendix D and DEIR Table 2-2, the Project would have no impact concerning agricultural zoning or Williamson Act contract lands, as none of the candidate sites are zoned for agricultural use. Compliance with the GP 2025 Objective OS-4 policies would further minimize impacts in this regard. Refer also to the discussion concerning "Farmland Conversion" above.

3. Forestland Zoning and Loss of Forest Land

Threshold: Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Finding: No Impact. (DEIR page 7-5)

Explanation: As indicated in DEIR Appendix D and DEIR Table 2.2, none of the candidate sites are zoned for forest land. Additionally, there are no lands zoned as forest land, timberland, or timberland zoned Timberland Production areas (as defined in the PRC 12220(g) and PRC 4526 or Government Code

51104(g)) within the City's Planning Area. Therefore, the Project would not impact forest land or Timberland. (DEIR page 7-5)

Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No Impact. (DEIR page 7-5)

Explanation: Refer to the responses above. The Project would not involve impacts to forest land. (DEIR page 7-5)

Threshold: Would the Project 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?

Finding: No impact. (DEIR page 7-5)

Explanation: Refer to the responses above. The Project would not involve impacts concerning the conversion of Farmland to non-agricultural use or forest land to non-forest use. (DEIR page 7-5)

C. AIR QUALITY

1. Odors

Threshold: Would the Project create objectionable odors affecting a substantial number of people?

Finding: Less Than Significant Impact. (DEIR pages 7-5 to 7-6)

Explanation: As discussed in DEIR Section 7.0, the Project's construction-related odors would be temporary in nature and would cease upon construction completion. Any construction-related impacts would be short-term and thus are considered less than significant. The proposed Project does not include any uses identified by the South Coast Air Quality Management District (SCAQMD) as being associated with odors. In addition, all future development would be subject to compliance with SCAQMD Rule 402, Nuisance, which would reduce odorous emissions from associated with operations, if any. As such, operational impacts related to odors would be less than significant.

D. BIOLOGICAL RESOURCES

1. Interfere with the Movement of Migratory Species

Threshold: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Finding: Less Than Significant Impact. (DEIR pages 4.2-39 to 4.2-40)

Explanation: As described in DEIR Impact 4.2-1 "Special-Status Plant and Wildlife Species," only one candidate site is located within and Western Riverside County Multiple Species Habitat Conservation Plan (WRC MSHCP) Criteria Cell; refer to DEIR Exhibit 4.2-1, *MSHCP Criteria Cells, Cores, and Linkages*. Candidate Site W3G4S27 lies within MSHCP Criteria Cell 621, which contributes to Existing Core A; refer to DEIR page 4.2-39 to 4.2-40 for a description of the goals of Existing Core A. Future development occurring within this candidate site would could potentially represent new barriers to wildlife movement.

As such, future development occurring within Candidate Site W3G4S27 would be subject to compliance with the WRC MSHCP conservation requirements for Criteria Cell 621 to reduce impacts to wildlife movement. Following Candidate Site W3G4S27 compliance with the conservation requirements for Criteria Cell 621, as well as any other applicable WRC MSHCP requirements and conformance with the GP 2025 policies identified on DEIR page 4.2-40, impacts related to native resident or migratory wildlife corridors would be less than significant. (DEIR pages 4.2-39 to 4.2-40)

2. Local Policies or Ordinances

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

Finding: Less Than Significant Impact. (DEIR pages 4.2-40 to 4.2-41)

Explanation: Project implementation would be subject to conformance with all local policies and ordinances in place to protect biological resources, including Riverside County Ordinances 633.10 and 810.2, and RMC Chapter 16.72, *Western Riverside Multiple Habitat Conservation Plan Fee Program*. Separate from the WRC MSHCP consistency review, Candidate Sites W4G3S13 and W4G4S36 would be located within the boundary established by the County of Riverside in 1990 for protecting Stephens' kangaroo rat (*Dipodomys stephensi*), a federally-listed species that is also covered under the WRC MSHCP; refer to DEIR Exhibit 4.2-2, *Stephens' Kangaroo Rat Survey/Fee Area*. In addition, any future development proposing to plant or remove a tree within City right-of-way would be subject to conformance with the City's Urban Forestry Policy Manual, which includes guidelines for the planting, pruning, preservation, and removal of trees. Impacts would be less than significant in this regard. (DEIR page 4.2-41)

F. GEOLOGY AND SOILS

1. Geology-Related Hazards

Threshold: Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

Finding: Less Than Significant Impact. (DEIR pages 7-6 to 7-8.)

Explanation: As discussed in DEIR Section 7.0, the candidate sites (and City) are not affected by an Alquist-Priolo Earthquake Fault Zone. However, the City is located within a Southern California area that is affected by several active fault lines, including those associated with the San Jacinto and Elsinore Fault Zones; refer to GP FPEIR Figure 5.6-2, *Faults and Fault Zones*. As depicted on DEIR Exhibit 7-2, *Active Faults*, Candidate Site W1G4S44 is traversed by an unnamed active fault. Thus, this future development (i.e., Candidate Site W1G4S44) could be subjected to substantial adverse effects involving rupture of a known earthquake fault. Future development on Candidate Site W1G4S44 (as well as all other future development) must demonstrate conformance with GP 2025 Objective PS-1 policies, which would act to minimize the potential damage to new structures and loss of life that may result from geologic and seismic hazards (i.e., Policies PS-1.1 through PS-1-4). Future development subject to discretionary review (not by right uses) must also demonstrate conformance with GP 2025 Policy PS-9.8, which acts to reduce the risk to the community from hazards related to geologic conditions and seismic activity by requiring feasible mitigation of such impacts on discretionary development projects. Refer to DEIR Appendix E for the full text of these policies. All future development activities would be subject to compliance with the seismic

design guidelines and requirements contained in the California Building Standards Code (CBSC), which is adopted by RMC Chapter 16.08, *Building Code*. Compliance with GP 2025 policies, and RMC and CBSC requirements, as well as required geologic investigations for candidate sites within proximity to a fault, would ensure potential impacts associated with exposure of people or structures to potential substantial adverse effects associated with rupture of a known earthquake fault are less than significant. (DEIR pages 7-6 to 7-8)

2. Strong Seismic Ground Shaking

Threshold: Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Finding: Less Than Significant Impact. (DEIR page 7-8)

Explanation: Refer to the "Geology-Related Hazards" section above. Several fault lines affiliated with the Elsinore and San Jacinto Fault Zones exist in the region and have the potential to cause strong seismic ground shaking in the Project area. Thus, future development could be subjected to substantial adverse effects involving strong seismic ground shaking. Compliance with GP 2025 policies (i.e. Policies PS-1.1 to PS-1.4 and PS-9.8), and RMC and CBSC requirements, as well as required geologic investigations for candidate sites within proximity to a fault, would ensure potential impacts associated with strong seismic ground shaking are less than significant. (DEIR page 7-8)

3. Liquefaction

Threshold: Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Finding: Less Than Significant Impact. (DEIR pages 7-8 to 7-10.)

Explanation: DEIR Exhibit 7-3, *Liquefaction Zones*, illustrates the Project areas susceptible to liquefaction and indicates a total of 38 candidate sites are located within areas of high to very high liquefaction potential. (DEIR page 7-9) Compliance with GP 2025 Objective PS-1 policies, which act to minimize the potential damage to existing and new structures and loss of life that may result from geologic and seismic hazards (i.e., Policies PS-1.1 through PS-1-4), Policy PS-9.8, which acts to reduce the risk to the community from hazards related to geologic conditions and seismic activity by requiring feasible mitigation of such impacts on discretionary development projects, and CBSC seismic design standards (adopted by reference in RMC Chapter 16.08), would reduce impacts associated with the exposure of people or structures to potential substantial adverse effects involving liquefaction to less than significant. Refer to DEIR Appendix E for the full text of these policies. (DEIR page 7-9 to 7-10)

4. Landslides

Threshold: Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Finding: Less Than Significant Impact. (DEIR pages 7-9 and 7-11)

Explanation: According to the California Geologic Survey, mapped landslide hazard areas are outside of the Project area and do not intersect with any of the candidate sites. According to GP FPEIR Section 5.6, *Geology and Soils*, areas of high susceptibility to seismically induced landslides and rockfalls correspond to steep slopes in excess of 30 percent. No candidate sites are proposed within areas involving slopes in

excess of 30 percent. Compliance with GP 2025 policies (i.e., Policies PS-1.1 through PS-1.4 and PS-9.8) and RMC standards would ensure impacts associated with the exposure of people or structures to potential substantial adverse effects involving seismic landslides are less than significant. (DEIR page 7-9 and 7-11)

5. Soil Erosion or Loss of Topsoil

Threshold: Would the Project result in substantial soil erosion or the loss of topsoil?

Finding: Less Than Significant Impact. (DEIR page 7-11)

Explanation: As discussed in DEIR Section 7.0, short-term erosion effects during the construction phase of future individual projects would be prevented through required grading permits and implementation of a Storm Water Pollution Prevention Plan (SWPPP) through compliance with the National Pollutant Discharge Elimination System (NPDES) program and the incorporation of best management practices (BMPs), as required, intended to reduce soil erosion. Specifically, future development must demonstrate conformance with RMC Title 17, *Grading*, standards. Pursuant to RMC Chapter 17.16, *Grading Permit Application Requirements*, future projects involving one or more acre of clearing, grading, or excavation, would be required to prepare and implement a SWPPP prior to issuance of a grading permit. Future development classified as "Priority Development Projects" pursuant to the Water Quality Management Plan for the Santa Ana Region of Riverside County would be required to develop a project- and site-specific Water Quality Management Plans (WQMP) to help reduce potential impacts to soil erosion. Compliance with GP 2025 policies and RMC standards, including but not limited to site-specific SWPPPs, BMPs, NPDES, and WQMP, as applicable, would ensure impacts related to soil erosion are less than significant. (DEIR page 7-11)

6. Unstable Geologic or Soil Units

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

Finding: Less Than Significant Impact. (DEIR page 7-14)

Explanation: Refer to "Liquefaction" and "Landslides" discussion above concerning the Project's potential liquefaction and landslide hazards. As depicted on DEIR Exhibit 7-4, *Areas Susceptible to Subsidence*, all candidate sites are susceptible to subsidence except for three (Candidate Sites W1G3S07, W5G4S10, and W6G4S34). Compliance with GP 2025 policies (i.e., Policies OS-2.3 and PS-1.1 through PS-1.4) and RMC Chapter 17.16 standards would ensure impacts related to unstable soil conditions are less than significant. (DEIR page 7-14)

7. Expansive Soil

Threshold: Would the Project 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?

Finding: No Impact. (DEIR pages 7-12 to 7-14)

Explanation: A review of GP FPEIR Figure 5.6-4, *Soils* and GP FPEIR Table 5.6-B, *Soil Types*, indicates future development could be located on expansive soil, creating potential risk to life or property. However, future development must comply with the soil hazard design guidelines and requirements contained in the CBSC, which is adopted by reference in RMC Chapter 16.08. Further, future development would require

a site-specific preliminary soils report prepared by a registered soils engineer pursuant to RMC Chapter 17.16. As concluded in DEIR Section 7.0, compliance with GP 2025 policies intended to avoid or minimize adverse impacts to people or structures associated with expansive soils, and RMC standards would ensure potential impacts concerning expansive soils are less than significant.

8. Septic Tanks or Alternative Wastewater Disposal Systems

Threshold: Would the Project 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?

Finding: Less Than Significant Impact. (DEIR page 7-14)

Explanation: According to GP FPEIR Section 4.10, most of the City and its Planning Area is served by public sewer infrastructure. Additionally, the candidate sites are located within urbanized areas supported by public sewer infrastructure. Pursuant to RMC Section 14.08.030, *Connection to Public Sewer Required*, new development is required to connect to the public sewer system when the property on which such house or structure is not more than 160 feet from the public sewer and the right-of-way (ROW) admits such connection, or if the house or structure is located within an area where the use of a septic tank poses a potential contamination risk to the City's drinking water wells in the area. It is further noted that multi-family developments would not be allowed on septic tanks, and most commercial uses would similarly not be allowed. Therefore, it is not anticipated that future development would require the use of septic tanks and a less than significant impact would occur in this regard. It is noted, GP FPEIR Mitigation Measure Geo 1 requires that a registered hydrologist and geotechnical or soils engineer review development proposing septic systems for the site's suitability for septic and its potential impact to groundwater resources. Any future developments requiring the use of septic tanks or alternative wastewater disposal systems would be subject to compliance with GP FPEIR Mitigation Measure Geo 1 to reduce impacts to less than significant. (DEIR page 7-14)

G. HAZARDS AND HAZARDOUS MATERIALS

1. Hazardous Materials Routine Use, Generation, Transport, or Disposal

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

Finding: Less Than Significant Impact. (DEIR pages 4.5-22 to 4.5-23)

Explanation: As discussed in DEIR Section 4.5, *Hazards and Hazardous Materials*, future development would include residential and non-residential uses. Residential uses are not typically associated with hazardous materials usage. It is anticipated that small quantities of hazardous materials would be routinely used, stored, and/or handled onsite during operations associated with some commercial uses. Typically, these uses require small quantities of flammable, hazardous, and/or toxic materials for operation and maintenance purposes. Such substances would also be used for landscape maintenance of private residential lawns/common areas.

Increased development accommodated through Project implementation would increase the routine transport, use, and storage of hazardous materials in the City and thus would increase the potential for accidental releases. To mitigate these effects, any future commercial use where the maximum quantity of a regulated substance exceeds the specified threshold quantity, would be required to register with the Riverside Fire Department (RFD), which serves as the City's Certified Union Program Agency (CUPA) and prepare a Risk Management Plan. It is anticipated that some future commercial uses would be

registered with the RFD, as small-quantity generators. All hazardous materials or chemicals used by future commercial uses must be registered with the RFD and would be routinely inspected to ensure that these materials are being stored, handled, and used in accordance with all applicable federal, State, and local standards and regulations, to reduce the potential for a hazardous materials incident. Hazardous materials transport to/from the respective commercial uses would also adhere to all applicable Caltrans protocols. In addition, future development would be subject to compliance with relevant GP 2025 policies to reduce the risk of hazardous materials exposure (i.e., GP 2025 Policies PS-3.1 through PS-3.4). Refer to DEIR Appendix E for the full text of these policies. Compliance with relevant GP 2025 policies, as well as RFD, County, Division of Occupational Safety and Health (OSHA), California Environmental Protection Agency (Cal EPA), and U.S. EPA requirements, would ensure impacts concerning hazardous materials routine use, generation, transport, or disposal are less than significant. (DEIR pages 4.5-22 to 4.5-23)

2. Wildfire Safety Hazard

Threshold: Would the Project 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?

Finding: Less Than Significant Impact. (DEIR pages 4.5-34 to 4.5-35)

Explanation: As depicted on DEIR Exhibit 4.5-2, *Fire Hazard Map*, no candidate sites would be in an area susceptible to wildland fires. However, Candidate Site W6G4S33 is located immediately north of Lake Hills and thus would be at risk to urban wildland interface-related wildfire hazards. According to DEIR Exhibit 4.5-2, Candidate Site W6G4S33 would be located adjacent to a "High" fire hazard area.

Additionally, according to the GP FPEIR, no part of the City is fully protected from fire danger. Structural and automobile fires represent the most common types of urban fire hazards in the City and can be caused by a variety of human, mechanical, and natural factors. Urban fires have the potential to spread to other structures or areas, particularly if not extinguished promptly. Proactive efforts, such as fire sprinkler systems, fire alarms, fire resistant roofing and construction methods, can collectively lessen the likelihood and reduce the severity of urban fires.

In coordination with the County of Riverside Fire Department and California Department of Forestry and Fire Protection, the RFD would evaluate future development proposals on a project-by-project basis to determine whether fuel protection plans, greenbelts, special access roads, non-combustible construction techniques, and/or other applicable fire prevention techniques would be necessary to reduce hazards associated with wildfire and urban fires. Future development activities would be subject to compliance with the CCR Title 24 Parts 2 and 9 – *Fire Codes* and California Public Resources Code Sections 4290-4299 and General Code Section 51178. The City would also enforce all existing laws and regulations pertaining to fire protection, including RMC Chapter 16.32, *Fire Prevention*, and Chapter 16.52, *Development Fees for Fire Stations*. With the payment of relevant development impact fees, and continued implementation of GP 2025 Policies PS-6.1 through PS-6.7 and PS-10.3, impacts from wildland fires would be less than significant. Refer to DEIR Appendix E for the full text of these policies. (DEIR pages 4.5-34 to 4.5-35)

3. Cortese Listed Sites

Threshold: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Finding: Less Than Significant Impact. (DEIR pages 4.5-15 to 4.5-16 and 7-14)

Explanation: None of the candidate sites are located on Cortese-listed sites having land use restrictions, and none are identified in the California Department of Toxic Substances Control (DTSC) EnviroStor database; therefore, Project implementation would not create a significant hazard to the public or the environment in this regard. Notwithstanding, through the design review process, the City would evaluate all future individual development proposals on a project-by-project basis to verify the development is not on a government-listed hazardous materials site. A less than significant impact would occur in this regard. (DEIR pages 4.5-15 to 4.5-16 and 7-14)

4. Private Airstrip Hazards

Threshold: 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?

Finding: No Impact. (DEIR pages 7-14 to 7-15)

Explanation: According to the GP 2025 Public Safety Element, there are no private airstrips within the City or its Sphere of Influence. Therefore, the Project would not result in a safety hazard for people residing or working in the project area. Refer to DEIR Section 4.5, for detailed discussions concerning Riverside Municipal Airport, March Air Reserve Base, and Flabob Airport. (DEIR pages 7-14 to 7-15)

5. Emergency Plans

Threshold: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

Finding: Less Than Significant Impact. (DEIR page 7-15)

Explanation: The City has developed an extensive Emergency Operations Plan (EOP), created by the Emergency Management Office. The RFD promotes a high level of multi-jurisdictional cooperation and communication for emergency planning and response management through activation of a Standardized Emergency Management System program (SEMS). In compliance with the Disaster Mitigation Act of 2000, the City coordinated with the County of Riverside to prepare the *Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan* in June 2012. The Plan identifies existing hazards within the County (including the City), estimates the likelihood of future hazards, and sets goals to mitigate potential hazards to reduce or eliminate long-term risk to people and property from natural or manmade hazards. With continued use of SEMS and *Riverside County Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan*, and implementation of the City's GP 2025 policies enforcing compliance with the EOP (i.e., Policies PS-9.1, PS-9.3, PS-9.5, PS-9.7, PS-9.8, and PS-10.3 through PS-10.9), the Project would result in less than significant impacts concerning emergency response plans. Refer to DEIR Appendix E for the full text of these policies.

H. HYDROLOGY AND WATER QUALITY

1. Water Quality Standards

Threshold: Would the Project violate any water quality standards or waste discharge requirements?

Finding: Less Than Significant Impact. (DEIR pages 7-15 to 7-17)

Explanation: The Project's construction-related impacts would be reduced to less than significant levels through conformance with NPDES requirements, the *Santa Ana Regional Water Quality Control Board* (RWQCB) *Basin Plan*, applicable GP 2025 policies (i.e., OS-10.6 to OS-10.11), and RMC Title 17. Refer to DEIR Appendix E for the full text of these policies. Future development must also implement BMPs identified in the *Water Quality Control Plan* (Basin Plan) for the Santa Ana River Basin and Santa Ana RWQCB NPDES Permit No. CAF998001. RMC Title 17 specifies that all projects requiring a grading permit must submit all grading plans, including an interim erosion control plan, to the Public Works Director and Community & Economic Development Director. Future projects involving one or more acre of clearing, grading, or excavation, must prepare and implement a SWPPP prior to issuance of a grading permit; refer to RMC Chapter 17.16, *Grading Permit Application Requirements*. Compliance with the abovementioned federal, State, and local regulations would ensure construction-related activities associated with future development result in less than significant impacts to water quality. (DEIR page 7-16)

Concerning the Project's operational-related impacts, future development must demonstrate conformance with NPDES and RMC Title 17 requirements for protection of water quality. Project compliance with the local, State, and federal laws, ordinances, and requirements would ensure that Project operational activities would have a less than significant impact on water quality and would not significantly impact the beneficial uses of receiving waters. (DEIR pages 7-16 to 7-17)

2. Groundwater Supplies

Threshold: Would the Project 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)?

Finding: Less Than Significant Impact. (DEIR page 7-17)

Explanation: As described in DEIR Section 4.10, *Utilities and Service Systems*, Project implementation has the potential to increase groundwater demands based on its potential to support future development. As discussed in DEIR Section 4.10, the majority of the Project Planning Area receives water services from Riverside Public Utilities (RPU); however, southeast Riverside receives water services from Western Municipal Water District (Western). RPU's water supply portfolio is chiefly composed of groundwater supplies. Western's portfolio is largely dominated by imported or purchased supplies, and groundwater represented 21 percent of Western's total supply in 2015. RPU has indicated that Project implementation would result in an additional water demand of approximately 74 acre feet per year (AFY).[1] RPU has concluded that sufficient groundwater supplies are available to serve the Project as accounted for in their *2015 Urban Water Management Plan*. Therefore, Project implementation would not substantially deplete groundwater supplies and impacts would be less than significant.

RPU does not operate groundwater recharge facilities within the City's sphere of influence; refer to DEIR Exhibit 4.10-1, *Existing Water Facilities (RPU)*. Thus, Project implementation would have no impact concerning substantially interfering with groundwater recharge activities.

Impacts concerning groundwater supplies and groundwater recharge facilities would be less than significant in this regard. (DEIR page 7-17)

[1] Written Correspondence: Yamamoto, Blake, Utilities Senior Engineer, Riverside Public Utilities, April 27, 2017.

3. Erosion or Siltation

Threshold: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite?

Finding: Less Than Significant Impact. (DEIR pages 7-17 to 7-18)

Explanation: Impacts related to erosion or siltation would not be significant for future development occurring on partially or fully-developed candidate sites. Where development would occur on undeveloped properties, the potential for altering the existing drainage pattern of the site or area would exist.

Future development must demonstrate conformance with NPDES requirements and would be responsible for preparation of a project-specific SWPPP, which manages construction-related erosion and siltation impacts. Construction-related impacts would also be analyzed as part of a project-specific WQMP (as required) and through the Riverside Grading Permit process.

All new development projects under the RWQCB jurisdiction must adhere to the current Municipal Separate Storm Sewer Systems (MS4) permit requirements, as the entire area ultimately drains to the Santa Ana River, which is within Santa Ana RWQCB jurisdiction. Although a WQMP may not be required for each future project, each project would be responsible for the implementation of BMPs required to meet the current MS4 permit requirements. Post-construction impacts to erosion or siltation would be assessed and mitigated through site design and the City's MS4 permitting process.

In addition, future development must demonstrate conformance with GP 2025 Policies LU-5.1 through LU-5.6, OS-6.3, and OS-7.6, which are intended to protect the City's drainage courses. Refer to DEIR Appendix E for the full text of these policies. As such, impacts related to substantially altering the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on- or offsite would be less than significant.

4. Flooding

Threshold: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Finding: Less Than Significant Impact. (DEIR page 7-18)

Explanation: Refer to the "Erosion or Siltation" discussion above. Much of the City Planning Area is built-out and urbanized in character. The City requires development pads to be elevated above identified floodplains and Riverside County Flood Control and Water Conservation District (RCFCWCD) requires improvements to comply with their standards for flood control. Future development must implement BMPs identified in the project-specific SWPPP prior to the commencement of construction. Through conformance with City and RCFCWCD requirements, as well as implementation of project-specific BMPs, future development would not substantially alter the existing drainage pattern of the area, nor substantially increase the rate of surface runoff in a manner which would result in flooding on- or offsite. As such, less than significant impacts would occur. (DEIR page 7-18)

5. Stormwater Drainage Systems and Polluted Runoff

Threshold: Would the Project 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?

Finding: Less Than Significant Impact. (DEIR page 7-18)

Explanation: Refer to the "Water Quality Standards" and "Flooding" discussions above. Compliance with NPDES and City standards would ensure the amount of runoff water entering the City's stormwater drainage system resulting from future development is controlled. By law, all storm water discharges associated with future individual development projects that involve construction activity where clearing, grading, and excavation results in soil disturbance of at least one acre of total land area must comply with the provisions of this NPDES Permit, and develop and implement an effective SWPPAGES In addition, the City updated it Capital Improvements Program in August 2016 to identify critical City infrastructure programs, including improvements aimed at eliminating nuisance flows and providing additional flood protection. According to the City's Capital Improvement Program, storm drain improvements are prioritized to ensure installation of drainage improvements occurs concurrently with street improvement projects, in coordination with RCFCWCD projects, and in support of economic development projects. Capital improvements are funded out of the Storm Drain Fund, codified in RMC Section 16.08.050, which authorizes the City to collect storm drain fees with the issuance of building permits. Compliance with NPDES Requirements, RMC Section 16.08.050, and relevant GP 2025 policies (Policies PF-4.1 and PF-4.3) would ensure impacted related to polluted runoff would be less than significant. Refer to DEIR Appendix E for the full text of these policies. (DEIR pages 7-18 to 7-19).

6. Otherwise Degrade Water Quality

Threshold: Would the Project otherwise substantially degrade water quality?

Finding: Less Than Significant Impact. (DEIR page 7-19)

Explanation: Refer to the responses above. The Project would involve a less than significant impact concerning the substantial degradation of water quality. (DEIR page 7-19)

7. Flood Hazards

Threshold: Would the Project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map?

Finding: Less Than Significant Impact. (DEIR pages 7-19 to 7-21)

Explanation: According to DEIR Exhibit 7.5, Flood Hazard Areas, and DEIR Table 7-1, *FEMA Flood Zones*, the candidate sites are in in three FEMA Flood Zones: Flood Zone "X" (Unshaded); Flood Zone "X" (Other Flood Areas - Shaded); and Flood Zone "D." According to FEMA, a FEMA Flood Zone designation of Zone "X" (Other Flood Areas – Shaded) indicates an area of moderate flood hazard that has between a 1-percent and 0.2-percent chance of flooding within a given year. This is commonly described as the area subject to flooding between the 100-year/base flood and 500-year flood. A FEMA Flood Zone designation of Zone "X" (Unshaded) indicates an area of minimal flood hazard that is higher than the elevation of the 0.2-percent chance of flooding (or 500-year flood) within a given year. Thus, Future development on candidate sites within Zone "X" (Other Flood Areas - Shaded) or Zone "X" (Unshaded)

would not place housing within a 100-year flood hazard area, and a less than significant impact would occur in this regard.

It is noted that future development occurring on candidate sites within Zone "D" (i.e., Candidate Sites W4G3S13, W4G4S36, and W4G4S42) could place housing within a 100-year flood hazard area, since FEMA Flood Zone "D" indicates no analysis of flood hazards has been conducted in these areas and thus flood hazards are undetermined, but possible. Future development on Candidate Sites W4G3S13, W4G4S36, and W4G4S42 must conform to National Flood Insurance Rate Program and RMC Chapter 16.18, Flood Hazard Areas and Implementation of the National Flood Insurance Rate Program, requirements, which address potential flooding effects. RMC Chapter 16.18, *Flood Hazard Areas and Implementation of Natural Flood Insurance Program*, Section 16.18.050 requires new construction located within flood hazard areas to mitigate flood hazards by including on-site drainage, anchoring methods to prevent floating structures, elevating buildings above flood levels, and flood proofing, which requires buildings to be inspected and certified by a professional engineer, surveyor, or building inspector. Future development in Zone "D" would be conditioned to meet these requirements, including compliance with State Civil Code Section 1103 through 1103.4 requiring notification to those potentially affected of the risk involved in locating within a flood hazard or dam inundation area. Compliance with National Flood Insurance Rate Program, Natural Flood Insurance Program, and RMC Chapter 16.18 requirements would ensure potential impacts concerning flooding are reduced to less than significant. (DEIR pages 7-19 to 7-21)

Threshold: Would the Project place within a 100-year flood hazard area structures that would impede or redirect flood flows?

Finding: Less Than Significant Impact (DEIR pages 7-19 to 7-21)

Explanation: Refer to the response above. Compliance with National Flood Insurance Rate Program, Natural Flood Insurance Program, and RMC Chapter 16.18 requirements would ensure potential impacts concerning flooding are reduced to less than significant. (DEIR pages 7-19 to 7-21)

8. Dam or Levee Failure

Threshold: Would the Project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?

Finding: Less Than Significant Impact. (DEIR pages 7-21 to 7-22)

Explanation: As depicted on GP FPEIR Figure 5.8-2, *Flood Hazard Areas*, the City includes nine dams with dam inundation areas which could impact portions of the City. Thus, future development would expose people and structures to risk involving flooding as a result of dam failure. As concluded in the GP FPEIR, the State Division of Safety of Dams (DSOD) routinely inspects operating dams and would repair leaking or damaged dams to avoid the instantaneous dam failure depicted on GP FPEIR Figure 5.8-2. Future development must demonstrate conformance with GP 2025 Objective PS-2 policies, which are intended to guard against flooding and dam inundation hazards (i.e., PS-2.1 through PS-2.7). Refer to DEIR Appendix E for the full text of these policies. RMC Section 18.210.100, Flood Prone Lands and Drainage, and RMC Section 16.18.050 requires new construction located within flood hazard areas to mitigate flood hazards by including on-site drainage, anchoring methods to prevent floating structures, elevating buildings above flood levels, and flood proofing, which requires buildings to be inspected and certified by a professional engineer, surveyor, or building inspector. The proposed project would be conditioned to meet these requirements, including compliance with State Civil Code Section 1103 through 1103.4 requiring notification to those potentially affected of the risk involved in locating within a flood hazard or dam

inundation area. The City's continued implementation of their LHMP and future development's compliance with National Flood Insurance Rate Program requirements, Natural Flood Insurance Program, RMC Chapter 16.18, and GP 2025 Objective PS-2 policies would reduce potential impacts associated with exposure of people or structures to a significant risk involving flooding as a result of dam failure to less than significant. (DEIR page 7-21 to 7-22)

9. Inundation

Threshold: Would the Project result in exposure to inundation by seiche, tsunami, or mudflow?

Finding: No Impact. (DEIR page 7-22)

Explanation: The City of Riverside is located over 35 miles inland of the Pacific Ocean, thus, there would be no impact associated with exposure of people or structures to a significant risk involving tsunami.

According to the GP FPEIR, areas near the Santa Ana River, Lake Hills, Norco Hills, Box Springs Mountain Area, and the City's nine arroyos are capable of significant mudflows. The City has designated these areas as open space and recreational uses to minimize the effects of mudflow. As depicted on DEIR Exhibit 4.2-3, Riverside Arroyos, the only candidate sites located within proximity to an arroyo are Candidate Sites W1G4S02, W1G4S03, W1G4S04, W1G4S08, which are located approximately 0.05-mile west of the Tequesquite Arroyo. However, State Route 91 separates these candidate sites from the Tequesquite Arroyo.

Future development would not be in proximity to these areas, thus, there would be no impact associated with exposure of people or structures to a significant risk involving mudflow. Notwithstanding, future development must demonstrate conformance with GP 2025 policies concerning flooding and safety, and must meet all federal, State, and local building, seismic, water quality, flood, and drainage standards. As such, no impacts related to seiche, tsunami, or mudflow would occur with implementation of the Project. (DEIR page 7-32)

I. LAND USE AND PLANNING

1. Physically Divide an Established Community

Threshold: Would the Project physically divide an established community?

Finding: Less Than Significant Impact. (DEIR pages 4.6-24 to 4.6-25)

Explanation: Given Riverside's urbanized nature, the candidate sites are generally surrounded by existing development. Additionally, no major roadway (e.g., expressway or freeway), which would traverse an existing community or neighborhood is proposed. Therefore, Project implementation would not physically divide an established community. Further, as described in DEIR Section 2.0, Project buildout would achieve the City's goal to resolve inconsistencies between existing GP 2025 land use designations and zoning. The City reviews development proposals to verify compliance with RMC Title 19 and the most appropriate use of land, and to prevent nonconforming uses. Future development of candidate sites would also be subject to RMC Title 19 design requirements. As Project implementation would resolve inconsistencies between candidate sites' existing GP 2025 land use designations and zoning, Project implementation would not result in the physical division of an existing community and a less than significant impact would occur. (DEIR pages 4.6-24 to 4.6-25)

2. General Plan 2025 Land Use Plans, Policies, or Regulations

Threshold: Would the Project conflict with any applicable General Plan 2025 land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Less Than Significant Impact. (DEIR pages 4.6-29 to 4.6-30)

Explanation: As part of the Housing Element Update, the Project involves General Plan land use amendments to as many as 69 candidate sites, comprised of 303 parcels, and totaling approximately 395 acres. The GP land use amendments are proposed to change the candidate sites' land use designations to ensure consistency with the proposed Zoning Map amendments (refer to Impact 4.6-4) and accommodate DUs assigned to the RHNA. DEIR Table 2-6, *Proposed General Plan Land Use Designations*, provides descriptions of the proposed land use designations, which include HDR, VHDR, MU-U, and MU-V; refer also to Section 1.0 of this document for a description of these designations. DEIR Table 4.6-7 presents the candidate sites' development potential based upon the proposed land use designations and typical residential densities and non-residential intensities. As discussed under DEIR Impact 4.6-2, future development is anticipated to result in a net increase of as many as 8,243 DU and as much as 1.3 million SF of non-residential uses over current GP 2025 development potential; see also DEIR Table 4.6-3, *Candidate Sites Existing GP 2025 Development Potential* and Table 4.6-7, *Candidate Sites Proposed GP Development Potential*, and Section 5.3, *Growth-Inducing Impacts*. The updated Housing Element would serve as a comprehensive statement of City housing policy and a program of actions to support those policies. Additionally, the Project involves approval of General Plan Land Use Map Amendment (Planning Case No. P17-0096) to change the candidate sites' General Plan land use designations to ensure consistency with the proposed Zoning Map amendments and accommodate DUs assigned to the RHNA.

DEIR Table 4.6-2, *General Plan 2025 Consistency Analysis*, provides an analysis of Project consistency with relevant GP 2025 policies. As concluded in DEIR Table 4.6-2, the Project is consistent with the relevant GP 2025 policies and a less than significant impact would occur in this regard. (DEIR pages 4.6-28 to 4.6-29)

3. Habitat Conservation Plans

Threshold: Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan?

Finding: Less Than Significant Impact. (DEIR pages 4.6-35 to 4.6-36)

Explanation: As discussed in detail in DEIR Section 4.2.4, the Project would not adversely affect WRC MSHCP or *Stephens Kangaroo Rat Habitat Conservation Plan* implementation. Future development would be subject to compliance with the various WRC MSHCP provisions identified on DEIR page 4.6-35, as appropriate. Additionally, Candidate Site W3G4S27 would be subject to compliance with a Joint Project Review (JPR) with the Western Riverside County Regional Conservation Authority (RCA). Future development accommodated through Project implementation would also be subject to payment of mitigation fees in accordance with Riverside County Ordinance 633.10 and 810.2. Compliance with Riverside County Ordinance Number 633.10 and 810.2, as well as the GP 2025 policies identified on DEIR page 4.6-36, would ensure future development does not conflict with an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. Impacts would be less than significant. Refer also to DEIR Section 4.2, *Biological Resources*. (DEIR pages 4.6-35 to 4.6-36)

J. MINERAL RESOURCES

1. Known and Locally Important Resources

Threshold: Would the Project 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?

Finding: Less Than Significant Impact. (DEIR pages 7-22 to 7-23)

Explanation: As stated in GP FPEIR Section 5.10, *Mineral Resources*, areas classified MRZ-2 and MRZ-4 are in the Planning Area; see also GP FPEIR Figure 5.10-1, *Mineral Resources*. However, there are no active mines located within the City of Riverside. Review of GP FPEIR Figure 5.10-1 indicates that all candidate sites would be located within MRZ-4 areas where there is not enough information available to determine the presence or absence of mineral deposits. Project implementation is not anticipated to result in the loss of availability of a known mineral resource that would be of value to the region and the State's residents given most of the candidate sites are fully improved and situated within urban areas. Additionally, the majority of the 125.7 acres of vacant sites were previously improved and are situated within urban areas. Therefore, less than significant impacts would occur in this regard. (DEIR pages 7-22 to 7-23)

Threshold: Would the Project 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?

Finding: Less Than Significant Impact. (DEIR page 7-23)

Explanation: Refer to the discussion above. Due to the City's existing conditions, Project implementation would not result in the loss of availability of a locally important mineral resource recovery site delineated on the GP 2025, a specific plan, or any other land use plan. Impacts would be less than significant. (DEIR page 7-23)

K. PUBLIC SERVICES AND RECREATION

1. Governmental Public Facilities

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection 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?

Finding: Less Than Significant Impact. (DEIR pages 4.8-18 to 4.8-19)

Explanation: Future development would increase demand for fire protection services over time. It is noted that Project buildout would occur incrementally through 2025, based on market conditions and other factors, such that fire protection facilities are not overburdened by substantially increased demands at any single point in time. However, the Project does not propose new or physically altered fire protection facilities, or create a demand for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. No impact would occur in this regard. Any future expansion of existing fire protection facilities, if required, would be subject to environmental review under CEQA requirements. Payment of development fees for fire stations (i.e., RMC Chapter 16.52), as required, and continued compliance with GP 2025 Policies PS-6.1 through PS-6.7, PS-6.9, PS-10.1, PS-10.3, PS-10.4, and LU-26.1 would ensure the increased demand for fire protection services associated with future

development would be met. Refer to DEIR Appendix E for the full text of these policies. Thus, the Project's impacts to fire protection services would be less than significant. (DEIR pages 4.8-18 to 4.8-19)

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection 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?

Finding: Less Than Significant Impact. (DEIR pages 4.8-19 to 4.8-20)

Explanation: Future development would increase demand for police protection services over time. It is noted that Project buildout would occur incrementally through 2025, based on market conditions and other factors, such that Riverside Police Department (RPD) facilities are not overburdened by substantially increased demands at any single point in time. However, the Project does not propose new or physically altered police protection facilities, or create a demand for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. No impact would occur in this regard. Any future expansion of existing police protection facilities, if required, would be subject to environmental review under CEQA requirements. Compliance with relevant GP 2025 policies (i.e., GP Policies PS-7.1 to PS-7.5, PS-8.1 to PS-8.5, PS-10.1, PS-10.3, and LU-26.1) would ensure adequate police protection services are available to serve future development. Refer to DEIR Appendix E for the full text of these policies. Thus, the Project's impacts to police protection services would be less than significant. (DEIR pages 4.8-19 to 4.8-20)

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for any of the public services?

Finding: Less Than Significant Impact. (DEIR pages 4.8-20 to 4.8-22)

Explanation: Future development would increase demand for school services over time; refer to DEIR Table 4.8-7, Estimated Student Generation. It is noted that Project buildout would occur incrementally through 2025, based on market conditions and other factors, such that Riverside Unified School District (RUSD) and Alvord Unified School District (AUSD) facilities are not overburdened by substantially increased demands at any single point in time. However, the Project does not propose new or physically altered school facilities, or create a demand for new or physically altered school facilities, the construction of which could cause significant environmental impacts. No impact would occur in this regard. Any future expansion of existing school facilities, if required, would be subject to environmental review under CEQA requirements. Payment of development fees for school facilities (i.e., RMC Chapter 16.56, *School Development Fee*), as required, and continued compliance with GP 2025 Policies ED-1.1 and ED-3.1 would ensure the increased demand for school services associated with future development would be met. Refer to DEIR Appendix E for the full text of these policies. Thus, the Project's impacts to school services would be less than significant. (DEIR pages 4.8-20 to 4.8-22)

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for any of the public services?

Finding: Less Than Significant Impact. (DEIR pages 4.8-22 to 4.8-23)

Explanation: Future development would increase demand for library services over time. It is noted that Project buildout would occur incrementally through 2025, based on market conditions and other factors, such that existing library facilities are not overburdened by substantially increased demands at any single point in time. However, the Project does not propose new or physically altered library facilities, or create a demand for new or physically altered library facilities, the construction of which could cause significant environmental impacts. No impact would occur in this regard. Any future expansion of existing library facilities, if required, would be subject to environmental review under CEQA requirements. Compliance with relevant GP 2025 policies (Policies ED-5.1 to 5.3, PF-8.3, and LU-26.1), and the City's continued collection of a parcel tax for libraries, would ensure adequate library facilities are available to serve future development. Refer to DEIR Appendix E for the full text of these policies. Thus, the Project's impacts to library facilities would be less than significant. (DEIR pages 4.8-22 to 4.8-23)

L. POPULATION AND HOUSING

1. Substantial Growth and Displacement

Threshold: Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes or businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Finding: Refer to DEIR page 7-23 and Section 4.6, *Findings Regarding Growth Inducing Impacts* of this document.

Explanation: Refer to DEIR page 7-23 and Section 4.6 of this document.

Threshold: Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Finding: Less Than Significant Impact. (DEIR pages 7-23 to 7-24)

Explanation: There are approximately 66 DU and approximately 1.33 million SF of non-residential land uses located on the candidate sites; see DEIR Section 2.0. These existing uses would be replaced by the future development (i.e., residential and mixed uses). Thus, future development occurring on the candidate sites would displace both housing and people. However, Project implementation would increase residential and mixed-use opportunities within the City by allowing higher densities/intensities than are currently permitted under existing zoning. Project implementation is anticipated to result in a net increase of as many as 11,649 DU and as much as 5.9 million SF of nonresidential uses over existing conditions. Project implementation would not necessitate construction of replacement housing elsewhere, and a less than significant impact would occur in this regard, given:

- The Project does not propose development, rather is intended to accommodate and encourage development of affordable housing; and both the projections and the time frame are based on theoretical conditions used to anticipate the full scope and extent of potential environmental impacts resulting from the anticipated future development. The projections do not consider factors that influence the timing of development, such as economic factors and market forces, among others. Proposals for individual projects would originate primarily from the private sector and occur incrementally over time, largely based on economic conditions, market demand, and other planning considerations. The Housing Element does not approve or otherwise commit the City to a specific project, construction plan, or timing. Any public sector/City proposals resulting in displacement must demonstrate conformance with California Government Code regulations concerning displacement, which specify the steps necessary to mitigate adverse impacts.

- Project implementation would result in the loss of 66 DU, however, these would be more than offset by the net increase of as many as 11,649 DU.

- Based on identified vacancy rates,[2] existing unemployment, and a net increase of as many as 11,649 DU, ample housing opportunities would be offered within the City and surrounding communities to meet the housing demands created by the 5.9 million SF of nonresidential uses. (DEIR pages 7-23 to 7-24)

Threshold: Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Finding: Less Than Significant Impact. (DEIR page 7-24)

Explanation: Refer to the discussion above. A less than significant impact would occur. (DEIR page 7-24)

M. TRANSPORTATION/TRAFFIC

1. Hazard Due to Design Features

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

Finding: Less Than Significant Impact. (DEIR pages 4.9-42 to 4.9-43)

Explanation: Future development would involve new residential and non-residential land uses that could require site-specific traffic/circulation improvements with potential to increase hazards due to a design feature. There are no site-specific project plans at this time, and site-specific details (e.g., site layouts, ingress/egress locations, land use types, and intensities) are presently unknown. However, future development would be evaluated to verify that the site plan is designed according to minimum City standards (e.g., RMC Sections 19.710.040 and 19.710.050, among others), once details such as site layouts, ingress and egress locations, land use types, and intensities become known. Following compliance with City standards, impacts concerning site-specific traffic/circulation improvements with potential to increase hazards due to a design feature would be reduced to less than significant.

Circulation system improvements are required for various roadway segments, as discussed in detail under DEIR Impact 4.9-1. The functional and cross sections classifications are shown in GP 2025 Figure CCM-2, *Standard Roadway Cross Section*. All future circulation system improvements must confirm to these roadway standards. The City would continue to implement its adopted roadway standards, as well as the State of California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code standards. Thus, improved roadways would be designed to avoid hazards associated with design features. In addition, future development would be subject to several GP 2025 policies (i.e., Policies CCM-1.1, CCM-1.2, CCM-1.3, CCM-1.4, and CCM-7.1) intended to ensure the Project would not substantially increase hazards due to a design feature (i.e., circulation system improvement). Refer to DEIR Appendix E for the full text of these policies.

[2] As of January 2017, the U.S. Department of Housing and Urban Development (HUD) identifies a 2.1 percent sales housing market vacancy rate and 5.6 percent rental housing market vacancy rate for Riverside and its surrounding communities. See HUD's Comprehensive Housing Market Analysis for Riverside-San Bernardino-Ontario, California.

Concerning incompatible uses, the Project anticipates the development of approximately 7.2 million SF non-residential uses in the MU-U and MU-V zones, which are addressed in RMC Chapter 19.120, *Mixed-Use Zones (MU-N, MU-V, MU-U)*. According to RMC Section 19.120.010, the mixed-use zones are established to encourage a mixture of compatible and synergistic land uses, such as residential with compatible non-residential uses including office, retail, personal services, public spaces and other community amenities. The permitted uses in these zones are detailed in RMC Section 19.120.020, Permitted Land Uses, and the standards are specified in RMC Section 19.120.060, Development Standards, and RMC Section 19.120.070, Design Standards and Guidelines. Compliance with RMC Chapter 19.120 standards would ensure the Project would not substantially increase hazards due to incompatible land uses.

Therefore, to the extent that potential impacts can be evaluated commensurate with the details presently known, the Project would not substantially increase hazards due to a design feature or incompatible uses. A less than significant impact would occur in this regard. (DEIR pages 4.9-42 to 4.9-43)

2. Emergency Access

Threshold: Would the Project result in inadequate emergency access?

Finding: Less Than Significant Impact. (DEIR pages 4.9-43 to 4.9-44)

Explanation: Future development would be subject to review through the City's design review process to verify compliance with all applicable Fire Code and Building Code requirements for construction and access, as well as the City's minimum site access standards. The City has adopted the International Fire Code, codified in RMC Section 16.32.020. Future development would be subject to the site planning and development standards codified in RMC Section 16.32.020 to ensure adequate emergency access. Also, the City would continue to ensure that each development has adequate emergency ingress and egress; see GP 2025 Policy PS-10.4. Further, the City and RFD would review any modifications to existing roadways to ensure that adequate emergency access, and ingress/egress locations are provided. Emergency response and evacuation procedures would continue to be coordinated through the City in consultation with the police and fire departments. Project implementation would result in a less than significant impact involving the provision of adequate emergency access. (DEIR pages 4.9-43 to 4.9-44)

N. UTILITIES AND SERVICE SYSTEMS

1. Wastewater Treatment Requirements

Threshold: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Finding: Less Than Significant Impact (DEIR pages 4.10-14 to 4.10-15)

Explanation: As described in DEIR Section 4.10.2, *Existing Environmental Setting*, the City's Regional Water Quality Control Plant (RWQCP) operations are subject to the waste discharge requirements for Order No. R8-2006-0009, NPDES Permit No. CA105350. Western's Western Riverside County Regional Wastewater Authority (WRCRWA) and Western Water Recycling Facility operations are subject to the waste discharge requirements for Order No. R8-2015-0013, NPDES Permit No. CA8000316, and Order No. R8-3002-0113, respectively.

Construction activities associated with future development are anticipated to involve demolition of existing structures, construction of new structures, and grading to create building pads and roadways. Other improvements could include, but are not limited to, building walls and fencing, adding signage and lighting,

providing landscaping, onsite utilities, and infrastructure improvements such as sewer, water and dry utilities to support/serve the Project. Should they require wastewater disposal, all construction activities would be subject to conformance with the waste discharge requirements in place for the RWQCP, WRCRWA, and Western Water Recycling Facility. Waste discharge requirements specify limits on the amount of pollutants that can be contained in each facility's discharge and are implemented to preserve, protect, and restore water quality. Less than significant impacts would occur in this regard.

Wastewater treatment services for the future development would be provided through RPU and Western under regulations enforced by the Santa Ana RWQCB. Future development would increase the existing wastewater treatment demands; however, the RWQCP, WRCRWA, and Western Water Recycling Facility would continue to be subject to compliance with their individual waste discharge requirements, which specify limits on the amount of pollutants that can be contained in each facility's discharge. Less than significant impacts would occur in this regard. (DEIR pages 4.10-14 to 4.10-15)

2. Stormwater Drainage Facilities

Threshold: Would the Project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Finding: Less Than Significant Impact. (DEIR pages 4.10-21 to 4.10-22)

Explanation: Construction activities related to the Project's stormwater drainage facilities would be subject to compliance with the local, State, and federal laws, ordinances, and regulations, which would ensure that impacts are reduced to less than significant. As applicable, the City would require development proposals to mitigate impacts to stormwater drainage facilities through compliance with RMC Chapter 18.220, Improvements. Additionally, to further ensure development conforms to NPDES regulations, future development would be subject to compliance with the BMP Design Criteria identified in the BMP Design Handbook. Compliance with NPDES regulations, RMC Chapter 18.220, as well as applicable GP 2025 policies (Policies PF-4.1 through PF-4.3), would ensure adequate stormwater drainage facilities are to serve the Project. Less than significant impacts would occur. (DEIR pages 4.10-21 to 4.10-22)

3. Water Supply

Threshold: Would the Project have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?

Finding: Less Than Significant Impact. (DEIR pages 4.10-22 to 4.10-24)

Explanation: As elaborated on DEIR page 4.10-22, RPU and Western have analyzed the future development to determine if sufficient water supplies are available to serve the Project from existing entitlements and resources. Both RPU and Western have determined that they have adequate supply accounted for in their respective UWMP to meet anticipated future development water demands.[3, 4] Thus, RPU and Western would have adequate water supplies from existing entitlements and operational impacts would be less than

[3] Written Correspondence: Riverside Public Utilities, Yamamoto, Blake, Utilities Senior Water Engineer, April 27, 2017.

[4] Western has confirmed that the Project area has been analyzed in its 2014 North Facilities Area Master Plan and the Project's proposed zone changes would not likely result in a significant effect on existing and proposed water supplies. However, Western would formally review future development proposals as plans are submitted to the district. All future development proposals would be subject to fees in effect at the time each site develops. Written Correspondence: Western Municipal Water District, Shaw, Ryan E., Deputy Director of Water Resources, May 17, 2017.

significant. Further, where applicable, in compliance with SB 221 and SB 610 requirements, future development would be required to demonstrate adequate water supply with a signed Water Availability Form or "Will-Serve" letter from RPU or Western. The City would enforce all existing laws and regulations pertaining to water conservation, and would continue to implement GP 2025 Policies PF-1.1 through PF-1.4, among others. Refer to DEIR Appendix E for the full text of these policies. (DEIR pages 4.10-22 to 4.10-24)

4. Solid Waste Compliance with Statutes and Regulations

Threshold: Would the Project comply with federal, State and local statutes and regulations related to solid waste?

Finding: Less Than Significant Impact. (DEIR page 4.10-26)

Explanation: All future construction activities would be required to demonstrate compliance with federal, State, and local statues and regulations for solid waste; refer also to DEIR Impact 4.10-7. In particular, construction would be required to comply with the 2016 (or most recent) Green Building Code, which includes design and construction measures to reduce construction-related waste through material conservation measures and other construction-related efficiency measures. Construction activities would also be subject to compliance with AB 939, described above. Construction activities would also be subject to the City's Source Reduction and Recycling Element (SRRE) requirements for diverting solid waste. Compliance with the 2016 (or most recent) Green Building Code, AB 939, and the City's SRRE requirements would ensure compliance with existing statutes and regulations related to solid waste. Impacts would be less than significant.

Operational activities associated with future development would also be subject to compliance with all relevant federal, State, and local statutes and regulations for solid waste, including AB 939 and the 2016 (or most recent) Green Building Code. The City would also review future development for its consistency with the City's SRRE, and would continue to implement GP 2025 Policy PF-5.1 to reduce the volume of solid waste entering regional landfills; refer to DEIR Appendix E for the full text of this policy. Operational impacts would be less than significant in this regard. (DEIR page 4.10-26)

4.2 Findings Regarding Less Than Significant Impacts After Incorporation of Mitigation

The City Council hereby finds that feasible mitigation measures have been identified in the EIR that would avoid or substantially lessen the following potentially significant environmental impacts to less than significant. The potentially significant impacts, and the mitigation measures that would reduce them to less than significant, are as follows:

A. BIOLOGICAL RESOURCES

1. Special-Status Plant and Wildlife Species

Threshold: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Finding: Less Than Significant With City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report (GP FPEIR) Mitigation. (DEIR pages 4.2-32 to 4.2-35)

Explanation: As discussed on DEIR page 4.2-32, future development would increase urbanization throughout the City with the potential to result in direct and indirect impacts to candidate, sensitive, or special-status species. Species of Special Concern and those placed on the California Department of Fish and Wildlife (CDFW) Watch List are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. Species of Special Concern may receive special attention during environmental review, but they are not afforded formal statutory protection. Species determined to have the potential to occur within the general vicinity are presented in DEIR Table 4.2-1, *Potentially Occurring Special-Status Biological Resources*. The Project's construction-related and operational impacts to special-status plant and wildlife species are identified below.

CONSTRUCTION-RELATED IMPACTS

Special-Status Plant Species. As presented in DEIR Table 4.2-1, based on habitat requirements, the Project area has the potential to support 27 special-status plant species. Of the 27 special-status plant species, there is one California Natural Diversity Database (CNDDB) record of a special-status plant species occurring within or adjacent to the candidate sites. San Diego ambrosia has the potential to occur within/adjacent to Candidate Site W7G4S35; refer to DEIR Exhibit 4.2-4, *CNDBB Results* and Appendix D. San Diego ambrosia (*Ambrosia pumila*), as well as 18 of the 27 special-status plant species identified in the CNDDB record search are covered under the WRC MSHCP. As described previously, the City is a Permittee under the WRC MSHCP and would collect development impact fees to contribute to the WRC MSHCP pursuant to RMC Chapter 16.72. MSHCP Section 6.0, *MSHCP Implementation Structure*, identifies the overall MSHCP implementation policies and structure, including the institutional arrangements among the various parties involved in MSHCP implementation; see DEIR page 4.2-4 for a discussion concerning the WRC MSCHP Section. Future development would be subject to compliance, as appropriate, with the various WRC MSHCP provisions, which are intended to address potential impacts to special status plant species, including the following among others: WRC MSHCP Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*; WRC MSHCP Section 6.1.3, *Protection of Narrow Endemic Plant Species*; WRC MSHCP Section 6.1.4, Guidelines Pertaining to the Urban/Wildlands Interface; and WRC MSHCP Section 6.3.2, *Additional Survey Needs and Procedures*. Refer to DEIR page 4.2-32 and 4.2-33 for an expanded discussion on these provisions.

Mitigation fee payment and compliance with MSHCP Section 6.0 requirements are intended to provide full mitigation under CEQA, National Environmental Policy Act (NEPA), the California Endangered Species Act (CESA), and Federal Endangered Species Act (FESA) for impacts to the MSHCP-covered species and habitats pursuant to agreements with the USFWS, the CDFW, and/or any other appropriate participating regulatory agencies and, as set forth in the MSHCPAGE For special-status plant species occurring in MSHCP-covered areas, with mitigation fee payment to the City and compliance with WRC MSHCP survey requirements where necessary along with any site specific proposed mitigation measure(s) resulting from future biological assessments, full mitigation in compliance with CEQA, NEPA, CESA, and FESA would be granted and impacts to candidate, sensitive, and special status plant species would be less than significant.

To address potential impacts to special-status plant species occurring in non-MSHCP areas, the DEIR incorporates GP FPEIR Mitigation Measure BIO-1. GP FPEIR Mitigation Measure BIO-1 requires future projects with the potential to adversely impact listed, candidate, or special-status species to prepare a site-specific habitat assessment. Compliance with GP FPEIR Mitigation Measure BIO-1, as revised, would ensure impacts to candidate, sensitive, and special-status plant species occurring in non-MSHCP areas are less than significant.

Special-Status Wildlife Species. As presented in DEIR Table 4.2-1, based on habitat requirements, the Project area has the potential to support 41 special-status wildlife species. Of the 41 special-status wildlife species, there is one CNDBB record of a special-status wildlife species occurring within or adjacent to the candidate sites. San Bernardino kangaroo rat (*Dipodomys merriami parvus*) has the potential to occur within Candidate Site W4G4S16; refer to DEIR Exhibit 4.2-4 and Appendix D. However, San Bernardino kangaroo rat, as well as 25 of the 41 special-status wildlife species identified in the CNDBB record search are covered under the WRC MSHCP. Future development would be subject to compliance, as appropriate, with the various WRC MSHCP provisions, which are intended to address potential impacts to special status wildlife species, including WRC MSHCP Sections 6.1.2, 6.1.4, and Section 6.3.2, among others. As discussed above, the City is a Permittee under the WRC MSHCP and would collect development impact fees to contribute to the WRC MSHCPAGE Mitigation fee payment and compliance with MSHCP Section 6.0 requirements are intended to provide full mitigation under CEQA, NEPA, CESA, and FESA for impacts to the MSHCP-covered species and habitats pursuant to agreements with the USFWS, the CDFW, and/or any other appropriate participating regulatory agencies and, as set forth in the MSHCPAGE Thus, for special-status wildlife species occurring in MSHCP-covered areas, with mitigation fee payment to the City and compliance with WRC MSHCP survey requirements where necessary along with site specific proposed mitigation measure(s) resulting from future biological assessments, full mitigation in compliance with CEQA, NEPA, CESA, and FESA would be granted and impacts to San Bernardino kangaroo rat and other special-status wildlife species would be less than significant.

To address potential impacts to special-status wildlife species occurring in non-MSHCP areas, compliance with GP FPEIR Mitigation Measure BIO-1 would be required for future development during the design review process. As previously noted, GP FPEIR Mitigation Measure BIO-1 requires future projects with the potential to adversely impact listed, candidate, or special-status species to prepare a site-specific habitat assessment. Compliance with GP FPEIR Mitigation Measure BIO-1, as revised would ensure impacts to special-status wildlife species occurring in non-MSHCP areas are less than significant with mitigation incorporated.

Special-Status Plant Communities. As presented in DEIR Table 4.2-1, based on habitat requirements, the Project area has the potential to support six special-status plant communities. None of the six special-status plant communities are covered under the WRC MSHCP. Of the six special-status plant communities, there is no CNDBB record of a special-status plant community occurring within or adjacent to the candidate sites. Notwithstanding, to address special-status plant communities occurring in non-MSHCP areas, GP FPEIR Mitigation Measure BIO-1 would be required for future development during the design review process. As previously noted, GP FPEIR Mitigation Measure BIO-1 requires future projects with the potential to adversely impact listed, candidate, or special-status species or habitats to prepare a site-specific habitat assessment. Compliance with GP FPEIR Mitigation Measure BIO-1, as revised, would ensure impacts to special-status plant communities occurring in non-MSHCP areas are less than significant with mitigation incorporated.

OPERATION-RELATED IMPACTS

Project buildout, over time, would reduce available live-in and foraging habitat for these species within the Project vicinity. However, the Project's potential impacts to sensitive species would typically occur during the construction phase. The City would ensure future development is designed and, where necessary, conserved or mitigated, to demonstrate consistency with the WRC MSHCP and would ensure payment of development impact fees contributing to the MSHCPAGE To address potential operational impacts occurring in non-MSHCP areas, the City would ensure future development has incorporated all applicable mitigation requirements identified during a site-specific biological resources assessment (GP FPEIR Mitigation Measure BIO-1), as needed. Impacts would be less than significant in this regard.

The following mitigation measures will be implemented:

GP FPEIR MM BIO-1 To reduce potential direct and indirect impacts to Federal Species of Concern, California Species of Special Concern, California Species Animals or plants listed on the lists one through four of the California Native Plant Society (CNPS) Inventory not covered under the MSHCP, a habitat assessment shall be prepared by a qualified biologist for projects located on undeveloped sites with potential to impact these species. The report shall specify mitigation to avoid or reduce potential impacts to less than significant.

- If the findings of the habitat assessment show no sensitive species or suitable habitat exists on site, then no additional surveys or mitigation measures are required.

- If the potential for sensitive species exists or suitable habitat exists on site, focused surveys or mitigation, if identified in the habitat assessment, shall be completed. Focused surveys conducted in the appropriate season for each species, as identified in the habitat assessment report, shall be conducted to determine presence/absence status.

- If no sensitive species are identified through focused surveys, then no additional surveys or mitigation measures are required.

- If sensitive species are found on site and are not avoided by project design, then additional mitigation measures as recommended by a qualified biologist shall be implemented to avoid or reduce impacts to less than significant.

2. Adverse Effect on Riparian of Sensitive Natural Communities

Threshold: Would the Project 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?

Finding: Less Than Significant With Mitigation Incorporated. (DEIR pages 4.2-35 to 4.2-37)

Explanation: As identified in DEIR Section 4.2.2, *Existing Environmental Setting*, the Planning Area supports six riparian vegetation communities including: arrundo/riparian forest, cismontane alkali marsh, riparian scrub, southern cottonwood/willow riparian, southern willow scrub, and lands immediately adjacent to water. As shown on DEIR Exhibit 4.2-1, only one Candidate Site (W3G4S27) is located within an MSHCP Criteria Cell (Criteria Cell 621). Conservation in Criteria Cell 621 focuses on lands expanding existing conserved wetland habitat along the Santa Ana River. According to the WRC MSHCP, Criteria Cell 621 contributes to the assembly of Existing Core A, which consists of Santa Ana River and Prado Basin. Existing Core A is constrained on all sides by existing urban development and agricultural use, and planned land uses surrounding the Core consist largely of high impact land uses such as city and community development. High quality riparian habitat within the Core and along the edges must be maintained for species such as southwestern willow flycatcher, yellow warbler, yellow-breasted chat, western yellow-billed cuckoo, among others listed in the MSHCP. Therefore, future development has the potential to directly and indirectly impact riparian habitat or other sensitive natural communities, if present.

Candidate Site W3G4S27 is currently vacant and is proposed for an HDR land use designation and R-3-1500 zoning; refer to DEIR Appendix D. Future development with the potential to impact riparian habitat or other sensitive natural communities within Candidate Site W3G4S27 would be subject to compliance with WRC MSHCP Section 6.1.2. WRC MSHCP Section 6.1.2 requires an assessment of a project's potentially significant effects on Covered Species occupying riparian/riverine areas and vernal pools. This assessment is independent from considerations given to waters of the U.S. and waters of the State under the CWA and the California Fish and Game Code. The WRC MSHCP requires that all riparian/riverine habitats be avoided. If they cannot be avoided, a Determination of Biologically Equivalent or Superior Preservation (DBESP) is required. It is noted that there are already conserved areas within the MSHCP area and projects within the MSHCP area would set aside lands for conservation.

Future development with potential to affect CDFW-jurisdictional riparian habitats and located outside of the MSHCP Conservation Area would require a jurisdictional assessment to determine if: 1) the project site supports CDFW-protected wetlands, and; 2) the project must initiate the CDFW permitting process (see proposed Mitigation Measure BIO-1). Future development with potential to affect CDFW-jurisdictional riparian habitats occurring in non-MSHCP areas must demonstrate conformance with proposed Mitigation Measure BIO-1; refer to proposed Mitigation Measure BIO-2 below. In addition, the City would continue to protect and preserve native plant communities, including riparian areas and vernal pools and other open space uses in compliance with GP 2025 Policies OS-5.4 and OS-6.3. Refer to DEIR Appendix E for the full text of these policies.

Thus, conformance with the WRC MSHCP, in addition to proposed Mitigation Measure BIO-1 and relevant GP 2025 policies, would ensure impacts to CDFW-protected wetlands are less than significant with mitigation incorporated.

The following mitigation measures will be implemented:

BIO-1 Prior to demolition, grading, or building permit approval of candidate sites located within areas that could impact riparian/riverine habitat or federally protected wetlands as defined by California Fish and Game Code 1600 et seq. and Clean Water Act Sections 401 and 404, a qualified biologist shall prepare an assessment. The assessment shall include, at a minimum, identification and mapping of any wetland or riparian/riverine resources present; evaluation of plant species composition; a soils analysis (where appropriate); avoidance and impacted wetland/riparian/ riverine areas; and applicable mitigation measure(s) to avoid or reduce impacts to these resources to less than significant.

BIO-2 Prior to demolition, grading, or building permit approval, the project proponent shall provide written notification to the Community & Economic Development Department that the alteration of any water course or wetland, located either onsite or on any required offsite improvement areas, complies with California Fish and Game Code and U.S. Army Corps of Engineers' review and approval per California Fish and Game Code Section 1600 et seq. and Clean Water Act Sections 401 and 404. Copies of the approval from the relevant agencies shall be submitted to the Community & Economic Development.

3. Federally Protected Wetlands

Threshold: Would the Project 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?

Finding: Less Than Significant With Mitigation Incorporated. (DEIR pages 4.2-37 to 4.2-38)

Explanation: As noted in the "Adverse Effect on Riparian of Sensitive Natural Communities" discussion above, the Planning Area supports the six riparian vegetation communities. Riparian habitat is greatly concentrated at the City's northern border which abuts the Santa Ana River. Any future development with potential to impact to federally protected wetlands would require Clean Water Act Section 404 Permit from the United States Army Corps of Engineers (USACE) prior to demolition, grading, or building permit approval. Any adverse effects to federally protected wetlands would be fully mitigated through compliance with the Section 404 regulatory process, as the USACE ensures no net loss of riparian habitat and preservation of biological function and value of any onsite jurisdictional features

As discussed previously, only Candidate Site W3G4S27 is proposed within MSHCP Criteria Cell 621; refer to DEIR Exhibit 4.2-1. In addition to Clean Water Act Section 404 compliance, development occurring within this site would be subject to compliance with WRC MSHCP Section 6.1.2, described under "Adverse Effect on Riparian of Sensitive Natural Communities" above. Development within Candidate Site W3G4S27 would also be subject to compliance with WRC MSHCP Section 6.1.4, Guidelines Pertaining to the Urban/Wildlands Interface, which outlines several measures intended to minimize edge effects between development proposals and the MSHCP Conservation Area.

All future development with potential to affect federally protected wetlands occurring in non-MSHCP areas would require a jurisdictional assessment to determine if: 1) the project site supports federally protected wetlands, and; 2) the project must initiate the U.S. Army Corps of Engineers Section 404 process (see proposed Mitigation Measure BIO-3). The City would require future development to demonstrate conformance with proposed Mitigation Measure BIO-3 during the City's design review process. In addition, the City would continue to protect and preserve native plant communities, including wetlands and other open space uses in compliance with GP 2025 Policies OS-1.1, OS-5.2 and OS-7.3. Refer to DEIR Appendix E for the full text of these policies. Thus, conformance with the WRC MSHCP, in addition to proposed Mitigation Measure BIO-3 and relevant GP 2025 policies, would ensure impacts to federally-protected wetlands are less than significant with mitigation incorporated. (DEIR pages 4.2-37 to 4.2-38)

Refer to Mitigation Measures BIO-1 and BIO-2 above. In addition, the following mitigation measures will be implemented:

BIO-3 Prior to demolition, grading, or building permit approval, an assessment/jurisdictional delineation by a qualified biologist shall be prepared and submitted to the Planning Division for review and approval, for candidate sites located within areas that could impact federally protected wetlands as defined by Clean Water Act Section 404. The assessment shall include, at a minimum, identification and mapping of any wetlands present; evaluation of plant species composition; a soils analysis (where appropriate); avoidance and impacted wetland areas; and applicable mitigation measure(s) for proposed impacts to wetlands. The project proponent shall provide written notification to the Community & Economic Development Department that the alteration of any water course or wetland, located either onsite or on any required offsite improvement areas, complies with the U.S. Army Corps of Engineers Section 404 Nationwide permitting requirements. Copies of any agreements along with the notification shall be submitted to the Community & Economic Development.

B. CULTURAL AND TRIBAL CULTURAL RESOURCES

1. Archaeological Resources

Threshold: Would the Project cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5?

Finding: Less Than Significant With GP FPEIR Mitigation and Specified Mitigation. (DEIR pages 4.3-37 to 4.3-43)

Explanation: DEIR Table 4.3-7, *Archaeological Resources Within 0.50-Mile Radius of the Candidate Sites*, summarizes the resources revealed through the records search and indicates three previously recorded prehistoric archaeological sites (P-33-2612, P-33-2614, and P-33-2615) are located 0.50 mile southeast of Candidate Site W5G3S08. Given the distance between these resources and Candidate Site W5G3S08, and since future development on Candidate Site W5G3S08 would occur within the site boundaries, future development is not anticipated to cause a substantial adverse change in the significance of P-33-2612, P-33-2614, and P-33-2615. A less than significant impact would occur in this regard.

The Project proposes both a general plan amendment and specific plan amendment. Therefore, in compliance with SB 18 requirements, the City initiated the Project's SB 18 consultation process on April 21, 2017. The City notified the appropriate tribes on the NAHC contact list providing opportunity to conduct consultations. Of the 35 tribes/individuals contacted, only one response was received. On May 6, 2017, the Gabrieleno Band of Mission Indians – Kizh Nation submitted their response declining consultation.

Due to the City's urbanized nature, most of the Project area has been impacted by past urban development. Therefore, there is a low potential for future development to encounter any intact, potentially significant subsurface archaeological resources, as defined in CEQA Guidelines Section 15064.5. However, if previously undiscovered archaeological resources are discovered during grading/other earth-moving activities associated with future development, a substantial adverse change in the significance of such a resource could occur. To address potential impacts to yet undiscovered archaeological resources, future development would be subject to compliance with RMC Title 20 as well as applicable GP 2025 policies (i.e., Policies HP-1.1 through HP-1.4, HP-1.7, HP-2.1, HP-2.2, HP-2.3, HP-3.2, HP-4.1, HP-4.2, HP-4.3, HP-5.1, HP-7.1, HP-7.2, HP-7.3). Refer to DEIR Appendix E for the full text of these policies.

To further reduce impacts to yet undiscovered archaeological resources, future development would be subject to compliance with GP FPEIR Mitigation Measure Cultural 1 through Cultural 6. GP FPEIR Mitigation Measure Cultural 1 requires areas slated for development or other ground disturbing activities to be surveyed for archaeological resources by qualified individuals who meet the Secretary of the Interior's Standards and Guidelines regarding archaeological activities and methods prior to the City's approval of project plans and consultation with appropriate Native American Tribes if finds are considered tribal cultural resources. GP FPEIR Mitigation Measure Cultural 2 requires, where feasible, that project plans be developed to avoid known archaeological resources and sites containing human remains. GP FPEIR Mitigation Measure Cultural 3 requires a series of mitigation measures to reduce impacts to archeological resources if avoidance and/or preservation in place of known prehistoric and historical archaeological resources and sites containing Native American human remains are not feasible management options. GP FPEIR Mitigation Measure Cultural 4 requires a series of mitigation measures to reduce project-related adverse impacts to previously undiscovered archaeological resources and sites containing Native American human remains. GP FPEIR Mitigation Measure Cultural 5 includes avoidance and preservation protocols for impacts to individual historic resources and City-designated Historic Districts. GP FPEIR Mitigation Measure Cultural 6 is intended to protect archaeological resources within undeveloped properties and for developed properties in the Magnolia Avenue Specific Plan (MASP) where the project application indicates the need for extensive excavation to a depth reaching native (i.e., previously undisturbed) soils. Potentially significant impacts to yet undiscovered archaeological resources would be reduced to less than significant following compliance with the specified GP 2025 policies, and GP FPEIR Mitigation Measure Cultural 1 through Cultural 6.

The following mitigation measures will be implemented:

GP FPEIR MM Cultural 1. Candidate sites with high archaeological sensitivity shall be surveyed for archaeological resources by qualified individuals who meet the Secretary of the Interior's Standards and Guidelines regarding archaeological activities and methods. If potentially significant prehistoric archaeological resources are encountered during the archaeological survey, these shall be analyzed/processed managed in accordance with State and City regulations.

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

GP FPEIR MM Cultural 3. In accordance with the law, avoidance and/or preservation in place of known prehistoric and historical archaeological resources and sites containing Native American human remains are not feasible management options, the following mitigation measures shall be initiated:

a. Prior to demolition, grading, or building permit approval for a project, a Phase II (i.e., test-level) Research Design shall be developed detailing how the archaeological resources investigation will be executed and providing specific research questions that will be addressed through the Phase II Testing Program. The Phase II Testing Program shall be designed to define site boundaries further and assess the structure, content, nature, and depth of subsurface cultural deposits and features. Emphasis shall also be placed on assessing site integrity, cultural significance and the site's potential to address regional archaeological research questions. These data shall be used for two purposes: to discuss culturally sensitive recovery options with the appropriate Tribe(s) if the resource is of Native American origins, and to address the California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP) eligibility for the cultural resource and make recommendations as to the suitability of the resource for listing on either Register. The Research Design shall include measures in compliance with the established regulatory framework to reduce impacts to less than significant. For sites determined ineligible for listing on either the CRHR or NRHP, execution of the Phase II Testing Program would suffice as the necessary level of data recovery and mitigation of project impacts to this resource.

b. A participant-observer from the appropriate Native American Band or Tribe shall be used during all archaeological excavations involving sites of Native American concern.

c. Prior to demolition, grading, or building permit approval, the City's consultant shall complete the Phase II Testing Program as specified in the Research Design. The results of this Program shall be presented in a technical report that follows the County of Riverside's Phase II Cultural Resources Testing & Evaluation Standard Scope of Work. The Phase II Report shall be submitted to the appropriate Tribe and the City's Cultural Heritage Board.

d. If the cultural resource is identified as being potentially eligible for either the CRHR or NRHP, a Phase III Data Recovery Program to mitigate project effects shall be initiated. The Data Recovery Treatment Plan detailing the Phase III Program objectives shall be developed, in consultation with the appropriate Tribe, and contain specific testable hypotheses pertinent to the Research Design and relative to the sites under study. The Phase III Data Recovery Treatment Plan shall be submitted to the City's Cultural Heritage Board and/or Cultural Heritage Board staff and the appropriate Tribe.

e. After Treatment Plan completion, the Phase III Data Recovery Program for affected, eligible sites shall be completed. Typically, a Phase III Data Recovery Program involves the excavation of a statistically

representative sample of the site to preserve those resource values that qualify the site as being eligible for listing on the CRHR or NRHP. A participant-observer from the appropriate Native American Band or Tribe shall be used during archaeological data-recovery excavations involving sites of Native American concern. At the Phase III Program's conclusion, a Phase III Data Recovery Report shall be prepared, following the County of Riverside's Outline for Archaeological Mitigation or Data Recovery. The Phase III Data Recovery Report shall be submitted to the appropriate Tribe and the City's Cultural Heritage Board.

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

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

GP FPEIR MM Cultural 4. The following mitigation measures shall be implemented to reduce project-related adverse impacts to archaeological resources and sites containing Native American human remains that may be inadvertently discovered during construction of projects proposed in the City's 2014-2021 Housing Element Update:

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

b. If buried archaeological resources are uncovered during construction, all work shall be halted in the discovery's vicinity until a registered professional archaeologist can visit the site of discovery and assess the archaeological resource's significance and origin. If the resource is determined to be of Native American origin or a potentially significant cultural resource, these shall be analyzed/processed in accordance with State and local regulations, which may include data recovery, retention in situ, or other appropriate treatment and mitigation depending on the resources discovered.

c. In the event of an accidental discovery of any human remains in a location other than a dedicated cemetery, the steps and procedures specified in Health and Safety Code 7050.5, CEQA Guidelines 15064.5(e), and Public Resources Code 5097.98 must be implemented. Specifically, in accordance with

Public Resources Code (PRC) Section 5097.98, the Riverside County Coroner must be notified within 24 hours of the discovery of potentially human remains. The Coroner will then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with PRC Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods within 48 hours of notification. Whenever the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or the landowner or his or her authorized representative rejects the MLD's recommendation and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

GP FPEIR MM Cultural 5. See above.

GP FPEIR MM Cultural 6. Any application for projects within the Magnolia Avenue Specific Plan (MASP) boundaries for all undeveloped properties and for developed properties where the project application indicates the need for extensive excavation to a depth reaching native (i.e., previously undisturbed) soils, as determined by a geological survey, shall require the following:

a. Evaluation of the site by a qualified archaeologist retained by the Project applicant(s), which would include at a minimum a records search, a Phase I walkover survey, and preparation of an archeological report containing the results of this evaluation and specifying the mitigation necessary to avoid or reduce impacts to less than significant, in accordance with State and local regulations. No further action is necessary unless the Phase I survey determines that a Phase II/III survey(s) are necessary. If a Phase II/III are necessary, the following conditions shall apply:

i. Prior to demolition, grading, or building permit approval, the project applicant shall retain an archaeological monitor to monitor all ground-disturbing activities to identify any unknown archaeological resources. Any newly discovered cultural resource deposits shall be subject to a cultural resources evaluation.

b. Prior to demolition, grading, or building permit approval, the project archaeologist shall file a pre-grading report with the City to document the proposed methodology for grading activity observation. Said methodology shall include the requirement for a qualified archaeological monitor to be present and to have the authority to stop and redirect grading activities. In accordance with the agreement required in (c) above, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation with the Tribe(s) in order to evaluate the significance of any archaeological resources discovered on the property. Tribal monitors shall be allowed to monitor all grading, excavation and groundbreaking activities and shall also have the authority to stop and redirect grading activities in consultation with the project archaeologist.

c. If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to the origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable timeframe. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant" (MLD). The MLD shall then

make recommendations and engage in consultations concerning treatment of the remains as provided in Public Resources Code 5097.98.

d. The landowner shall relinquish ownership of all cultural resources, including sacred items, burial goods and all archaeological artifacts that are found on the project to the MLD for proper treatment and disposition.

e. All sacred sites shall be avoided and preserved as the preferred mitigation.

f. If inadvertent discoveries of subsurface archaeological/cultural resources are discovered during grading, the Project applicant(s)/developer, the project archaeologist and the Tribe(s) shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. If the project applicant and the Tribe(s) cannot agree on the significance or the mitigation for such resources, these items will be presented to the City for decision. The City shall make the determination based on California Environmental Quality Act (CEQA) requirements with respect to archaeological resources and shall take into account the religious beliefs, customs and practices of the Tribe(s).

2. Paleontological Resources

Threshold: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less Than Significant With Mitigation. (DEIR pages 4.3-43 to 4.3-44)

Explanation: According to the GP FPEIR, the City includes several locations which support a variety of known paleontological resources. As described in DEIR Section 2.0, approximately 67 percent of the candidate sites are developed to varying degrees with residential and non-residential uses. The urbanized nature of these sites has inevitably reduced surface soil and shallow subsurface sediments for intact, potentially significant paleontological resources. Notwithstanding, if previously unknown paleontological resources are discovered during grading/other earth-moving activities associated with future development, a substantial adverse change in the significance of such a resource could occur.

To reduce potential impacts to previously unknown paleontological resources, proposed Mitigation Measure CUL-5 requires a qualified paleontologist to monitor construction activities if excavation activities include digging deeper than 10 feet below the ground surface. Additionally, future development involving ground disturbing activities with the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature would be required to demonstrate compliance with GP 2025 Policies HP-1.3 and HP-1.4. Pursuant to GP 2025 Policy HP-1.3, the City would protect sites of paleontological significance and ensure compliance with all applicable federal and State cultural resources protection and management laws in its planning and project review process. Pursuant to GP 2025 Policy HP-1.4, the City would protect natural resources including geological features in the planning and design review process and in park and open space planning. Refer to DEIR Appendix E for the full text of these policies. Compliance with proposed Mitigation Measure CUL-5, as well as GP 2025 Policies HP-1.3 and HP-1.4 would reduce potentially significant impacts related to paleontological resources and unique geologic features to less than significant.

The following mitigation measures will be implemented:

CUL-5 If excavation activities include digging deeper than 10 feet below the ground surface, a qualified paleontologist shall be contracted to monitor construction activities. If construction activities uncover potential paleontological (fossil) resources, construction would be temporarily halted

within 50 feet of the find until the resources' significance is determined by a qualified paleontologist. The paleontological monitor shall be equipped to salvage fossils as they are unearthed to avoid construction delays, and to remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates.

The paleontological monitors shall have stop-work authority to temporarily halt or divert equipment to allow removal of abundant or large specimens. The paleontologist shall identify and permanently preserve all recovered specimens and facilitate curation into an established, accredited, professional museum repository with permanent retrievable storage. The paleontologist shall have a written repository agreement prior to the initiation of recovery activities. The qualified paleontologist shall complete a report describing the methods and results of the monitoring and data recovery program that shall be submitted to the City.

3. Human Remains

Threshold: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Finding: Less Than Significant With Mitigation. (DEIR pages 4.3-44 to 4.3-45)

Explanation: According to the GP FPEIR, several past archaeological studies have revealed the presence of Native American human remains. Most finds have been associated with former residential village locations; however, isolated burials and cremations have been identified throughout the Planning Area. As discussed, approximately 67 percent of the candidate sites are developed to varying degrees with residential and non-residential uses. The urbanized nature of these sites has consequently reduced the potential for future development activities to uncover human remains. Notwithstanding, if previously unknown human remains are discovered during grading/other earth-moving activities associated with future development, a substantial adverse change in the significance of such a resource could occur.

If human remains are found, those remains would require proper treatment in accordance with applicable laws, including HSC Sections 7050.5-7055 and PRC Sections 5097.98 and 5097.99. HSC Sections 7050.5-7055 describe the general provisions for treatment of human remains. Specifically, HSC Section 7050.5 prescribes the requirements for the treatment of any human remains that are accidentally discovered during excavation of a site. HSC Section 7050.5 also requires that all activities cease immediately and a qualified archaeologist and Native American monitor be contacted immediately. As required by State law, the procedures set forth in PRC Section 5087.98 would be implemented, including evaluation by the County Coroner and notification of the Native American Heritage Commission. The Native American Heritage Commission would then designate the "Most Likely Descendent" of the unearthed human remains. If human remains are found during excavation, excavation would be halted near the find and any area that is reasonably suspected to overlay adjacent remains shall remain undisturbed until the County Coroner has investigated and appropriate recommendations have been made for the treatment and disposition of the remains. Compliance with the established regulatory framework (i.e., HSC Sections 7050.5-7055 and PRC Sections 5097.98 and 5097.99) would ensure potential impacts concerning human remains resulting from future development are reduced to less than significant.

Compliance with GP FPEIR Mitigation Measures Cultural 1 through Cultural 6 would further reduce potential impacts to a less than significant level. In addition to GP FPEIR Mitigation Measures Cultural 1 through Cultural 6, the GP 2025 Land Use, Public Services, and Historic Preservation Elements include several policies intended to guide development to reduce potential impacts to unknown human remains; refer to the GP 2025 policies identified for DEIR Impact 4.3-4 "Human Remains" and Appendix E. Following compliance with GP FPEIR Mitigation Measures Cultural 1 through Cultural 6, and GP 2025

policies, potentially significant impacts to human remains would be reduced to a less than significant level. (DEIR pages 4.3-44 to 4.3-45)

Refer to GP FPEIR Mitigation Measures Cultural 1 through Cultural 6 above.

4. Tribal Cultural Resources (PRC Section 5020.1(K) and PRC Section 5024.1)

Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? 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.

Finding: Less Than Significant With Mitigation. (DEIR pages 4.3-45 to 4.3-47)

Explanation: The City received AB 52 requests for consultation from the following California Native American tribes: Pechanga Band of Luiseño Indians; Cahuilla Band of Indians; Gabrieleno Band of Mission Indians – Kizh Nation; San Manuel Band of Mission Indians; Soboba Band of Luiseño Indians; Morongo Band of Mission Indians; Rincon Band of Luiseño Indians; Agua Caliente Band of Cahuilla Indians; and San Gabriel Band of Mission Indians.

The City of Riverside, acting as the Lead Agency, initiated consultation in accordance with AB 52 requirements on April 21, 2017. A total of four tribes responded to the notification, and indicated that tribal cultural resources have previously been found within the Project area. As a result, the City conducted consultation via conference call with representatives from the following tribes: Gabrieleno Band of Mission Indians – Kizh Nation; Agua Caliente Band of Cahuilla Indians; and Soboba Band of Luiseño Indians. Refer to DEIR pages 4.3-46 to 4.3-47 for an expanded discussion concerning the Project's AB 52 consultation.

No tribal cultural resources were identified during consultation. As such, pursuant to AB 52 requirements, future development would not result in potential impacts to tribal cultural resources. Further, as detailed under Impact 4.3-2, yet undiscovered archaeological resources could be discovered during grading/other earth-moving activities associated with future development. Should these yet undiscovered archaeological resources involve a tribal cultural resource, future development could cause a substantial adverse change in their significance. As elaborated in DEIR Impact 4.3-1 and Impact 4.3-2, potentially significant impacts to yet undiscovered archaeological resources would be reduced to less than significant following compliance with RMC Title 20, relevant GP 2025 policies (i.e., Policy HP-1.1, HP-1.2, HP-2.2, HP-4.1, HP-4.3, HP-7.1, HP-7.2, HP-7.4, LU-4.6, and PS-11.3), and GP FPEIR Mitigation Measures Cultural 1 through Cultural 6.

As discussed in DEIR Impact 4.3-1 and 4.3-2, Table 4.3-7 and Table 4.3-8, *Historical Resources Within/Adjacent to a Candidate Site*, summarize the resources revealed through the records search and indicates that several previously recorded EIC and City of Riverside-designated historic and archaeological resources are located within or adjacent to the boundaries of candidate sites. However, no historical or archaeological resources have been identified as a tribal cultural resource. Therefore, future development would not cause a substantial adverse change in the significance of a tribal cultural resource revealed through the records search, since none were identified.

Refer to GP FPEIR Mitigation Measures Cultural 1 through Cultural 6 above.

D. HAZARDS AND HAZARDOUS MATERIALS

1. Accidental Release of Hazardous Materials

Threshold: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Finding: Less Than Significant Impact With Mitigation. (DEIR pages 4.5-23 to 4.5-26)

Explanation: As explained in DEIR Impact 4.5-1, the routine operations associated with future development could create a significant hazard to the public or the environment through accidental conditions involving the release of hazardous materials into the environment. Future development could involve construction activities that require the use of heavy equipment that would require onsite maintenance and fueling, and associated use and/or transport of petrochemicals and related hazardous materials. All construction activities associated with future development would be subject to compliance with the regulations and standards in place for the storage, use, and disposal of hazardous materials as identified by the EPA, DTSC, and City, as well as proposed Mitigation Measures HAZ-1 through HAZ-4. The GP 2025 Public Safety Element identifies policies to reduce the risk of hazardous materials exposure. In particular, Policies PS-3.1 and PS-3.2 ensure hazardous materials are handled properly. Policy PS-3.3 encourages coordination between agencies to regulate disposal of hazardous materials. Policy PS-3.4 requires hazardous materials transportation risks to be reduced. Refer to DEIR Appendix E for the full text of these policies. Compliance with the standards, regulations, GP 2025 policies, and recommended mitigation would reduce construction-related impacts to less than significant.

The following mitigation measures will be implemented:

HAZ-1 Prior to any renovation or demolition or building permit approval, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector shall conduct an asbestos survey to determine the presence or absence of asbestos containing-materials (ACMs). If the asbestos survey reveals ACMs, asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403 prior to any activities that would disturb ACMs or create an airborne asbestos hazard.

HAZ-2 If paint is chemically or physically separated from building materials during structure demolition, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. If lead-based paint is found, abatement shall be completed by a qualified lead specialist prior to any activities that would create lead dust or fume hazard. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City Project Engineer.

HAZ-3 Prior to any renovation, or demolition, grading or building permit approval, a formal Phase I Environmental Site Assessment (ESA) shall be prepared for any vacant, commercial, and industrial properties involving hazardous materials or waste. The Phase I ESA shall be prepared in accordance with ASTM Standard Practice E 1527-05 or the Standards and Practices for All

Appropriate Inquiry (AAI), prior to any land acquisition, demolition, or construction activities. The Phase I ESA would identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified hazardous materials Environmental Professional with Phase II/site characterization experience prior to land acquisition, demolition, and/or construction. The Environmental Professional shall identify proper remedial activities, if necessary.

HAZ-4 If the contractor discovers unknown wastes or suspect materials during construction that are believed to involve hazardous waste or materials, the contractor shall:

- Immediately cease work in the suspected contaminant's vicinity, and remove workers and the public from the area;
- Notify the City's Project Engineer;
- Secure the area as directed by the Project Engineer; and
- Notify the implementing agency's Hazardous Waste/Materials Coordinator.

The Hazardous Waste/Materials Coordinator shall advise the responsible party of further actions that shall be taken, if required.

2. Hazardous Emissions or Materials Near Schools

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

Finding: Less Than Significant With Mitigation. (DEIR pages 4.5-26 to 4.5-28)

Explanation: As discussed in DEIR Section 4.8, *Public Services and Recreation*, multiple schools are located throughout the City. In particular, 65 candidate sites are located within 0.25 miles of a school facility; refer to DEIR Table 4.5-5, *Candidate Sites within 0.25 Mile of a School Facility*. Future construction activities accommodated through Project implementation could create a significant hazard to the public or the environment through accidental conditions involving the release of hazardous materials into the environment. Compliance with proposed Mitigation Measures HAZ-1 through HAZ-4 and GP 2025 Policies PS-3.1 through PS-3.5, as well as the established regulatory framework would reduce impacts related to the accidental release of hazardous materials during construction to less than significant level.

Residential and commercial uses typically do not require significant quantities of hazardous materials. Thus, Project implementation is not anticipated to emit hazardous emissions or handle significant amounts of hazardous materials within 0.25-mile of an existing school and operational impacts would be less than significant.

Refer to Mitigation Measures HAZ-1 through HAZ-4 above.

2. Public Airport Hazards

Threshold: 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?

Finding: Less Than Significant With Mitigation. (DEIR pages 4.5-28 to 4.5-33)

Explanation: Three public use airports are located within the City and its SOI: Riverside Municipal; March Air Reserve Base/Inland Port Airport (MARB/IPA); and Flabob. The Riverside County Airport Land Use Commission (RCALUC) designates zones of airport-influenced areas for Riverside County airports and proposes a series of policies and compatibility criteria to promote, where feasible, compatible aviation and surroundings. According to the RCALUC, the Riverside Municipal and Flabob Airports involve six "Airport Influence Areas." An Airport Influence Area is an area "in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses;" see March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP) Section 1.2.

RIVERSIDE MUNICIPAL AIRPORT

According to the GP FPEIR, the Riverside Airport Master Plan (RAMP) demonstrates the Riverside Municipal Airport's significance to the City and the region. The City uses the RAMP to guide development on the airport to ensure the airport's long-term viability and to reduce the risk of aircraft hazards.

Future development would result in new land uses within the RAMP Land Use Compatibility Zone for the Riverside Municipal Airport (RMA), which would result in increased potential safety hazards for people residing or working in the area. A total of 14 candidate sites are located within RMA Land Use Compatibility Zones (seven in Zond D and seven in Zone E), as illustrated on DEIR Exhibit 4.5-1, *Airport Safety and Compatibility Zones* and outlined in DEIR Table 4.5-6, *Candidate Sites within Riverside Municipal Airport Hazard Zones*.

As discussed on DEIR page 4.5-30, seven candidate sites would be located within the boundaries of RMA Zone D (i.e., Candidate Sites W3G4S09, W3G4S11, W3G4S27, W5G3S08, W5G4S06, W6G4S32, and W7G4S35). However, development occurring within RMA Zone D would comply with the Riverside County ALUCP Basic Compatibility Criteria for this zone as they would include a density greater than 5.0 DU/AC and less than 300 persons per acre. Notwithstanding, the Riverside County ALUC would evaluate future development occurring within RMA Zone D in accordance with Riverside County ALUCP Section R1, Riverside Municipal Airport, criteria and maps to ensure consistency and less than significant safety risks. Following RCALUC review, future development within Zone D would result in a less than significant safety hazard associated with RMP for people residing or working in the area.

As discussed on DEIR page 4.5-31, seven candidate sites would be located within the boundaries of RMA Zone E (i.e., Candidate Sites W3G4S15, W4G4S16, W5G1S13, W5G1S14, W5G4S10, W6G4S34, W6G4S41). These candidate sites would be subject to compliance with the Basic Compatibility Criteria for RMA Zone E outlined in DEIR Table 4.5-6. The RCALUC would evaluate future development occurring within RMA Zone E in accordance with Riverside County ALUCP Section R1 criteria and maps to ensure consistency and less than significant safety risks. Following RCALUC review, future development within Zone E would result in a less than significant safety hazard associated with RMP for people residing or working in the area. (DEIR page 4.5-29 to 4.5-31)

MARCH AIR RESERVE BASE/INLAND PORT AIRPORT

Future development would also result in new land uses within the *2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan*, which would result in increased safety hazards for people residing or working in the area. Two candidate sites are located within MARB/IPA Land Use Compatibility

Zone C2,[5] as illustrated on DEIR Exhibit 4.5-1, and outlined in DEIR Table 4.5-7, *Candidate Sites within MARB/IPA Hazard Zones*. Candidate Sites W4G3S13 and W4G4S36 would not meet the residential density criteria specified in DEIR Table 4.5-7, *Candidate Sites within MARB/IPA Hazard Zones*. Therefore, future development on these candidate sites would not comply with the 2014 March Air Reserve Base/Inland Port ALUCP Basic Compatibility Criteria. This would be considered a significant impact unless mitigated. According to the *2014 March Air Reserve Base Airport Land Use Compatibility Plan*, Zone C2 has a moderate to low risk level and includes distant (beyond five miles) portion of instrument arrival corridor or closed-circuit flight training activity corridors.

The RCALUC would evaluate future development occurring within MARB/IPA Zone C2 in accordance with the *2014 March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan* criteria and maps to ensure consistency and less than significant safety risks. To avoid potential impacts to MARB/IPA operations within Zone C2, proposed Mitigation Measure HAZ-5 requires that Candidate Sites W4G3S13 and W4G4S36 be excluded from the Project (i.e., Tool H-21). Following compliance with proposed Mitigation Measure HAZ-5, future development within Zone C2 would result in a less than significant safety hazard associated with MARB/IPA for people residing or working in the project area. (DEIR pages 4.5-32 to 4.5-33).

FLABOB AIRPORT

As depicted on DEIR Exhibit 4.5-1, no candidate sites are located within the Flabob Airport influence area. Therefore, potential hazards from Flabob Airport operations would be less than significant. (DEIR page 4.5-33)

The following mitigation measures will be implemented:

HAZ-5 Concurrent with the proposed Zoning Code Map Amendment (Planning Case No. P17-0180), and to avoid potential impacts to March Air Reserve Base/Inland Port Airport operations within Zone C2, Flight Corridor Zone, the following candidate sites shall be avoided through exclusion of these properties from the Project (i.e., Tool H-21, *Rezoning Program*):

- W4G3S13; and
- W4G4S36.

E. LAND USE AND PLANNING

1. Zoning Ordinance Land Use Plans, Policies, or Regulations

Threshold: Would the Project conflict with any applicable Zoning Ordinance land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Less Than Significant With Mitigation. (DEIR pages 4.6-30 to 4.6-35)

Explanation: The Project involves approval of a Zoning Code Map Amendment (Planning Case No. P17-0180) to change the candidate sites' base zones to either Mixed-Use Urban (MU-U), Mixed-Use Village (MU-V), High Density Residential – (R-3-1500), or Very High Density Residential (R-4), and remove overlay zones, including Neighborhood Commercial (NC), Building Stories (S), Residential Protection (RP), and Building Setbacks (X), where applicable, to accommodate DUs assigned to the RHNA. The

[5] Written Communication: Riverside County Airport Land Use Commission, Guerin, John J. G., Principal Planner, May 9, 2017.

Project also involves a Zoning Code Text Amendment (Planning Case No. P17-0182) to include Tools H-26, *Zoning Code Incentives*, H-47, *Senate Bill 2 - Supportive and Transitional Housing*, and H-53, *Single Room Occupancies*, and Specific Plan Amendment (Planning Case No. P17-0521) to amend the University Avenue Specific Plan to specify that the 2014-2021 Housing Element candidate sites shall be permitted by right.

The Project's proposed zone changes would be subject to compliance with RMC Section 19.810.030, which sets forth procedures for Zoning Code Text/Map Amendments. DEIR Table 2-7, *Proposed Zoning*, provides descriptions of the proposed candidate site zoning districts, and DEIR Exhibit 4.6-4, *Candidate Sites Proposed Zoning*, illustrates their locations. DEIR Table 4.6-8, *Candidate Sites Proposed Zoning Development Potential*, presents the candidate sites' development potential based upon the proposed zoning and typical residential densities and non-residential intensities. As indicated in Table 4.6-8, the candidate sites' proposed zoning development potential is approximately 11,715 DU and approximately 7.2 million SF of non-residential land uses. A comparison of DEIR Table 4.6-4 and Table 4.6-8 indicates that future development is anticipated to result in a net increase of as many as 10,613 DU and as much as 1.9 million SF of non-residential uses over current zoning development potential.

The Housing Element Housing Implementation Plan describes the housing programs from which the quantified objectives are derived, and which are intended to accommodate the City's remaining RHNA of 4,767 DU. The Housing Implementation Plan specifies the following key zoning actions, which are further described in DEIR Impact 4.6-4 "Zoning Ordinance Land Use Plans, Policies, or Regulations:"

- Tool H-21, Rezoning Program;
- Tool H-26, Zoning Code Incentives;
- Tool H-47, Supportive and Transitional Housing; and
- Tool H-53, Single Room Occupancies.

As discussed in DEIR Section 4.6, several properties include recently approved or pending development. As partially developed or entitled sites, staff anticipates that these properties would not be available for development of housing within the planning cycle, and therefore do not merit rezoning as part of the proposed Housing Element Rezoning Program. Additionally, because the development or entitlements are on land not zoned for higher density residential, the entitlements are not for higher density residential uses, and therefore a change in zoning to higher density residential would likely make the new developments non-conforming. Therefore, proposed Mitigation Measure LU-1 requires that the properties outlined above be excluded from the Project (i.e., Tool H-21) to ensure Project consistency with the RMC. Following compliance with proposed Mitigation Measure LU-1, the Project would result in a less than significant impact. (DEIR pages 4.6-30 to 4.6-35)

The Project also involves approval of the following entitlements:

- Zoning Code Map Amendment (Planning Case No. P17-0180) to change candidate sites' base zones to either Mixed-Use Urban (MU-U), Mixed-Use Village (MU-V), High Density Residential (R-3-1500), or Very High Density Residential (R-4), and remove overlay zones, including Neighborhood Commercial (NC), Building Stories (S), Residential Protection (RP), and Building Setbacks (X), where applicable, to accommodate DUs assigned to the RHNA.

- Zoning Code Text Amendment (Planning Case No. P17-0182) to include various amendments related to Tool H-26, Tool H-47, and Tool H-53.

- Specific Plan Amendment (Planning Case No. P17-0521) to amend the UASP to allow multiple-family residential by right for properties Zoned as MU-V and MU-U as proposed under the rezoning program.

Upon approval of the proposed zoning amendment described above, the candidate sites' GP land use designation and zoning would be consistent. Thus, the Project would not conflict with a zoning ordinance land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and a less than significant impact would occur in this regard.

The following mitigation measures will be implemented:

LU-1 Concurrent with the proposed Zoning Code Map Amendment (Planning Case No. P17-0180), and to avoid potential conflicts with the Riverside Municipal Code and partially developed or entitled sites, the following properties shall be avoided through exclusion of these candidate sites/properties from the Project (i.e., Tool H-21, Rezoning Program):

- W3G4S11 (entire site);
- W3G4S09 (entire site);
- W2G2S03 (entire site);
- W4G3S13 (entire site);
- W4G4S36 (entire site);
- W5G1S02 (partial, APN's 234080031, 234080032, 234091012, and 234091013 only);
- W5G1S11 (entire site);
- W5G1S19 (entire site);
- W6G4S17 (partial, APN 143040011 only);
- W6G4S20 (partial, APN's 143080026 and 143080032 only);
- W6G4S26 (entire site);
- W6G4S33 (entire site);
- W6G4S34 (entire site); and
- W6G4S41 (partial, APN's 145082036, 145161007, 145161004, and 145161008 only).

F. NOISE

1. Construction Noise Impacts

Threshold: Would the Project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Finding: Less Than Significant With Mitigation. (DEIR pages 4.7-13 to 4.7-16)

Explanation: DEIR Impact 4.7-1 includes an analysis of the Project's potential construction noise impacts. For each future development project, construction duration is assumed to be approximately 18 months, which is considered a reasonable/typical duration based on the candidate sites' sizes and development potential (ranging from 23 DU and 23,763 SF of non-residential to 744 DU and 878,720 SF of non-residential). Ground-borne noise and other types of construction-related noise impacts would typically occur during the initial site preparation, which can create the highest noise levels. Generally, site preparation has the shortest duration of all construction phases. Activities that occur during this phase

include earthmoving and soils compaction. High groundborne noise levels and other miscellaneous noise levels can be created by heavy-duty truck, backhoe, and other heavy-duty construction equipment operations.

Noise from construction activities is generated by two primary sources: (1) the noise related to active construction equipment; and, (2) the transport of workers and equipment to construction sites. These noise sources can be a nuisance to local residents and businesses or unbearable to sensitive receptors (i.e., residential, hospital, hotel/motel, schools, parks, and places of worship). The Federal Transit Administration (FTA) has compiled data regarding noise generating characteristics of specific types of construction equipment and typical construction activities. These data are presented in DEIR Table 4.7-6, *Construction Equipment Noise Emission Levels*. These noise levels would decrease rapidly with distance from the construction site at a rate of approximately 6 a-weighted decibels (dBA) per doubling distance.

Operating cycles for these types of construction equipment used may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Construction activities associated with future development accommodated through Project implementation would occur in incremental phases over time based on market demand, economic, and planning considerations. All construction activities associated with future development would be subject to compliance with RMC Title 7. According to RMC Section 7.35.020(G), noise sources associated with construction, repair, remodeling, or grading of any real property are exempt from the noise standards provided: a permit has been obtained from the City as required; and said activities do not take place between the hours of 7:00 PM and 7:00 AM on weekdays, between the hours of 5:00 PM and 8:00 AM on Saturdays, or at any time on Sunday or a federal holiday. GP 2025 Policy N-1.3 requires compliance with the Riverside Noise Ordinance (RMC Title 7) to ensure that noise emanating from construction activities and stationary noise sources (as well as from private developments/residences and special events) are minimized. Thus, compliance with RMC Title 7 (i.e., RMC Section 7.35.020) would ensure construction-related noise impacts are less than significant. Further implementation of Mitigation Measures NOI-1 and NOI-2 would ensure no impact would occur to adjacent noise-sensitive receptors. Compliance with proposed Mitigation Measure NOI-1 would minimize construction noise associated with future development through use of site-specific noise reduction features. Specifically, NOI-1 requires the use of the best available noise control techniques, as well as alternatives to pneumatic power tools. Proposed Mitigation Measure NOI-2 requires compliance with a list of measures to respond to and track complaints related to construction noise. With implementation of proposed Mitigation Measures NOI-1 and NOI-2, as well as compliance with RMC Section 7.35.020(G) requirements, short-term construction noise impacts would be reduced to less than significant. (DEIR pages 4.7-13 to 4.7-16)

The following mitigation measures will be implemented:

NOI-1 To reduce construction-related noise impacts, Project applicants shall require construction contractors to implement a site-specific Noise Reduction Program, which includes the following measures, ongoing through demolition, grading, and/or construction:

- Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds), wherever feasible.

- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electronically powered wherever possible to avoid noise associated

with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler shall be used (this muffler can lower noise levels from the exhaust by up to approximately 10 dBA). External jackets on the tools themselves shall be used where feasible (this can achieve an approximately 5.0-dBA reduction. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.

- Stationary construction-related noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and incorporate insulation barriers, or other measures to the extent feasible.

NOI-2 Prior to demolition, grading, or building permit approval, the project applicant shall submit to the Community & Economic Development Department a list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction. These measures shall include the following:

- A procedure and phone numbers for notifying the Community & Economic Development Department and Police Department (during regular construction hours and off-hours);

- A requirement for a sign to be posted on-site specifying the permitted construction days and hours and complaint procedures, and who to notify in the event of a problem. The sign shall also include a listing of both the City and construction contractor's telephone numbers (during regular construction hours and off-hours); and

- A requirement for a preconstruction meeting to be held with the job inspectors and general contractor/on-site Project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.

2. Vibration Impacts

Threshold: Would the Project expose persons to or generate excessive groundborne vibration or groundborne noise levels?

Finding: Less Than Significant With Mitigation. (DEIR pages 4.7-16 to 4.7-19)

Explanation: Construction activities can generate varying degrees of groundborne vibration, depending on the construction procedure and equipment used. Construction equipment operations would generate vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located near a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). Groundborne vibrations from construction activities rarely reach levels that damage structures.

The DEIR analyzed construction vibration impacts using FTA-published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inch/second) appears to be conservative even for sustained pile driving. Pile driving levels often exceed 0.2 inch/second at distances of 50 feet, and 0.5 inch/second at 25 feet without any apparent damage to buildings.

The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are

not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 25 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. Construction activities associated with future development have the potential to generate low levels of groundborne vibration. DEIR Table 4.7-7, *Typical Vibration Levels for Construction Equipment*, identifies various vibration velocity levels for various construction equipment types.

Groundborne vibration would attenuate with distance. The groundborne vibration generated during construction activities would primarily impact vibration sensitive land uses (i.e., non-engineered timber and masonry buildings) located adjacent to or within the vicinity of specific projects. The force of vibrations reaching an adjacent structure would depend upon several variables, including the activity generating the vibrations, the distance between the source and the existing structure, and the type of soil or pavement found between the two. Based upon the vibration velocity levels provided in DEIR Table 4.7-7, vibration velocities from typical heavy construction equipment operations that could be used during construction activities range from 0.003 to 0.089 inch-per-second PPV at 25 feet from the activity source (and up to 0.644 PPV if pile driving activities were to occur). Thus, vibration velocities from typical heavy construction equipment operations at 25 feet from the activity source would not exceed the 0.2 the inch/second threshold, except for pile driving activities. As also shown in Draft EOR Table 4.7-7, vibration velocities from pile driving activities at 50 feet from the activity source would exceed the 0.2 the inch/second threshold. Therefore, construction-related activities that involve pile driving and occur 50 feet from a vibration sensitive land use (non-engineered timber and masonry buildings) could exceed 0.2 the inch/second threshold, and expose persons or structures to, or generate excessive groundborne vibration or groundborne noise levels. It is noted, as discussed in detail in DEIR Section 4.3, *Cultural and Tribal Cultural Resources*, candidate sites are located adjacent to various cultural resources. Similarly, vibration velocities from pile driving activities at 50 feet from the activity source would exceed the 0.2 the inch/second threshold for cultural resources involving non-engineered timber and masonry buildings. To lessen potential vibration-related impacts to adjacent sensitive uses, proposed Mitigation Measure NOI-3 requires that the preexisting condition of all buildings within a 50-foot radius of proposed construction activities that involve pile driving be evaluated during a preconstruction survey, and that alternative methods be utilized. As discussed in DEIR Section 4.3, to lessen potential impacts to adjacent cultural resources, proposed Mitigation Measure CUL-2 requires a comprehensive Construction Protection Plan (CPP) that would provide adequate protection to the historic resources located within 50 feet of construction activities involving pile driving, pursuant to National Park Service recommendations for protecting a historic structure during adjacent construction. The CPP would require consultation between the stakeholders, documentation of the historic resource prior to demolition, grading, or building permit approval, implementation of protective measures on both the construction site and historic resource site, and regular monitoring. Mitigating the effects of vibrations on cultural resources would begin during the consultation process when acceptable levels can be set and alternative measures/processes (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers, non-displacement piles that are inserted in bored holes rather than driven, "jacking-in" or pressing the piles into the ground, and locating delivery entry/exit points farther from the historic site) are specified. Continual crack and vibration monitoring of cultural resources would be required as a warning system to prevent exceedances of previously established safe thresholds. Additionally, CUL-3 specifies contractor requirements and requires that protective measures developed through CUL-2 be included on construction documents. Compliance with proposed Mitigation Measures NOI-3, CUL-2, and CUL-3 would reduce the exposure of persons or structures to excessive groundborne vibration to less than significant.

Operational activities associated with the proposed Project are not anticipated to generate excessive groundborne vibration or groundborne noise. As the Project would facilitate the future construction of residential and commercial mixed uses, operational activities associated with these uses would not expose

persons or structures to, or generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant. (DEIR pages 4.7-16 to 4.7-19)

Refer to Mitigation Measures CUL-2 and CUL-3 above. In addition, the following mitigation measures will be implemented:

NOI-3 To avoid impacts to vibration sensitive land uses (i.e., non-engineered timber and masonry buildings) located within a 50-foot radius of pile driving activities, prior to demolition, grading, or building permit approval, the following measures shall be specified on the project plans and implemented during construction:

- Pile driving within a 50-foot radius of vibration sensitive land uses shall utilize alternative installation methods (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers) such that vibration velocities from the alternative construction activity would fall below the 0.2 the inch/second threshold.

- The preexisting condition of all vibration sensitive land uses within a 50-foot radius of proposed pile driving shall be documented during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by pile driving, if any. Fixtures and finishes susceptible to damage and within a 50-foot radius of pile driving shall be documented (photographically and in writing) prior to demolition, grading, or building permit approval. All damage shall be repaired/restored to its preexisting condition.

F. PUBLIC SERVICES AND RECREATION

1. Recreation

Threshold: 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?

Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Finding: Less Than Significant With GP FPEIR Mitigation. (DEIR pages 4.8-23 to 4.8-25)

Explanation: DEIR Section 4.8 includes an analysis of the Project's potential impacts to parks and recreational facilities. As discussed, future development would increase demand for parks and recreational facilities over time. Potential impacts would include placing greater demands and parkland and recreational facilities, potentially resulting in the need to provide new or expanded facilities to maintain an acceptable level of service. Additionally, future development would increase the use of existing parks and other recreational facilities, which could cause physical deterioration of the facility. The City's existing parks and recreational facilities are presented in DEIR Table 4.8-5, *City of Riverside Parks and Open Space Types* and are illustrated on Exhibit 4.8-1, *Parks and Recreational Facilities*.

The Project does not propose construction of new or physically altered parks or recreational facilities. Therefore, the Project would not result in substantial environmental impacts in this regard. Future development could warrant construction of new or physically altered parks or recreational facilities depending upon its nature and timing. Any future expansion of existing facilities or construction of new facilities, if required, would be subject to environmental review under CEQA requirements.

It is noted that Project buildout would occur incrementally through 2025, based on market conditions and other factors, such that park and recreation facilities are not overburdened by substantially increased demands at any single point in time. As discussed above, the City has established the following parkland-to-population standards: 3.0 developed acres of parkland per 1,000 persons; 2.0 acres of Neighborhood Park per 1,000 persons; and 1.0 acre of Community Park per 1,000 persons. Based on these standards and the population growth associated with the Project (38,791 persons), the Project's parkland demands are as follows:

- Developed Parkland Demand: approximately 116 acres;
- Neighborhood Parkland Demand: approximately 78 acres; and
- Community Parkland Demand: approximately 39 acres.

As previously noted, the City currently maintains approximately 2,872 acres of parkland. Considering the City's current developed parkland demand of approximately 980 acres, there is an excess of approximately 1,892 acres, which would be sufficient to the meet the Project's developed parkland demand of approximately 116 acres. Notwithstanding, future development would be required to pay the parkland dedication fee or dedicate land in lieu of the fee, in accordance with RMC Chapter 16.60, Local Park Development Fees, and RMC Chapter 16.76, Trails Development Fee. RMC Chapter 16.60 establishes a local park development fee to provide funding for new or improved facilities meeting established standards for such development. Additionally, GP FPEIR Mitigation Measure REC-1 requires future development to provide developed parks or development fees prior to demolition, grading, or building permit approval. GP FPEIR Mitigation Measure REC-2 requires the City to re-evaluate Park Development Impact Fees annually, to ensure that the fees collected from new development appropriately pay for the development of required park acreage. Future development must also comply with GP 2025 policies pertaining to parks and recreational facilities, including the following: GP 2025 Policies CCM-8.1, CCM-8.2, CCM-10.1, CCM-10.2, CCM-10.4, CCM-10.5, CCM-10.7 through CCM-10.10, CCM-10.12, LU-26.1, PF-10.4, PR-1.1 through PR-1.5, PR-2.2 through PR-2.4, PR-2.6, PR-3.1, PR-3.3 through PR-3.5, OS-1.5, OS-1.8, OS-1.9, OS-1.11, Policy OS-7.1, and OS-7.4. Refer to DEIR Appendix E for the full text of these policies. Compliance with RMC Chapters 16.60 and 16.76, GP FPEIR Mitigation Measures REC-1 and REC-2, and the GP 2025 policies outlined above would ensure adequate parks and recreation facilities are available to serve the Project. Impacts would be less than significant with mitigation incorporated. (DEIR pages 4.8-23 to 4.8-25)

The following mitigation measures will be implemented:

GP FPEIR MM REC-1 Future development shall provide developed parks or pay applicable Park Development Impact Fees to the City of Riverside Parks, Recreation, and Community Services Department prior to demolition, grading, or building permit approval.

GP FPEIR MM REC-2 The City shall re-evaluate Park Development Impact Fees on an annual basis to ensure that the fees collected from new development appropriately pay for the development of required park acreage.

G. TRANSPORTATION AND TRAFFIC

1. Pedestrian, Bicycle, and Transit Facilities

Threshold: Would the Project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Finding: Less Than Significant With Mitigation. (DEIR pages 4.9-44 to 4.9-49)

Explanation: As discussed in DEIR Section 4.9, the City includes several Class I, II, III, and IV bikeways, which are identified in DEIR Table 4.9-2, *Bicycle Facility Classifications*. DEIR Exhibit 4.9-8, *Candidate Sites With Potential to Impact Bike/Transit Facilities*, illustrates candidate sites with potential to conflict with existing bikeways (and transit routes); see also Appendix D for a listing and description of the candidate sites. As indicated in DEIR pages 4.9-44 to 4.9-45, several candidate sites are located adjacent to existing and proposed bikeways. Given there are no site-specific project plans at this time, site details and ingress/egress locations are presently unknown. Absent such details, it is impractical through available traffic analysis procedures, to evaluate potential interruptions to existing bikeways. The City would evaluate all future individual development proposals with the potential impact bikeways on a project-by-project basis to identify facilities in the immediate area and ensure that future development does not conflict with existing or planned bikeways.

Additionally, as discussed under DEIR Impact 4.9-1, roadway improvements are proposed along existing and proposed bikeways. Therefore, future roadway improvements could temporarily interfere with existing and proposed bikeway facilities. However, existing or proposed bikeways along the roadway segments identified in DEIR Section 4.9 would be accounted for as part of the proposed improvements; see DEIR Mitigation Measure TRA-1. To further minimize potential impacts resulting from Project-related impacts to existing or planned pedestrian or bicycle facilities, all future development would be subject to compliance with GP 2025 Policies CCM-9.8, CCM-10.1, CCM-10.2, and CCM-10.10. Refer to DEIR Appendix E for the full text of these policies. Additionally, all future roadway improvements would be implemented according to the City's adopted standards for typical street sections and adopted Bicycle Master Plan. Therefore, Project implementation would result in less than significant impacts to existing and planned bikeway facilities following compliance with Mitigation Measure TRA-1 and GP 2025 Policies CCM-9.8, CCM-10.1, CCM-10.2, and CCM-10.10. (DEIR pages 4.9-44 to 4.9-48)

Future development would increase the City's population and employment generating uses and proportional increased demands for bicycle and pedestrian facilities. All future development would be subject to compliance with GP 2025 Policies CCM-9.8, CCM-10.1, CCM-10.2, and CCM-10.10, described in DEIR Appendix E, which would ensure the necessary bicycle and pedestrian facilities are provided commensurate with the demand created by future development. Therefore, impacts would be less than significant in this regard following compliance with GP 2025 Policies CCM-9.8, CCM-10.1, CCM-10.2, and CCM-10.10.

Public Transit

The Riverside Transit Agency (RTA) provides local and regional transit service for Riverside. Riverside's transit routes are shown on Draft Appendix J Figure 4-4 and summarized in the DEIR Section 4.9.2, *Existing Environmental Setting*. Riverside's train routes are also summarized in DEIR Section 4.9.2.

DEIR Exhibit 4.9-8 illustrates candidate sites with potential to conflict with existing transit routes; see DEIR Appendix D for a listing and description of the candidate sites. Therefore, future development could temporarily interfere with transit routes located adjacent to a candidate site. However, given there are no site-specific project plans at this time, site details and ingress/egress locations are presently unknown. Absent such details, it is impractical through available traffic analysis procedures, to evaluate potential interruptions to existing transit routes. The City would evaluate all future individual development proposals with the potential impact transit routes on a project-by-project basis to identify facilities in the immediate area and ensure that the project does not conflict with existing or planned transit routes.

As discussed under DEIR Impact 4.9-1, roadway improvements are proposed along several roadway segments where a transit route currently exists. Therefore, future roadway improvements could temporarily

interfere with existing transit facilities located adjacent to the candidate sites. However, existing transit routes located along the roadway segments outlined above would be accounted for as part of the proposed improvements; see Mitigation Measure TRA-1 below.

Further, future development would be subject to compliance with relevant GP 2025 policies intended to minimize impacts to existing transit routes (i.e., Policies CCM-9.2, CCM-9.5, and CCM-9.8). Refer to DEIR Appendix E for the full text of these policies. Thus, Project implementation would result in less than significant impacts to existing transit routes following compliance with Mitigation Measure TRA-1 and relevant GP 2025 policies.

Future development would increase the City's population and employment generating uses and proportional increased demands for public transit. Project implementation would include mixed uses, providing land use patterns that greatly influence traffic patterns and volumes. High-density mixed uses such as are proposed offer greater opportunity to take transit (or walk or combine shorter trips), than do spread out/low density uses that are separate from essential goods and services, resulting in increased number and length of trips. Further, all future development would be subject to compliance with GP 2025 Policies CCM-9.2, CCM 9.5, and CCM-9.8, as well as others identified for DEIR Impact 4.9-5, thereby ensuring potential impacts to the performance of transit systems (bus and commuter rail service) serving the City are less than significant. Overall, the City would encourage the use of bus and commuter rail service. (DEIR pages 4.9-44 to 4.9-49)

The following mitigation measures will be implemented:

TRA-1 Payment of Transportation Uniform Mitigation Fees (TUMF). To mitigate impacts to roadway levels of service and in accordance with RMC Chapter 16.68, Transportation Uniform Mitigation Fee, and specifically the provisions of RMC Section 16.68.060 concerning the procedures for the levy, collection, and disposition of fees, the project applicant shall pay the appropriate TUMF, to fund their proportionate fair share of the following roadway improvements:

Existing (2017) Plus Project Conditions

- #4 - Arlington Avenue (between Magnolia Avenue and SR-91 Southbound Ramps). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that exists along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.

- #28 - Van Buren Boulevard (between Rudicill Street and Mockingbird Canyon Road). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that is proposed along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.

- #29 - Van Buren Boulevard (between Mockingbird Canyon Road and Washington Street). Widened of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that is proposed along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.

- #30 - Van Buren Boulevard (between Washington Street and Wood Road). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement

shall account for the bikeway that exists along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.

- #33 - Van Buren Boulevard (between Limonite Avenue and Jurupa Avenue). Widening of this roadway from four to six lanes (two additional lanes, one in each direction).

Cumulative/Future (2040) Plus Project Conditions

- #28 - Van Buren Boulevard (between Rudicill Street and Mockingbird Canyon Road). See mitigation described above.

H. UTILITIES AND SERVICE SYSTEMS

1. Wastewater Generation and Facilities

Threshold: Would the Project require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Finding: Less Than Significant With City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report (GP FPEIR) Mitigation. (DEIR pages 4.10-15 to 4.10-18).

Explanation: DEIR Impact 4.10-2 analyzes the projects wastewater generation and its resultant impacts on existing wastewater conveyance and wastewater treatment facilities. As indicated on DEIR pages 4.10-15, based on correspondence with RPU, future development accommodated through Project implementation would generate an average of 2 MGD of wastewater and a peak wet weather flow of 6 MGD of wastewater.[6] Impacts to existing wastewater conveyance and treatment facilities are analyzed below.

Wastewater Conveyance. Depending on the existing wastewater flows and pipeline depth to diameter (d/D) ratios, future development could necessitate the construction of new or expanded wastewater conveyance facilities, the construction of which could cause significant environmental effects. Upgrades/expansions could include, but are not limited to, construction of new City sewer mains and laterals and upsizing of portions of City sewers.

Construction activities associated with wastewater conveyance upgrades/expansions would be subject to compliance with all federal, State, regional, and local requirements as well as any project-specific mitigation measures necessary to ensure construction-related impacts are not significant. In particular, future development would be required to uphold the goals and objectives of the City's Wastewater Collection and Treatment Facilities Integrated Master Plan (Integrated Master Plan), including its Capital Improvement Plan, to ensure the RWQCP continues to provide adequate wastewater treatment services concurrent with projected growth. Future development would also be subject to compliance with Western's design criteria and the Riverside Public Works Department's "Criteria for Sewer Facility Design," City Standard Drawings for Sewer Line Construction, Greenbook Standard Specifications for Public Works

[6] Estimates assume a net increase of 11,649 DU, average of 2.3 persons per DU, and annual wastewater generation of 75 gallons per person. Peak wet weather flow assumes a conservative peaking factor of 3.0 to account for daily fluctuations in wastewater generation; Source: Written Correspondence: Marquez Jr., Ernest PAGE, Principal Engineer, City of Riverside Public Works Department, August 1, 2017.

Construction (latest edition), and the most recently adopted edition of the Uniform Building Code. This framework establishes planning and design requirements for the sanitary sewer systems and includes considerations such as d/D ratios, minimum pipe size, system loading in gallons, and other data necessary for the design of sewers, lift stations, and other wastewater infrastructure. The City would also continue to coordinate with Western to ensure adequate wastewater conveyance.

Future development would also be subject to compliance with RMC Chapter 14.04, which establishes sewer service charges for new development, relevant GP 2025 policies (i.e., Policies PF-3.1 to PF-3.3), as well as existing GP FPEIR Mitigation Measure UTL-2. Refer to DEIR Appendix E for the full text of these policies. Compliance with GP 2025 policies, RMC standards, as well as GP FPEIR Mitigation Measure UTL-2 would ensure impacts associated with wastewater conveyance facilities are less than significant. (DEIR pages 4.10-15 to 4.10-16)

Wastewater Treatment Facilities. As described in DEIR Section 4.10.2, *Existing Environmental Setting*, the Project area generally receives wastewater treatment services from RPU at their RWQCP; however, areas south of Van Buren Boulevard receive wastewater treatment services from Western's WRCRWA or Western Water Recycling Facility. Wastewater treatment facilities are sized on accordance with adopted GP 2025 projections. When compared to GP 2025 projections (see DEIR Table 4.6-3 and Table 4.6-7), future development is anticipated to result in a net increase of as many as 8,243 DU and as much as 1.3 million SF of non-residential uses over current GP 2025 development potential. Thus, would exceed the land use projections assumed in sizing these wastewater treatment facilities. However, it is important to note that future development would occur incrementally through 2025, based on market conditions and other factors, such that wastewater treatment services are not overburdened by substantially increased demands at any single point in time. Further, the RWQCP has a design capacity of 46 mgd and currently processes an average flow of 27 mgd (or 59 percent capacity). The WRCRWA is expanding to achieve a design capacity of 14 mgd and currently processes an average flow of 8 mgd (or 57 percent capacity). The Western Water Recycling Facility has a design capacity of 3 mgd and currently processes an average flow of 0.8 mgd (or 25 percent capacity). Therefore, sufficient excess capacity exists at these wastewater treatment facilities. Notwithstanding, the City and Western would require future development to pay sewer connection fees as well as ongoing user fees, which would be used in part to defray the costs of any necessary facility upgrades. Payment of these fees, as well as compliance with RMC Chapter 14.04, relevant GP 2025 Policies (i.e., Policies OS-10.6, OS-10.7, PF-3.1 to PF-3.3, PF-4.2), and GP FPEIR Mitigation Measure UTIL-2, would reduce impacts associated with wastewater treatment facilities to less than significant. Refer to DEIR Appendix E for the full text of these policies. Construction of new wastewater treatment facilities or expansion of existing facilities would not be required; thus, no impact would occur in this regard. (DEIR page 4.10-17)

The following mitigation measures will be implemented:

GP FPEIR MM UTL-2 In order to mitigate potential impacts to adequate wastewater treatment plant capacity, the City will review population and development trends with respect to capacity of the treatment plant in 2020 to assure growth is occurring as expected under the Typical Project development scenario which can be accommodated with the present plant and planned expansions. If the review finds that development is outpacing what would be expected under the typical level, then mitigation and funding mechanisms shall be implemented to address expected capacity deficiencies. Options for mitigation could include, but are not limited to, such approaches as outlined below:

1. Upgrade the 52.5 mgd wastewater treatment plant to accommodate excess growth, or

2. Construct a new 40 mgd wastewater treatment plant. This plant could be funded by new development (General Plan Policy PF-3.2), or

3. Develop an agreement with WMWD to take on additional wastewater generated within the City's service area.

2. Water Demand and Facilities

Threshold: Would the Project require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Finding: Less Than Significant With City of Riverside General Plan and Supporting Documents Final Program Environmental Impact Report (GP FPEIR) Mitigation. (DEIR pages 4.10-18 to 4.10-21)

Explanation: As described previously, the Project area primarily receives water services from RPU; however, southeast Riverside receives water services from Western. Refer to DEIR Exhibit 4.10-1 for an illustration of RPU's existing water facilities. RPU has indicated that the Project's addition of 11,649 DU and 5.9 million SF of non-residential uses would create a water demand of 74 AFY.[7] However, it is important to note that future development would occur incrementally through 2025, based on market conditions and other factors, such that existing water services are not overburdened by substantially increased demands at any single point in time. As discussed above, future development satisfying certain criteria would require preparation of a WSA to verify sufficient water supply is available to meet the development's water demand. Future development would also be subject to compliance with relevant GP 2025 policies (Policies PF-1.1 to PF-1.4) as well as GP FPEIR Mitigation Measure UTIL-1. Refer to DEIR Appendix E for the full text of these policies.

If required, water facility construction activities associated with future development would be subject to compliance with the local, State, and federal laws, ordinances, and regulations, which would ensure that impacts would be reduced to less than significant. In particular, future development would be required to uphold the goals and objectives of the Riverside Capital Improvement Program, to ensure the adequate water treatment and distribution systems are planned for concurrent with projected growth. Future development would also be subject to compliance with Western's design criteria for water distribution systems or RPU's "Water Engineering Design Standards," and the most recently adopted edition of the Uniform Building Code. This framework establishes planning and design requirements for the water distribution systems. The City would also continue to coordinate with Western to ensure adequate water distribution. Compliance with the abovementioned existing regulatory framework would ensure adequate water facilities are available to serve the Project. Impacts would be less than significant with existing GP FPEIR mitigation. (DEIR pages 4.10-19 to 4.10-20).

The following mitigation measures will be implemented:

GP FPEIR MM UTL-1 In order to mitigate potential impacts related to the need for expanded entitlements for water supply if population growth exceeds Typical Project level, the City will review population and development trends with respect to water sources and supply in 2015 and 2020 to assure that growth is occurring as expected under the Typical Project development scenario which can be accommodated with present and expected water sources. If the review finds that development is outpacing what would be expected under the typical level, then mitigation and funding

[7] Written Correspondence: Riverside Public Utilities, Yamamoto, Blake, Utilities Senior Water Engineer, April 27, 2017.

mechanisms shall be implemented to address expected deficiencies. Options for mitigation could include, but are not limited to, such approaches as outlined below:

1. Acquire additional water from WMWD or other wholesale provider, or

2. Implement water conservation regulations to provide incentives and/or penalties to achieve necessary water conservation.

3. Solid Waste Capacity

Threshold: Would the Project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Finding: Less Than Significant With GP FPEIR Mitigation. (DEIR pages 4.10-24 to 4.10-25).

Explanation: Future development accommodated through Project implementation has the potential to increase solid waste disposal demands over existing conditions. All future construction activities would be required to demonstrate compliance with federal, State, and local statues and regulations for solid waste. Construction activities would be subject to compliance with the 50 percent diversion of solid waste requirement pursuant to the California Integrated Waste Management Act of 1989 (AB 939). In addition, construction activities would be required to comply with the 2016 (or most recent) Green Building Code, which implements design and construction measures that act to reduce construction-related waste though material conservation measures and other construction-related efficiency measures. Construction activities would also be subject to the City's SRRE requirements for diverting solid waste. Compliance with the 2016 (or most recent) Green Building Code, AB 939, and the City's SRRE requirements would ensure construction-related impacts to solid waste disposal are less than significant.

The future developments' anticipated construction-related solid waste generation at buildout conditions is an estimated 15,804 tons (or 31.6 million pounds).[8] According to the Riverside Department of Public Works Solid Waste Division, the Badlands Sanitary Landfill, El Sobrante Landfill, Lamb Canyon Sanitary Landfill, and/or Mid-Valley Landfill have adequate capacity to accommodate the Project's construction waste disposal needs.[9]

Based on California Emissions Estimator Model (CalEEMod) modeling results, Project buildout would generate a maximum flow of approximately 5,680 tons of waste per year (approximately 15.56 tons per day ((TPD)) of solid waste during operations. The Badlands Sanitary Landfill, El Sobrante Landfill, Lamb Canyon Sanitary Landfill, and Mid-Valley Landfill have a permitted maximum daily load of 4,800, 16,054, 5,500, and 7,500 TPD, respectively. For this reason, it is expected that the future developments' daily solid waste disposal needs could be accommodated at one or a combination of these facilities. Operational activities would be required to comply with all applicable federal, State, and local statues and regulations for solid waste, including those identified under the 2016 (or most recent) Green Building Code and AB 939, described above. Further, in compliance with GP 2025 Policy PF-5.1, future development would also be subject to compliance with GP FPEIR Mitigation Measure UTL-4. GP FPEIR Mitigation Measure UTL-4 requires the City to review the County Waste Management Annual Reports to California Integrated Waste Management Board every five years to ensure adequate capacity. If consultation with the CIWMB determines landfill capacity is becoming limited or exhausted, GP FPEIR Mitigation Measure UTL-4 requires the City to increase solid waste diversion efforts. Compliance with the 2016 (or most recent) Green

[8] Estimated construction debris at 4.39 pounds per square foot. Written Correspondence: City of Riverside Department of Public Works – Solid Waste Division, Washington, Archie, Field Operations Manager, May 5, 2017.
[9] Ibid.

Building Code, AB 939, and GP FPEIR Mitigation Measure UTIL-4 would ensure operational impacts to solid waste disposal are less than significant. (DEIR pages 4.10-24 to 4.10-25)

The following mitigation measures will be implemented:

GP FPEIR MM UTL-4 The City will review the County Waste Management Annual Reports to California Integrated Waste Management Board (CIWMB) every five years to ensure that projections still show adequate capacity to and through the year 2025. If levels show that landfill capacity is becoming limited or exhausted, then the City shall increase efforts to divert waste from landfills such as meeting Policy PF 5.1 which encourages innovative methods and strategies to reduce the amount of waste materials entering landfills, including achieving 100 percent recycling citywide for both residential and non-residential development.

4.3 Findings Regarding Significant and Unavoidable Impacts

The City Council hereby finds that, despite incorporation of Mitigation Measures identified in the EIR, the following impacts from the Project and related approvals cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

A. AIR QUALITY

1. Air Quality Plan Consistency

Threshold: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.1-13 to 4.1-16)

Explanation: Concerning the Project's air quality plan consistency, the DEIR analyzes the Project against SCAQMD's *CEQA Air Quality Handbook*. According to the *CEQA Air Quality Handbook*, two main criteria must be addressed:

CRITERION 1

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

a) Would the Project result in an increase in the frequency or severity of existing air quality violations?

Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of a project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating project consistency.

The Project is proposed to accommodate the City's remaining RHNA allocation of 4,767 DU, which would be accomplished through various key actions, including Tool H-21, *Rezoning Program*. Tool H-21 involves Zone Changes (as well as General Plan and Specific Plan

Amendments) to as many as 69 candidate sites, which would have a development potential of as many as 11,715 DU and as much as 7.2 million SF of non-residential uses. State law requires that the City accommodate their RHNA "fair share" of the region's housing needs, which cannot be achieved without the Project's proposed rezoning and the future development. As discussed below in Impact 4.1-2, the proposed Project would be subject to compliance with applicable SCAQMD impact significance thresholds/methodologies and emission reduction measures, which have been included as proposed Mitigation Measures AQ-1 through AQ-4. However, the Project's short-term construction emissions would exceed the SCAQMD's ROG emissions thresholds, long-term operational emissions would exceed SCAQMD's daily emissions thresholds for all criteria pollutants (ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$), and localized construction and operational pollutant concentrations would exceed SCAQMD localized significance thresholds (LSTs) for PM10 and PM2.5. Therefore, the proposed Project would result in an increase in the frequency or severity of the existing air quality violations for PM_{10}, $PM_{2.5}$, and SO_2 in the Basin. Because ROGs are not a criteria pollutant, there is no ambient standard or localized threshold for ROGs.

b) Would the project cause or contribute to new air quality violations?

As discussed under DEIR Impact 4.1-2, proposed Project operations would result in emissions that would exceed the SCAQMD operational thresholds for all criteria pollutants (ROG, NOx, CO, SO_X, PM_{10}, and $PM_{2.5}$). Therefore, the proposed Project would have the potential to cause or affect a violation of the ambient air quality standards.

c) Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

The proposed Project would result in significant impacts concerning localized concentrations during operations. As such, the proposed Project could delay the timely attainment of air quality standards or 2016 AQMP emissions reductions.

CRITERION 2

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that the Basin's air quality planning focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining Project consistency focuses on whether the proposed Project exceeds the assumptions utilized in preparing the forecasts presented in the 2016 AQMP. Determining whether a project exceeds the 2016 AQMP assumptions involves evaluation of the three criteria outlined below. The following discussion provides an analysis of each of these criteria.

a) Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?

In the case of the 2016 AQMP, three sources of data form the basis for projections of air pollutant emissions: the GP 2025; SCAG's Growth Management Chapter of the Regional Comprehensive Plan (RCP); and SCAG's RTP/SCS. The RTP/SCS also provides socioeconomic forecast projections of regional population growth.

The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local City plans and policies; these are used by SCAG in all phases of implementation and review. Additionally, the SCAQMD has incorporated these same projections

into the 2016 AQMP. As described in DEIR Section 2.0, Project buildout would achieve the City's goal to resolve inconsistencies between existing GP 2025 designations and zoning. The City implements its Zoning Code (RMC Title 19) to ensure development proposals are reviewed to ensure most appropriate use of land and prevent nonconforming uses. Although, Project implementation would improve inconsistencies between existing GP 2025 land use designations and zoning, the Project would amend the land use types, intensities, and patterns assumed in the GP 2025, and thus, in the RCP. The Project involves a General Plan Land Use Map Amendment (Planning Case No. P17-0096) to redesignate as many as 69 candidate sites to ensure consistency with the proposed Zoning Map amendments and accommodate DUs assigned to the RHNA, and Project implementation is anticipated to result in a net increase of as many as 8,155 DU and as much as 1.22 million SF of non-residential uses over GP 2025 projections. Thus, future development would cause SCAG projections to be exceeded; see also DEIR Section 5.3. As such, the Project would not meet this AQMP consistency criterion. It is however, noted, State law requires that the City accommodate their RHNA "fair share" of the region's housing needs, which cannot be achieved without the proposed rezoning and the future development.

b) Would the project implement all feasible air quality mitigation measures?

The proposed Project would be subject to compliance with applicable SCAQMD impact significance thresholds/methodologies and emission reduction measures, which have been included as proposed Mitigation Measures AQ-1 through AQ-4. As such, the proposed Project meets this AQMP consistency criterion.

c) Would the project be consistent with the land use planning strategies set forth in the AQMP?

As discussed above, the Project would exceed GP 2025 growth assumptions which have been incorporated into the 2016 AQMP projections. As such, it can be concluded that the Project would be inconsistent with the AQMP land use projections.

As concluded in DEIR Section 4.1, the determination of 2016 AQMP consistency is primarily concerned with the long-term influence of a project on air quality in the Basin. The Project would result in a long-term impact on the region's ability to meet State and Federal air quality standards. Further, the Project would conflict with the 2016 AQMP goals and policies. Implementation of proposed mitigation measures and compliance with SCAQMD rules would reduce conflicts and obstruction of the AQMP; however, the combined emissions from future development would exceed the SCAQMD significance thresholds for criteria pollutants. Exceeding these thresholds has the potential to hinder the region's compliance with each AQMP. Therefore, this impact is considered significant and unavoidable after implementation of mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.1-13 to 4.1-16)

Refer to DEIR Mitigation Measures AQ-1 through AQ-4 under "Short-Term Construction and Long-Term Operational Emissions" below.

2. Short-Term Construction and Long-Term Operational Emissions

Threshold: Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.1-16 to 4.1-23)

Explanation: DEIR Impact 4.2-2 discusses the Project's short-term construction and long-term operation emissions with the potential to violate air quality standards or contribute substantially to an existing or project air quality violation.

SHORT-TERM CONSTRUCTION EMISSIONS

Short-term air quality impacts are predicted to occur during grading and construction operations associated with future development. Temporary air emissions would result from the following activities:

- Particulate (fugitive dust) emissions from grading and building construction; and
- Exhaust emissions from the construction equipment and construction crew motor vehicles.

Construction activities associated with future development would occur in incremental phases over time based upon numerous factors, including market demand, and economic and planning considerations. Construction activities would consist of grading, demolition, excavation, cut-and-fill, paving, building construction, and application of architectural coatings. In addition, construction worker vehicle trips, building material deliveries, soil hauling, etc. would occur during construction. Construction-related emissions are typically site-specific and depend upon multiple variables. Quantifying individual future development's air emissions from short-term, temporary construction-related activities is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, construction schedules/duration, equipment requirements, etc., among other factors, which are presently unknown. Since these parameters can vary so widely (and individual project-related construction activities would occur over time dependent upon numerous factors), quantifying precise construction-related emissions and impacts would be impractical. Depending on how development proceeds, construction-related emissions associated with future development could exceed SCAQMD thresholds of significance. To provide a reference of the types of air quality emissions associated with representative individual construction activities, four hypothetical scenarios were modeled for different sizes of residential and commercial development anticipated by the Project. Modeling was conducted for construction of the following four residential and non-residential development scenarios:

- Mean: 169 DU and 102,640 SF of non-residential uses;
- 90th Percentile: 351 DU and 347,098 SF of non-residential uses;
- Maximum: 774 DU and 878,720 SF non-residential uses; and
- Exclusively Residential Maximum: 1,007 DU.

The construction emission estimates were based on a conservative assumption of a one-year construction duration, and the default construction equipment usage included in CalEEMod. It is also noted, these scenarios are considered a reasonable assumption of the development that could occur at any given time in the future. DEIR Table 4.1-4, *Typical Project Construction Emissions*, presents the estimated daily short-term construction emissions for the four hypothetical scenarios. For the four modeled scenarios in DEIR Table 4.1-4, emissions would result from onsite demolition, grading activities, transport of materials to and from the site, building construction, paving, and architectural coating associated with the individual developments.

The emissions in DEIR Table 4.1-4 incorporate compliance with SCAQMD Rule 403, which would reduce fugitive dust emissions generated at future construction sites by requiring dust abatement measures (proposed Mitigation Measure AQ-1). Rule 403 is required for all development projects and stipulates that excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures. In addition, SCAQMD Rule 402 is required for implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site and after implementation would reduce short-term fugitive dust impacts on nearby sensitive receptors. Future development would similarly be subject to compliance

with SCAQMD Rules 1113 and 1143 concerning architectural coatings and reducing VOCs in consumer paint thinners and multi-purpose solvents, respectively. DEIR Table 4.1-4 shows that the SCAQMD thresholds for ROG are exceeded under the maximum development scenario involving 774 DU and/or 878,720 SF of non-residential land uses. As such, future development exceeding the SCAQMD construction thresholds would be required to comply with proposed Mitigation Measure AQ-2, which requires the construction contractor to use ROG-reducing techniques, such as utilizing a high-pressure-low-volume (HPLV) paint applicators, and exceeding SCAQMD Rule 1113. A review of Appendix D, *Candidate Sites Table*, indicates that all 69 candidate sites would involve 774 DU or fewer and/or 878,720 SF or less non-residential floor area. Notwithstanding, compliance with Mitigation Measure AQ-2 is required to ensure ROG emissions would be below the SCAQMD construction thresholds. A future development with daily construction-related emissions below SCAQMD thresholds is considered to have a less than significant impact. If the mixed-use candidate sites were to develop exclusively as multiple-family residential (i.e., no non-residential land uses), based on allowable residential densities (see Appendix D), the largest single development would involve a maximum of 1,007 DU. Table 4.1-4 shows that SCAQMD construction thresholds would not be exceeded under such a development scenario. Therefore, such a scenario would result in a less than significant impact.

The SCAQMD has established methodology protocols for preparation of air quality assessments and GP 2025 Policy AQ-3.4 requires that projects mitigate, to the extent feasible, anticipated emissions, which exceed SCAQMD thresholds. Future development would also be subject to relevant GP 2025 policies intended to reduce construction-related impacts to air quality (i.e., Policy AQ-3.7, AQ-4.2, AQ-4.5, and AQ-4.6). Refer to DEIR Appendix E for the full text of these policies. Notably, the SCAQMD has adopted thresholds of significance specifying the approximate level of construction-related emissions that would result in a potentially significant impact (i.e., violation of an ambient air quality standard) for each Basin pollutant of concern (see DEIR Table 4.1-3, *SCAQMD Regional Pollutant Emission Thresholds of Significance*). The SCAQMD's significance thresholds would be relied upon to determine the significance level of a future project's construction-related impact. Additionally, the appropriate SCAQMD recommended Basin emissions modeling input parameters would be employed, among other procedures, to evaluate potential construction-related air quality impacts. Future project-level assessments of construction-related air quality impacts (see proposed Mitigation Measure AQ-3) would be conducted on a case-by-case basis as individual, future development projects accommodated through the proposed Project proceed. Future development would be required to mitigate construction-related emissions to below SCAQMD's thresholds of significance. A future development with daily construction-related emissions below these thresholds is considered to have a less than significant impact.

Project implementation would facilitate housing development throughout the City to meet the residents' varied housing needs. Future development would occur on parcels that are currently vacant or under-utilized, as well as fully improved. Such development would result in new temporary construction emissions being generated. Unlike an individual project for which project-specific construction information is available, it is infeasible to quantify all the individual projects that would contribute incrementally to construction emissions throughout the City. However, generally, construction equipment emits criteria pollutants, and construction activities such as grading generate fugitive dust emissions including PM10 and PM2.5. The cumulative emissions resulting from all construction activities throughout the City could potentially affect sensitive receptors. In the absence of data to prove otherwise, it is therefore assumed that future development would result in varying amounts of construction on a daily and annual basis through buildout that would be cumulatively significant, even if individually consistent with applicable construction thresholds.

In addition to site-specific mitigation that would be determined on a project-by-project basis, existing City practices, and SCAQMD rules would reduce construction-related emissions. However, even where such measures would reduce an individual project's emissions to less than significant levels, none of the

measures serve to prevent individual actions from being constructed concurrently and thus resulting in cumulatively significant impacts. Additionally, neither the amount of construction occurring nor the exact location within the City is foreseeable, thus, it cannot be determined if the resultant construction emissions could be adequately controlled or reduced to below regulatory thresholds. Without such information, it is not possible to conclude that air pollutant emissions resulting from construction activities would be adequately reduced. Moreover, mitigation requiring that the Project reduce its development potential to densities/intensities that would yield emissions below the significance thresholds would be infeasible, given State law requires that the City accommodate their RHNA "fair share" of the region's housing needs, which cannot be achieved without the proposed rezoning and the future development. Future development would be subject to compliance with applicable GP 2025 policies and SCAQMD rules and regulations, as well as Mitigation Measure AQ-3 to reduce short-term construction-related air emissions to below SCAQMD significance thresholds. With mitigation, the Project's short-term construction-related air emissions would not exceed SCAQMD thresholds for all criteria pollutants, as shown in DEIR Table 4.1-4. However, given the uncertainty concerning project timing and location, impacts associated with short-term construction-related air emissions would remain significant and unavoidable, and a Statement of Overriding Considerations would be required should the City choose to approve the Project.

LONG-TERM OPERATIONAL EMISSIONS

The DEIR incorporates a CalEEMod analysis which included specific data for the types and amounts of future development to determine the pollutant emissions anticipated at full Project build out (i.e., assuming development of all candidate sites). This data includes dwelling units, nonresidential land use square-footage, average daily trips, vehicle miles traveled, and average trip lengths. Where Project-specific data was not available, CalEEMod defaults were used.

Mobile and stationary source operational emissions would result from normal daily activities at each respective development site after occupancy (i.e., increased concentrations of O_3, PM_{10}, and CO). Mobile source emissions would be generated by the motor vehicles traveling to and from their respective sites. Stationary area source emissions would be generated by natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products. Stationary energy emissions would result from energy consumption associated with the future development. The estimated operational emissions associated with each of these sources are presented in DEIR Table 4.1-5, *Long-Term Operational Air Emissions*, and discussed below.

As concluded in DEIR Table 4.1-5, the total net emissions from future development would exceed the SCAQMD thresholds for ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$. While some of the individual development projects may be able to incorporate design and reduction features that would reduce emissions to below SCAQMD thresholds, the overall Project must be evaluated for significance consideration.

It is noted that operations associated with future development would occur in incremental phases over time based upon numerous factors, including market demand, and economic and planning considerations. Quantifying future development's individual operational air emissions is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, etc., among other factors, which are presently unknown. Since these factors can vary so widely (and individual project-related operations would occur over time dependent upon numerous factors), quantifying precise operational emissions and impacts would be impractical. Depending on how development proceeds, operational emissions associated with future development could exceed SCAQMD thresholds of significance.

As previously noted, the SCAQMD has established methodology protocols for preparation of air quality assessments and GP 2025 Policy AQ-3.4 requires that projects mitigate, to the extent feasible, anticipated emissions, which exceed SCAQMD thresholds. Future development would also be subject to compliance

with applicable GP 2025 policies intended to reduce long term operational emissions (i.e., Policy AQ-3.7 and AQ-4.6, among others). Refer to DEIR Appendix E for the full text of these policies.

The SCAQMD's significance thresholds would be relied upon to determine the significance level of a future project's operational impact. Additionally, the appropriate SCAQMD recommended Basin emissions modeling input parameters would be employed, among other procedures, to evaluate potential operational air quality impacts. Future multi-family residential developments proposing 541 DU or more would be required to conduct project-level assessments of operational air quality impacts (see proposed Mitigation Measure AQ-4). Future development would be required to mitigate operational emissions to below SCAQMD's thresholds of significance. Operational emissions for future multi-family residential developments proposing fewer than 541 DU would not exceed SCAQMD's thresholds of significance. A future development with daily operational emissions below SCAQMD thresholds is considered to have a less than significant impact. Future mixed-use developments (not proposed multi-family residential by right uses) would be evaluated at the project-level, when individual projects are implemented. Future mixed-use developments would be subject to review under CEQA.

Future development would be subject to compliance with applicable GP 2025 policies and SCAQMD rules and regulations, as well as Mitigation Measure AQ-4 to reduce long-term operational air emissions to below SCAQMD significance thresholds. Nonetheless, the Project's long-term air emissions would exceed SCAQMD thresholds for all criteria pollutants as shown in DEIR Table 4.1-5. Therefore, impacts associated with long-term operational air emissions would remain significant and unavoidable after implementation of mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project.

The following mitigation measures will be implemented:

AQ-1 In accordance with SCAQMD Rule 403, the contractor shall control excessive fugitive dust emissions during construction through regular watering or other dust prevention measures, and through compliance with SCAQMD Rule 402, which requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. As specified in the SCAQMD's Rules and Regulations, the following shall be implemented during construction:

- All active portions of the construction site shall be watered every three hours during daily construction activities and when dust is observed migrating from the construction site to prevent excessive amounts of dust.

- A construction relations officer shall be appointed to act as a community liaison concerning on-site construction activity including resolution of issues related to particulate matter generation.

- During daily construction activities, unpaved access roads, parking areas, and staging areas shall be paved or water shall be applied every three hours, non-toxic soil stabilizers applied. More frequent watering shall occur if dust is observed migrating from the site during site disturbance.

- Any on-site stockpiles of debris, dirt, or other dusty material shall be enclosed, covered, watered twice daily, or non-toxic soil binders shall be applied.

- All grading and excavation operations shall be suspended when wind speeds exceed 25 miles per hour.

- Disturbed areas shall be replaced with ground cover or paved immediately after construction is completed in the affected area.

- Track-out devices such as gravel bed track-out aprons (3 inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes) shall be provided to reduce mud/dirt trackout from unpaved truck exit routes. Alternatively, a wheel washer shall be used at truck exit routes.

- On-site vehicle speed shall be limited to 15 miles per hour.

- Before departing the construction site, all material to be transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.

- Construction trucks shall be rerouted away from congested streets or sensitive receptor areas.

- Construction drawings shall specify SCAQMD Rule 402 and Rule 403 requirements.

AQ-2 To reduce ROG emissions resulting from application of architectural coatings, the contractor for future development exceeding the SCAQMD construction thresholds shall implement the following measures during construction:

- High-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent shall be used;

- Coatings and solvents used shall have a ROG content lower than required under Rule 1113; and

- Pre-painted construction materials shall be used.

AQ-3 Construction-Related Emissions. Prior to demolition, grading, or building permit approval, and in accordance with SCAQMD's promulgated methodology protocols, an Air Quality Assessment for Construction-Related Emissions shall be prepared for projects exceeding the development scenario of 774 DU and 878,720 SF non-residential uses, or the exclusively residential scenario of 1,007 DU, that would exceed the following SCAQMD significance thresholds for construction-related emissions (or those in place at the time of the development application). Future development shall mitigate construction-related emissions to below SCAQMD's thresholds of significance.

Phase	Pollutant (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Construction-Related	75	100	550	150	150	55
CO = carbon monoxide; VOC = volatile organic compounds; NO_X = nitrogen oxides; PM_{10} = particulate matter smaller than 10 microns; $PM_{2.5}$ = particulate matter smaller than 2.5 microns						
Source: South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993. Revised November 1993.						

AQ-4 Operational Emissions. Prior to demolition, grading, or building permit approval, and in accordance with SCAQMD's promulgated methodology protocols, an Air Quality Assessment for Operational Emissions shall be prepared for multi-family residential projects proposing 541 dwelling units or more that would exceed the following SCAQMD thresholds of significance for

operational emissions (or those in place at the time of the development application). Future development shall mitigate operational emissions to below SCAQMD's thresholds of significance.

Phase	Pollutant (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Operations	55	55	550	150	150	55
CO = carbon monoxide; VOC = volatile organic compounds; NO_X = nitrogen oxides; PM_{10} = particulate matter smaller than 10 microns; $PM_{2.5}$ = particulate matter smaller than 2.5 microns						
Source: South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993. Revised November 1993.						

3. Cumulative Emissions Impacts

Threshold: Would the Project 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)?

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.1-24 and 4.1-31 to 4.1-34)

Explanation: As discussed above, the Project's short-term construction and long-term operational emissions would exceed SCAQMD thresholds. Future development would result in the criteria pollutant emissions for which the project area is in non-attainment during both project construction and operations. However, the timing, exact location, and level of activity of future development is unknown and therefore cumulatively considerable increases to criteria pollutant levels cannot be quantified. Despite compliance with existing regulations and policies and implementation of proposed mitigation measures, the Project would result in significant and unavoidable cumulative impacts. A discussion of cumulative air quality impacts is provided in DEIR Section 4.1.5, *Cumulative Impacts* as well as Section 4.4, *Findings Regarding Cumulative Impacts* of this document. (DEIR pages 4.1-24 and 4.1-31 to 4.1-34)

Refer to Mitigation Measures AQ-1 through AQ-4, described above.

4. Localized Pollutant Concentrations

Threshold: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.1-25 to 4.1-31)

Explanation: As the site-specific details (construction phasing, equipment, intensity, etc.) for each individual development project are unknown at this time, project-level analysis for impacts regarding localized pollutant concentrations cannot be accurately determined using SCAQMD's localized significance thresholds (LST) analysis methodology. Site-specific acreages, uses, and distances to sensitive receptors are required to calculate localized pollutant concentrations at sensitive receptors. Sensitive population groups include children, the elderly, and the acutely ill and the chronically ill, especially those with cardio-respiratory diseases. Sensitive receptors are those areas where sensitive populations may be for extended periods of time, resulting in sustained exposure to any pollutants present.

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated

June 2003 [revised July 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific level proposed projects. The SCAQMD provides the LST lookup tables based on distance from the project (meters) for one, two, and five acre projects emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that any project over five acres perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The candidate sites are located within Sensitive Receptor Area (SRA) 23, Metropolitan Riverside County.

To provide a reference of the types of emissions associated with representative construction and operational activities for the proposed Project, a hypothetical five-acre analysis for a 90th percentile project (i.e., 351 DU and 347,098 SF non-residential uses) is presented; see DEIR Table 4.1-6, Localized Significance Analysis for Construction and Operations – Five-Acre Site. The 5-acre LST thresholds were used in Table 4.1-6, as the Project would include 28 candidate sites (approximately 41 percent) that are five acres or greater. As indicated in DEIR Table 4.1-6, the construction emissions for the scenario analyzed would not exceed the LSTs for NO_x, CO, PM_{10}, and/or $PM_{2.5}$. However, operational on-site area emissions would exceed the LSTs for PM10 at a distance of 25 to 200 meters, and at all distances (i.e., 25 to 500 meters to the nearest receptor) for $PM_{2.5}$. Although future development would be required to comply with the Air Quality Element's objectives and policies, as well as all SCAQMD rules and regulations, the localized significance impacts for future development would be significant and unavoidable due to the analyzed scenario's development size.

TOXIC AIR CONTAMINANTS

The Project includes multiple candidate sites that are along State Route 91 (SR-91) and Interstate 215 (I-215). Based on Caltrans Traffic Census, SR-91 traffic volumes total 209,000 daily vehicles in the Project vicinity, including 16,072 daily trucks and I-215 traffic volumes total 153,000 daily vehicles including 10,864 daily trucks. The proximity of existing and proposed sensitive uses to these freeways poses concerns for potential exposure of future development to toxic air contaminants (TAC) from these sources.

The Multiple Air Toxics Exposure Study IV (MATES IV) is a TAC monitoring and evaluation study conducted by the SCAQMD. The MATES IV study consists of a monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to characterize risk throughout the Basin. The study concentrates on the carcinogenic risk from exposure to air toxics. Ten monitoring locations measured toxic air contaminants (over 30 air pollutants) once every three days for two years; see MATES IV Figure ES-1, Map of MATES IV Monitoring Sites, which illustrates the locations of the ten sites.

The carcinogenic risk from air toxics in the Basin, based on average concentrations at the fixed monitoring locations, is about 420 per million (a reduction from the 1,200 per million in the MATES III study). This risk refers to the expected number of additional cancers in a population of one million individuals that are exposed over a 70-year lifetime. Under the MATES IV methodology, approximately 68 percent of the risk is attributed to diesel particulate emissions. This is a lower portion of the overall risk compared to the MATES III estimate of about 84 percent. Approximately 90 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating. Overall, the MATES IV Study found a decreasing risk for air toxics exposure compared to previous MATES studies. Additionally, the MATES IV study found an estimated Basin-wide population-weighted risk reduced by 57 percent from the MATES III Study, which includes the City. Additionally, the ambient air toxics data from the ten fixed monitoring sites demonstrated a reduction in air toxic levels and risks.

The *CARB Air Quality and Land Use Handbook* (April 2005), recommends avoiding siting new sensitive land uses within 500 feet of a freeway or urban road with 100,000 vehicles per day, and/or within 1,000 feet of a distribution center that accommodates more than 100 trucks per day. This limit for trucks applies to diesel trucks with a gross vehicle weight rating (GVWR) greater than 14,000 pounds (GVWR Classes 4 through 8). SR-91 and I-215 are urban freeways that carry over 200,000 vehicles per day. Future development includes new sensitive land uses (i.e., residential uses), which could be located within 500 feet of SR-91 and I-215, and/or within 1,000 feet of an industrial use/distribution center that generates more than 100 truck trips per day. Therefore, Project implementation could expose sensitive receptors to substantial pollutant concentrations associated with existing land uses, which could result in health effects. In addition, the future development includes mixed-uses (i.e., commercial use), which could generate more than 100 truck trips per day, and which could be located within 1,000 feet of existing or proposed sensitive land uses. Therefore, the proposed mixed-uses could expose existing or proposed sensitive receptors with existing or proposed land uses to substantial pollutant concentrations, which could result in health effects. The range of exposure from diesel trucks varies greatly, based on specific travel patterns, size and number of diesel trucks, types of trucks, on-site diesel equipment, and use of auxiliary diesel-powered equipment (e.g., diesel-powered transport refrigeration units [TRU]). The diesel PM emissions from these facilities are dependent upon the size (horsepower), age, and number of engines, emission rates, the number of hours the truck engines and/or TRUs operate, distance, and meteorological conditions at the site. CARB's assessment assumes a total on-site operating time for all TRUs of 300 hours per week, equivalent of 40 TRU-equipped trucks a day, each loading or unloading on-site for one hour, 12 hours a day and seven days a week. As CARB has not conducted a risk assessment for distribution centers based on truck traffic alone, but on an emissions basis, CARB expects similar risks for a facility with truck volumes in the range of 100 per day.

Several candidate sites are located within the CARB specified buffer distances for freeways, railways, and distribution centers/industrial sites, as depicted on DEIR Exhibit 4.1-1a and Exhibit 4.1-1b, *Candidate Sites in Proximity to Potential TAC Sources*, and DEIR Table 4.1-7, *Candidate Sites in Proximity to Potential TAC Sources*. The candidate sites identified in Table 4.1-7 would require a more detailed site-specific analysis of TAC impacts, as required by proposed Mitigation Measures AQ-5 and AQ-6. It is noted that DEIR Table 4.1-7 is based on existing on the ground surrounding uses, and does not account for future TAC sources that may be developed (e.g., a future distribution center warehouse or a new stationary TAC source).

As noted above, the proximity of several candidate sites to SR-91, I-215, and/or railroads poses a concern for potential exposure of future development to TACs from these sources. Therefore, a project-specific Health Risk Assessment (HRA) shall be required for residential uses that could be located within 500 feet of SR-91 or I-215 in compliance with proposed Mitigation Measure AQ-5. Proposed Mitigation Measure AQ-6 requires similar standards for sensitive receptors that would be located within 1,000 feet of a distribution center/warehouse facility. With implementation of proposed Mitigation Measures AQ-5 and AQ-6, air toxic impacts would be less than significant.

The following mitigation measures will be implemented:

Refer to proposed Mitigation Measures AQ-1 through AQ-4, as well as the following:

AQ-5 A project-specific Health Risk Assessment shall be conducted for future residential development proposed within 500 feet of the SR-91 freeway right-of-way, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. The Health Risk Assessment shall evaluate a project per the following SCAQMD thresholds:

- Cancer Risk: Emit carcinogenic or toxic contaminants that exceed the maximum individual cancer risk of 10 in one million.

- Non-Cancer Risk: Emit toxic contaminants that exceed the maximum hazard quotient of one in one million.

The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index less of than one (1.0) means that adverse health effects are not expected.

If projects are found to exceed the SCAQMD's Health Risk Assessment thresholds, mitigation shall be incorporated to reduce impacts to below SCAQMD thresholds.

AQ-6 Future residential development shall not be located closer than 1,000 feet from any existing or proposed distribution center/warehouse facility which generates a minimum of 100 heavy truck trips per day, or 40 truck trips with transport refrigeration units (TRUs) per day, or TRU operations exceeding 300 hours per week, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. If future residential development cannot meet this setback, a project-specific Health Risk Assessment shall be prepared to evaluate a project for the SCAQMD thresholds (i.e., carcinogenic risk equals or exceeds 10 in one million; acute non-carcinogenic hazard index equals or exceeds one; and/or if chronic non-carcinogenic hazard index equals or exceeds one, as outlined above). If projects are found to exceed the SCAQMD's Health Risk Assessment thresholds, mitigation shall be incorporated to reduce impacts to below SCAQMD thresholds.

B. CULTURAL AND TRIBAL CULTURAL RESOURCES

1. Historical Resources

Threshold: Would the Project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.3-26 to 4.3-37)

Explanation: DEIR Impact 4.3-1 discusses National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), Eastern Information Center (EIC), and City of Riverside-designated historic resources located within and adjacent to the boundaries of candidate sites.

HISTORIC RESOURCES WITHIN CANDIDATE SITES

National Register of Historic Places. There are no NRHP-designated historical resources located within the boundaries of candidate sites. Therefore, no direct impact to NRHP-designated historical resources would occur.

California Register of Historic Places. There are no CRHR-designated historical resources located within the boundaries of candidate sites. Therefore, no direct impact to CRHR-designated historical resources would occur.

City of Riverside-Designated Structures/Resources of Merit. DEIR Table 4.3-5, *City Structure/Resource of Merit (Within/Adjacent to a Candidate Site)* summarizes the resources revealed through City GIS and indicates that Candidate Site W5G3S12 supports one (1) City-designated Structure/Resource of Merit within its boundaries (3035 Van Buren Boulevard). This City-designated Structure/Resource of Merit is described in DEIR Table 4.3-5.

As concluded in DEIR Section 4.3, future development of Candidate Site W5G3S12 could result in the removal of the City-designated Structure/Resource of Merit at 3035 Van Buren Boulevard. Pursuant to RMC Chapter 20.25, Certificates of Appropriateness, demolition or removal of any designated cultural resource, including City-designated Structures/Resources of Merit, would mandate a Certificate of Appropriateness by the Riverside Cultural Heritage Board, Cultural Resources Administer, or by City Council on appeal. It is presently unknown whether the Riverside Cultural Heritage Board, Cultural Resources Administer, or City Council would grant a Certificate of Appropriateness for removal of the City-designated Structure/Resource of Merit at 3035 Van Buren Boulevard. Therefore, the Project could cause a substantial adverse change in the significance of this historical resource and impacts would be significant and unavoidable. A Statement of Overriding Considerations would be required should the City choose to approve the Project.

City of Riverside-Designated Historic Landmarks. DEIR Table 4.3-6, *City Historic Landmarks (Within/Adjacent to a Candidate Site* summarizes the resources revealed through City GIS and indicates that Candidate Site W5G1S16 supports three (3) City-designated Historic Landmarks within its boundaries: at 9262 Magnolia Avenue; at 9204 Magnolia Avenue; and at 9216-9258 Magnolia Avenue. These City-designated Historic Landmarks are described in DEIR Table 4.3-6.

Future development occurring on Candidate Site W5G1S16 could result in removal of these City-designated Historic Landmarks at 9262 Magnolia Avenue, 9204 Magnolia Avenue, and 9216-9258 Magnolia Avenue. Pursuant to RMC Chapter 20.25, demolition or removal of any designated cultural resource, including City-designated Historic Landmarks, would mandate a Certificate of Appropriateness by the Riverside Cultural Heritage Board, Cultural Resources Administer, or by City Council on appeal. It is presently unknown whether the Riverside Cultural Heritage Board, Cultural Resources Administer, or City Council would grant a Certificate of Appropriateness for removal of the City-designated Historic Landmarks at 9262 Magnolia Avenue, 9204 Magnolia Avenue, and 9216-9258 Magnolia Avenue. Therefore, the Project could cause a substantial adverse change in the significance of these historical resources and impacts would be significant and unavoidable. A Statement of Overriding Considerations would be required should the City choose to approve the Project.

EIC Historical Resources. DEIR Table 4.3-8, *Historical Resources Within/Adjacent to a Candidate Site* summarizes the resources revealed through the records search and indicates that the following three candidate sites support historic resources (all historic-period buildings) within their boundaries: W5G1S11 (P-33-13080); W5G4S12 (P-33-9046); and W5G1S13 (P-33-24194). These historic resources are listed and described in DEIR Table 4.3-9, *Historic Resources Within Candidate Sites*.

- Candidate Site W5G1S11. Future development on Candidate Site W5G1S11 would remove P-33-13080. P-33-13080 was previously evaluated for the NRHP and CRHR and was found not to be eligible under any of the significance criteria. However, records indicate that this eligibility determination occurred more than five years ago, making it necessary to re-evaluate P-33-13080 for NRHP and CRHR-eligibility. Pursuant to proposed Mitigation Measure CUL-1, prior to demolition, grading, or building permit approval, any site with buildings over 45 years in age not subject to previous identification, recordation on Department of Park and Recreation (DPR) 523 Forms, and NRHP, CRHR, and/or City-designated Structures/Resources of Merit eligibility evaluation (as appropriate) within the last five years, shall be evaluated by a Secretary of the Interior

Qualified Cultural Resource Professional specializing in Architectural History. Eligibility would necessitate preservation or mitigation. If P-33-13080 is not eligible for NRHP or CRHR, removal would not constitute a significant adverse impact and impacts would be less than significant.

- Candidate Site W5G4S12. Although Candidate Site W5G4S12 was previously occupied by a historic building, it is currently vacant; therefore, no direct impact to historic resources would occur with development of this property.

- Candidate Site W5G1S13. Future development on Candidate Site W5G1S12 would remove P-33-24194. P-33-24194 was previously evaluated for the NRHP and was found not to be eligible under any of the significance criteria. However, records indicate that this eligibility determination occurred more than five years ago, making it necessary to re-evaluate P-33-24194 for NRHP and CRHR-eligibility; see proposed Mitigation Measure CUL-1. If P-33-24194 is not eligible for NRHP or CRHR, removal would not constitute a significant adverse impact and impacts would be less than significant.

Impact Conclusion. Following compliance with proposed Mitigation Measure CUL-1, future development would not cause a substantial adverse change in the significance of historic resources P-33-13080 and P-33-24194 and a less than significant impact would occur in this regard.

CANDIDATE SITES WITHIN A HISTORIC DISTRICT OR NEIGHBORHOOD CONSERVATION AREA

City of Riverside-Designated Historic Districts. DEIR Table 4.3-2, *Existing and Potential City Historic Districts (Within/Adjacent to a Candidate Site)* summarizes the resources revealed through City GIS and indicates Candidate Site W1G4S03 is located within the boundary of the Woods Street Historic District. Candidate Site W1G4S03 currently supports a surface parking lot associated with Riverside Community College and thus is not identified as a contributing structure to the Woods Street Historic District. Therefore, future development would not result in the removal of a contributing structure to a City-designated Historic District. Therefore, Project implementation would result in a less than significant impact concerning a City-designated Historic District.

City of Riverside-Designated Neighborhood Conservation Areas. DEIR Table 4.3-4, *Neighborhood Conservation Areas (Within/Adjacent to a Candidate Site)* summarizes the resources revealed through City GIS and indicates Candidate Site W1G4S03 is located within the boundary of the Woods Street Neighborhood Conservation Area and Candidate Site W5G1S19 is located within the boundary of the Arlington Village Commercial Neighborhood Conservation Area.

Candidate Site W1G4S03. As discussed above, Candidate Site W1G4S03 currently supports a surface parking lot associated with Riverside Community College, and is not identified as a "Contributor" for the Woods Street Neighborhood Conservation Area; see DEIR Table 4.3-10, *City of Riverside-Designated Neighborhood Conservation Area Contributors*.

Candidate Site W5G1S19. Candidate Site W5G1S19 currently supports a variety of parcels involving commercial uses that are identified as "Contributors" for the Arlington Village Commercial Neighborhood Conservation Area; see DEIR Table 4.3-10.

Impact Conclusion. Future development occurring on Candidate Site W5G1S19 could result in the removal of 13 Contributors to the Arlington Village Commercial Neighborhood Conservation Area; see DEIR Table 4.3-10. GP FPEIR Mitigation Measure Cultural 5 addresses potential impacts to historic resources that may be adversely affected by future development. GP FPEIR Mitigation Measure Cultural 5 specifies that for adverse impacts to individual historic resources (such as those on the NRHP, CRHR, or City Landmark, Structure of Merit eligible), mitigation considered shall include avoidance, among others. Therefore, in compliance with GP FPEIR Mitigation Measure Cultural 5, proposed Mitigation Measure CUL-2 requires that Candidate Site W5G1S19 be excluded from the Project (i.e., Tool H-21). Following compliance with GP FPEIR Mitigation Measure Cultural 5 and proposed Mitigation Measure CUL-2, impacts to City-designated Arlington Village Commercial Neighborhood Conservation Area resulting from future development of Candidate Site W5G1S19 would be less than significant.

HISTORIC RESOURCES ADJACENT TO THE CANDIDATE SITES

National Register of Historic Places. Candidate Site W2G2S01 is located adjacent/east of the Farmhouse Motel (1393 University Avenue), which is eligible for NRHP listing. Although future development would occur within each respective site and thus would not directly impact the Farmhouse Motel (1393 University Avenue), future development could cause a substantial adverse change in the significance of this NRHP-eligible resource located adjacent to Candidate Site W2G2S01, given its proximity. Refer to the Conclusion Section below.

California Register of Historic Places. There are no CRHR-designated historic resources located directly adjacent to the boundaries of a candidate site. Therefore, no indirect impact to CRHR-designated historic resources would occur.

City of Riverside-Designated Structures/Resources of Merit. DEIR Table 4.3-6 summarizes the resources revealed through City GIS and indicates that: Candidate Site W1G4S03 is located adjacent to City-Designated Structure/Resource of Merit CHM-648 (3493 Ramona Drive); Candidate Site W2G2S03 is located adjacent to 1855-1857 University Avenue; and Candidate Site W2G4S30 is located adjacent to CHM-091 (2009 Patterson Street) and CHM-090 (2008 Patterson Street). Although future development would occur within each respective site and thus would not directly impact CHM-648, 1855-1857 University Avenue, CHM-091, or CHM-090, future development could cause a substantial adverse change in the significance of these City-designated Structures/Resources of Merit located adjacent to candidate sites, given their proximity. Refer to the Conclusion Section below.

City of Riverside-Designated Historic Landmarks. DEIR Table 4.3-7 summarizes the resources revealed through City GIS and indicates that the following candidate sites are located adjacent to City-designated Historic Landmarks:

- Candidate Site W2G2S01 (1393 University Avenue);
- Candidate Site W2G2S02 (CHL-052 Weber House);
- Candidate Site W2G2S06 (1651 University Avenue);
- Candidate Site W5G1S02 (9856 Magnolia Avenue); and
- Candidate Site W7G3S14 (CHL-118 Five Points).

Although future development would occur within each respective site and thus would not directly impact these resources, future development could cause a substantial adverse change in the significance of these City-designated Historic Landmarks located adjacent to candidate sites, given their proximity. Refer to the Conclusion Section below.

EIC Historical Resources. DEIR Table 4.3-9 summarizes the historic resources revealed through the records search and indicates 17 historic-period buildings are located adjacent to seven (7) candidate sites; see also DEIR Table 4.3-11, *Historic Resources Adjacent to Candidate Sites*. Refer to the Conclusion Section below.

Conclusion. In summary and as discussed in detail above, the following candidate sites would be located adjacent to a historic resource:

- W1G4S03;
- W1G4S44;
- W2G2S01;
- W2G2S02;
- W2G2S03;
- W2G2S06;
- W2G4S30;
- W4G4S42;
- W5G1S02;
- W5G1S19;
- W5G1S11/W5G4S12
- W5G4S23;
- W6G4S33;
- W6G4S41; and
- W7G3S17.

Although future development would occur within each respective site and thus would not directly impact the adjacent historic resources described above, future development could cause a substantial adverse change in the significance of the historic resources located adjacent to candidate sites, given their proximity. Demolition activities and new construction on adjacent sites can adversely impact the physical integrity of these resources. Additionally, adjacent construction can expose the adjacent resource to dust and vibration that would normally occur only over time. The force of vibrations reaching the adjacent historic resources would depend upon several variables, including the activity generating the vibrations, the distance between the source and the existing structure, and the type of soil or pavement found between the two. Depending upon the nature of the development, the necessary protective measures may be limited to simply documenting and monitoring the historic site/structure or may require a more detailed plan that includes a range of precautionary measures. To avoid potential impacts, proposed Mitigation Measure CUL-3 requires

a comprehensive Construction Protection Plan (CPP) that would provide adequate protection to historic resources located within 50 feet of construction activities involving pile driving, pursuant to National Park Service recommendations for protecting a historic structure during adjacent construction (see also proposed Mitigation Measure NOI-1). The CPP would require consultation between the stakeholders, documentation of the historic resource prior to commencement of construction, implementation of protective measures on both the construction site and historic resource site, and regular monitoring. Mitigating the effects of vibrations would begin during the consultation process when acceptable levels can be set and alternative processes (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers, non-displacement piles that are inserted in bored holes rather than driven, "jacking-in" or pressing the piles into the ground, and locating delivery entry/exit points farther from the historic site) are specified. Continual crack and vibration monitoring of cultural resources would be required as a warning system to prevent exceedances of previously established safe thresholds. Additionally, proposed Mitigation Measure CUL-4 specifies contractor requirements and requires that protective measures developed through proposed Mitigation Measure CUL-3 be included on construction documents.

The GP 2025 Historic Preservation Element includes several policies intended to guide development to ensure the identification, designation, and protection of historic resources are part of the City's community planning, development, and permitting process (i.e., Policies PS-11.2, PS-11.3, HP-1.1, HP-1.2, HP-1.5, HP-1.6, HP-1.7, HP-2.1, HP-2.2, HP-3.1, HP-3.2, HP-4.1, HP-4.2, HP-4.3, HP-5.1, HP-7.1, HP-7.2, HP-7.3, and HP-7.4). Refer to DEIR Appendix E for the full text of these policies. Following compliance with proposed Mitigation Measures CUL-3 and CUL-4, as well as the specified GP 2025 policies, future development would not cause a substantial adverse change in the significance of the historic resources located adjacent to a candidate site and a less than significant impact would occur in this regard.

CANDIDATE SITES ADJACENT TO A HISTORIC DISTRICT OR NEIGHBORHOOD CONSERVATION AREA

City of Riverside-Designated Historic Districts. DEIR Table 4.3-2 summarizes the resources revealed through City GIS and indicates that no candidate sites are located adjacent to City-designated Historic Districts. No indirect impacts to City-designated Historic Districts would occur.

City of Riverside-Designated Neighborhood Conservation Areas. DEIR Table 4.3-4 summarizes the resources revealed through City GIS and indicates Candidate Site W5G1S13 is located adjacent to the Lafayette Street Neighborhood Conservation Area. More specifically, Candidate Site W5G1S13 is located within 50 feet of APNs 191231013 and 191232013, which are identified as "Contributors" to the Lafayette Street Neighborhood Conservation Area. Although future development would occur within Candidate Site W5G1S13 and thus would not directly impact the Lafayette Street Neighborhood Conservation Area, future development could cause a substantial adverse change in the significance of APNs 191231013 and 191232013, given their proximity. To avoid potential indirect impacts to adjacent Neighborhood Conservation Area Contributors (APNs 191231013 and 191232013), future development would be subject to proposed Mitigation Measures CUL-3 and CUL-4, described above. Following compliance with proposed Mitigation Measures CUL-3 and CUL-4, as well as the specified GP 2025 policies, future development on Candidate Site W5G1S13 would not cause a substantial adverse change in the significance of the adjacent Lafayette Street Neighborhood Conservation Area Contributors and a less than significant impact would occur in this regard.

The following mitigation measures will be implemented:

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

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

a. Avoidance.
b. Changes to the structure provided pursuant to the Secretary of Interior's Standards.
c. Structure relocation.
d. Structure recordation to HABS/HAER standard if demolition is allowed.

For adverse impacts to a City designated Historic District, mitigation considered shall include, but not limited to, in order of preference:

a. Avoidance.
b. Property recordation to HABS/HAER standard if demolition is allowed.
c. Demolition is to be considered only if mitigation as described above is not feasible.

CUL-1 Prior to demolition, grading, or building permit approval, any candidate site with buildings over 45 years in age not subject to previous identification, recordation on Department of Park and Recreation (DPR) 523 Forms, and NRHP, CRHR, and/or City of Riverside-designated Structures/Resources of Merit eligibility evaluation (as appropriate) within the last five years, shall be evaluated by a Secretary of the Interior Qualified Cultural Resource Professional specializing in Architectural History. Results of the evaluation shall specify site-specific mitigation requirements.

CUL-2 Concurrent with the proposed Zoning Code Map Amendment (Planning Case No. P17-0180), and to avoid potential impacts to previously recorded City of Riverside-designated contributors to the Arlington Village Commercial Neighborhood Conservation Area, Candidate Site W5G1S19 shall be avoided through exclusion (i.e., Tool H-21, Rezoning Program).

CUL-3 To avoid impacts to previously recorded historic resources located within 50 feet of construction activities involving pile driving (if any) on the candidate sites listed below, prior to demolition, grading, or building permit approval for the candidate sites, a site-specific Construction Protection Plan (CPP) shall be prepared by a qualified Historic Building Architect. The CPP shall specify mitigation to avoid or reduce impacts to less than significant.

Nearest Candidate Site	Adjacent Resource and Location
W1G4S03	City of Riverside-Designated Structure/Resource of Merit CHM-648 (3493 Ramona Drive) (adjacent south)
W1G4S44	P-33-11475: Historic-period building (adjacent south)
W2G2S01	City of Riverside-Designated Historic Landmark at 1393 University Avenue (adjacent west)
W2G2S02	City of Riverside-designated Historic Landmark CHL-052 (Weber House) (adjacent west)
W2G2S03	City of Riverside-Designated Structures/Resources of Merit at 1855-1857 University Avenue (adjacent east)
W2G2S06	City of Riverside-Designated Historic Landmark at 1651 University Avenue (adjacent east)
W2G4S30	City of Riverside-Designated Structures/Resources of Merit CHM-091 (2009 Patterson Street) and CHM-090 (2008 Patterson Street) (adjacent west)
W4G4S42	P-33-7818: Historic-period archaeological site (adjacent south)
W5G1S02	City of Riverside-Designated Historic Landmark at 9856 Magnolia Avenue (adjacent west)
W5G1S13	City of Riverside-Designated Lafayette Street Neighborhood Conservation Area (adjacent north)
W5G1S19	P-33-9007: Historic-period building (adjacent southeast) P-33-9047: Historic-period building (adjacent southeast) P-33-9048: Historic-period building (adjacent southeast) P-33-9049: Historic-period building (adjacent southeast) P-33-9051: Historic-period building (adjacent southeast) P-33-9052: Historic-period building (adjacent southeast) P-33-11251: Historic-period building (adjacent southwest)
W5G1S11/W5G4S12	P-33-13081: Historic-period building (adjacent south) P-33-13082: Historic-period building (adjacent south) P-33-13083: Historic-period building (adjacent south) P-33-13084: Historic-period building (adjacent south) P-33-16974: Historic-period building (adjacent south)

Nearest Candidate Site	Adjacent Resource and Location
W5G4S23	P-33-12901: Historic-period building (adjacent northeast)
W6G4S33	P-33-21007: Historic-period building (adjacent south)
W6G4S41	P-33-21007: Historic-period building (adjacent south)
W7G3S14	City of Riverside-Designated Historic Resource CHL-118 (Five Points) (adjacent southwest)
Note: Refer to Appendix D, *Candidate Sites Table*, for a listing and description of the candidate sites.	
Source: BCR Consulting, *Cultural Resources Records Search for the City of Riverside 2014-2021 Housing Element Rezoning Program*, Table A, Records Search Results (One Half-Mile Radius), August 3, 2017.	

To provide adequate protection to the adjacent previously recorded historic resource, the CPP shall include the following components, pursuant to the National Park Service Preservation Tech Notes, Temporary Protection Number 3, Protecting a Historic Structure During Adjacent Construction:

1. Protocol for consultation between the historic building owner and project applicant to identify potential risks, negotiate changes, and agree upon protective measures;

2. Requirements for documentation of the condition of the adjacent historic building prior to any demolition/construction work, in a manner consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties.

3. Protective measures to be implemented at both the construction site and the historic site.

4. Mitigating the effects of vibrations shall begin during the consultation process when acceptable levels shall be set and alternative processes specified, as required. If vibrations are likely to damage adjacent structures, specific measures to mitigate potential impacts shall be identified during the consultation process. Alternative measures to be considered include the following, among others, as required:

   - Pile cushioning, jetting, predrilling, cast-in-place systems, or resonance-free vibratory pile drivers;

   - Hand demolition as a substitute when conventional demolition activities would cause excessive vibrations;

   - If pile driving is likely to damage adjacent structures, non-displacement piles that are inserted in bored holes rather than driven, "jacking-in" or pressing the piles into the ground, or other equally effective measure; and

   - Delivery entry and exit points that are located the further distance possible/feasible from the historic site.

5. Procedures for regular monitoring during construction to: identify damage; evaluate the efficacy of protective measures already in place; and identify and implement additional corrective measures, if needed. Continual crack and vibration monitoring shall be provided as a warning system to prevent exceedances of previously established (during the Consultation phase) safe thresholds.

6. All damage to historic structures shall be restored to its preexisting condition.

CUL-4 To avoid impacts to previously recorded resources located adjacent to candidate sites identified in CUL-3, prior to demolition, grading, or building permit approval for the candidate sites, the project applicant shall substantiate that:

- The Contractor conducting work on the construction site has submitted documents pertaining to protection of historic resources (i.e., Construction Protection Plan (CPP)) to the Community & Economic Development Department.

- Promotion of CPP awareness among all project participants.

- A Worker Historic Resources Awareness Program has been developed for implementation prior to demolition, grading, or building permit approval. The Program shall be implemented to educate all construction personnel (employees of contractors and subcontractors) who work on the project site or related facilities during demolition and construction concerning the adjacent historical resource. The training may be presented on electronic media in the form of a video recording.

- The construction plans specify that the Contractor shall not locate any equipment or deliver any materials or commence any work whatsoever that may impact adjacent historic resources.

- Each Contractor-Generated Submittal shall include the following:

  a) General location map of the development site showing where work on the Contract will be performed, including notation on the map of location of the historic resource (s).

  b) Listing of materials, products or construction equipment to be used in the course of the Contract that have the potential to come in contact with the historic resource, and the proposed methods to be employed to prevent any damage to said historic resources.

  c) In the event that the Contractor identifies potentially more effective and/or efficient methods of protection as construction proceeds, the Contractor shall provide said measures to the Community & Economic Development Department. Adjustments and modifications shall be documented with the City and on construction drawings.

C. GREENHOUSE GAS EMISSIONS

1. Greenhouse Gas Emissions

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

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.4-12 to 4.4-18)

Explanation: As discussed in DEIR Section 4.4, *Greenhouse Gas Emission*, approximately 67 percent of the candidate sites are improved and support approximately 66 DU and approximately 1.33 million SF of nonresidential uses. Future development would replace these existing uses with new residential and mixed uses. Further, the remaining approximately 125 acres, which are vacant, are surrounded by urbanized areas. The Project would accommodate future development of up to 11,715 DU and as much as 7.2 million SF of non-residential uses. Future development is expected to result in increased GHG emissions, largely due to increased vehicle miles traveled (VMT), as well as from construction activities, stationary area sources (i.e., natural gas consumption for space and water heating devices, landscape maintenance equipment operations, and use of consumer products), energy consumption, water supply, and solid waste generation. Increased GHG emissions could contribute to global climate change patterns and the adverse global environmental effects thereof. GHG emissions associated with future development include CO_2, N_2O, and CH_4.

SHORT-TERM CONSTRUCTION GHG EMISSIONS

Direct project-related GHG emissions typically include emissions from construction and operational activities. Future development construction activities would result in direct emissions of CO_2, N_2O, and CH_4 from construction equipment operations, as well as materials transport, and construction workers commutes to and from the construction site. Construction activities would consist of grading, demolition, excavation, cut-and-fill, paving, building construction, and application of architectural coatings. Construction activities associated with future development would occur in incremental phases over time based upon numerous factors, including market demand, and economic and planning considerations. Construction-related GHG emissions are typically site-specific and depend upon multiple variables. Quantifying individual future development's GHG emissions from short-term, temporary construction-related activities is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, construction schedules/duration, equipment requirements, etc., among other factors, which are presently unknown. Since these parameters can vary so widely (and individual project-related construction activities would occur over time dependent upon numerous factors), quantifying precise construction-related GHG emissions and impacts would be impractical. Depending on how development proceeds, construction-related GHG emissions associated with future development could exceed SCAQMD thresholds of significance. However, to provide a reference of the types of GHG emissions associated with representative individual construction activities, three hypothetical scenarios were modeled for different sizes of residential and commercial developments. The DEIR incorporated the following three construction modeling residential and non-residential development scenarios:

- Mean: 169 DU and 102,640 SF of non-residential uses;
- 90th Percentile: 351 DU and 347,098 SF of non-residential uses; and
- Maximum: 774 DU and 878,720 SF non-residential uses.

The construction emission estimates were based on a conservative assumption of a one-year construction duration, and the default construction equipment usage included in CalEEMod. It is also noted that these scenarios are considered a reasonable assumption of the development that could occur at any given time in the future. DEIR Table 4.4-1, *Typical Project Construction Greenhouse Gas Emissions*, presents the estimated daily short-term construction GHG emissions for the three hypothetical scenarios. As shown in DEIR Table 4.4-1, short-term construction GHG emissions would range between 19.51 and 53.34 MTCO2eq/yr. If all three development projects presented were occurring at the same time, the total amortized construction GHG emissions would be approximately 101.41 MTCO2eq/yr year. These values are an approximation for informational purposes and can vary widely depending upon the type and intensity of construction occurring at any given time.

LONG-TERM OPERATIONAL GHG EMISSIONS

The California Emissions Estimator Model (CalEEMod) computer model outputs contained within DEIR Appendix F were used to calculate mobile source, area source, energy source, solid waste, and water-related GHG emissions during future development operations. Operational GHG estimations are based on energy emissions from natural gas usage, electricity consumption, water demand, wastewater generation, solid waste generation, and automobile emissions. CalEEMod relies upon Project-specific land use data to calculate emissions; refer to DEIR Appendix F. DEIR Table 4.4-2, *Long-Term Operational Greenhouse Gas Emissions*, shows the long-term GHG emissions associated with future development.

Area Source Emissions

Area source emissions were calculated using CalEEMod and Project-specific land use data. As noted in DEIR Table 4.4-2, future development would result in 2,713.13 MTCO2eq/yr of area source GHG emissions.

Mobile Source Emissions

Default vehicular trip data and Project-specific land use data were utilized in CalEEMod to estimate mobile source GHG emissions for future development. As shown in DEIR Table 4.4-2, future development vehicular trips would account for approximately 364,135.44 MTCO2eq/yr.

Energy Consumption Emissions

Energy consumption emissions were calculated using CalEEMod and Project-specific land use data. Electricity would be provided to future development sites via Southern California Edison. Future development would result in 56,374.32 MTCO2eq/year of GHG emissions due to energy consumption; refer to DEIR Table 4.4-2.

Solid Waste Emissions

GHG emissions from solid waste associated with future development operations would result in 2,856.56 MTCO2eq/year; refer to Table 4.4-2.

Water Demand Emissions

As discussed, RPU and Western would be the purveyors of water to the future development. GHG emissions from indirect energy consumption associated with water supply would result in 7,828.29 MTCO2eq/year.

Total Operational Emissions

As shown in DEIR Table 4.4-2, the total GHG emissions from future development long-term operations would be approximately 433,907.75 MTCO2eq/yr, which would exceed the SCAQMD's 3,000 MTCO2eq/yr threshold. Additionally, based on a service population (SP) of 38,791 persons (refer to DEIR Section 3.0, *Basis of Cumulative Analysis*), Project GHG emissions would be 11.19 MTCO2eq/SP/year, which would exceed the 4.8 MTCO2eq/SP/year and 3.0 MTCO2eq/SP/year thresholds.

City of Riverside General Plan 2025 GHG Reduction Strategies

Due to the amount of future development, the Project's operational GHG emissions would conflict with AB 32 requirements to reduce statewide GHG emissions, which would be considered a significant impact. However, the GP 2025 includes polices which inherently relate to GHG emissions reductions within the City that would apply to the Project. GP 2025 Policies LU-8.1, LU-8.3, and AQ-8.23 promote infill development, mixed use development, and higher density/mixed use developments, respectively, for new development in the City that would reduce GHG emissions. The future development includes multi-family and mixed uses (residential and commercial) that would comply with GP 2025 Policies LU-8.1, LU-8.3, and AQ-8.23. The GP 2025 also contains policies related to circulation (Policies CCM-6.1, CCM-9.1, and OS-8.10) that aim to reduce VMT through compliance with Transportation Demand (TDM) programs administered by the SCAQMD and County of Riverside, and encouraging the use of public transportation and alternative transportation modes. Future development must comply with all SCAQMD and County of Riverside TDM programs, and future development residents, employees, and other users would be provided ample opportunities to use the City's public transportation system and bicycle network; see DEIR Section 4.9, *Transportation and Traffic*. Lastly, the GP 2025 contains the following air quality policies that would apply to the Project and further reduce GHG emissions: GP 2025 Policy AQ-8.15 (support SCAQMD GHG-reducing programs); GP 2025 Polices AQ-8.20 and AQ-8.21 (encourage green building principles in new development); and GP 2025 Policy AQ-8.24 (compliance with the GP FPEIR Mitigation Monitoring Program). Refer to DEIR Appendix E for the full text of these policies. All future development would be subject to compliance with GP 2025 Policies AQ-8.15, AQ-8.20, AQ-8.21, and AQ-8.24, as well as proposed Mitigation Measure GHG-1 (see below), to reduce operational GHG emissions. Further, future development would provide employment opportunities for Riverside residents near their residences and transportation centers, and thus, effectively reduce VMT and mobile GHG emissions compared to existing conditions.

State of California Regulations GHG Emissions Reduction Strategies

Mobile GHG Emissions. On September 24, 2009, CARB adopted amendments to the "Pavley" regulations (Pavley I) that reduce greenhouse gas (GHG) emissions in new passenger vehicles from 2009 through 2016. CARB's Low Emission Vehicle Program (LEV III) is a GHG reduction program that applies to vehicles sold between 2017 and 2025. These regulations provide ongoing improvement as older, less efficient vehicles are decommissioned, and new more efficient vehicles complying with the new standards are purchased. As a result, although mobile GHG emissions would increase due to future development (see DEIR Table 4.4-2), CARB's Pavley I and LEV III programs would reduce vehicle emissions greatly.

The Low Carbon Fuel Standards (LCFS) mandates that a statewide goal to reduce the carbon intensity of California's transportation fuels by ten (10) percent, by 2020. The LCFS is included in CARB's latest mobile source EMissions FACtors (EMFAC) inventory, and provides reductions for all vehicle classifications.

Energy GHG Emissions. As noted above, the GP 2025 contains policies encouraging green building principles in new development. In addition, California has adopted energy conservation measures and programs to reduce GHG emissions.

- Title 24. CCR Title 24 reduces emissions through energy conservation in new and remodeled buildings. Title 24 is revised by the California Building Standards Commission approximately every three years and each version includes improved standards for energy efficiency. For example, the 2016 California Building Standards Code (CCR Title 24) is the current version, and is approximately 28 percent more efficient than the previous 2013 Title 24 standards. Future development must comply with all Title 24 standards.

- California Green Building Code Standards. CALGreen is the first statewide mandatory green building code and significantly raises the minimum environmental standards for construction of new buildings in California. The Mandatory provisions in CALGreen would reduce the use of volatile organic compound (VOC) emitting materials, strengthen water conservation, and require construction waste recycling. Future development must comply with all CALGreen standards for new development.

- Renewable Portfolio Standard. Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107 and expanded in 2011 under Senate Bill 2, California's Renewables Portfolio Standard (RPS) is one of the country's most ambitious renewable energy standards. The RPS program requires investor-owned utilities (IOUs), electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020. RPU, the City's electric utility provider is required to comply with the RPS. According to the City's CAP, the City has committed to surpassing this goal to increase its RPS to 40 percent by 2035. As such, future development would reduce GHG emissions from electricity consumption under the RPS.

Solid Waste Reduction. Future development must comply with AB 939, which mandates recycling and composting services to reduce solid waste (i.e., divert/recycle solid waste generated during project operations) by at least 50 percent. Waste Management of the Inland Empire has developed a variety of recycling programs to comply with AB 939 legislation. Effective recycling within the Project area (in compliance with AB 939) would reduce energy use associated with the recycling process, while simultaneously reducing GHG emissions.

It is noted that operations associated with future development would occur in incremental phases over time based upon numerous factors, including market demand, and economic and planning considerations. Quantifying individual future development's GHG emissions is not possible due to project-level variability and uncertainties concerning locations, detailed site plans, etc., among other factors, which are presently unknown. Since these factors can vary so widely (and individual project development would occur over time dependent upon numerous factors), quantifying precise GHG emissions and impacts would be impractical. Depending on how development proceeds, GHG emissions associated with future development could exceed SCAQMD thresholds of significance.

As previously noted, SCAQMD has identified a tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency. The SCAQMD's significance thresholds would be relied upon to determine the significance level of a future project's impacts associated with GHG emissions. With the specified tiered approach, each future development would be compared to the requirements of each tier sequentially and would result in a less than significant impact if it complies with any tier. Future multi-family residential developments exceeding SCAQMD's tiered-approach requirements and thresholds of significance must conduct a project-level assessment of GHG emissions

impacts (see proposed Mitigation Measure GHG-1). Future development would be required to mitigate GHG emissions to below SCAQMD's thresholds of significance. A future development with GHG emissions below SCAQMD thresholds is considered to have a less than significant impact. Future mixed-use developments (not proposed multifamily residential by right uses) would be evaluated at the project-level, when individual projects are implemented. Future mixed-use developments would be subject to review under CEQA.

Although implementation of GP 2025 policies would result in reduced GHG emissions, GHG reductions from these policies have not been quantified, as discussed. Additionally, the City's CAP measures are primarily related to State, regional, and City-wide activities. However, future development accommodated through Project implementation includes mixed-uses, consistent with CAP measure T-7. Currently, there are no specific development proposals associated with the proposed Project. Therefore, the degree and extent of future Project compliance with the GP 2025 policies and implementation measures is yet unknown, project-specific details necessary to calculate emission reductions are not available at this time. Future development would be subject to compliance with applicable GP 2025 policies, as well as proposed Mitigation Measure GHG-1 to reduce GHG emissions to below SCAQMD significance thresholds. Nonetheless, the Project's GHG emissions would exceed SCAQMD thresholds as indicated in DEIR Table 4.4-2. In addition, due to the forecast population growth and GHG emissions associated with future development, and the lack of specificity of future development, impacts associated with GHG emissions would remain significant and unavoidable after implementation of mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project.

The following mitigation measures will be implemented:

GHG-1 GHG Emissions. Prior to demolition, grading, or building permit approval, and in accordance with SCAQMD's promulgated methodology protocols, a Greenhouse Gas Emissions Assessment shall be prepared for multi-family residential developments that would exceed SCAQMD's tiered-approach requirements and the following SCAQMD thresholds of significance (or those in place at the time of the development application). Future development shall mitigate GHG emissions to below SCAQMD's thresholds of significance.

- Residential Uses: 3,000 metric tons of CO2 equivalent per year (MTCO2eq/yr); or
- Efficiency-Based (through Year 2020): 4.8 MTCO2eq per service population (SP) per year; or
- Efficiency-Based (post Year 2020): 3.0 MTCO2eq/SP/year.

2. Consistency with Applicable GHG Plans, Policies, or Regulations

Threshold: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.4-18 to 4.4-20)

Explanation: As discussed in DEIR Section 4.4, the City adopted its CAP in January 2016, which contains GHG emissions inventory, projections, goals, reductions measures, and actions to reduce Citywide GHG emissions and achieve the City's 2020 and 2035 reduction targets. In the CAP, the City has committed to a 26.4 percent reduction below the City's 2007 emissions baseline. The CAP includes numerous measures such as the following: replacing traffic and street lights with high efficiency bulbs; planting shade trees; providing financing incentives for energy and water efficiency improvements; implementing renewable energy on publicly owned property; bicycle infrastructure improvements; end of trip facilities; transportation demand management strategies; traffic signal coordination; jobs-housing balance improvements; and encouraging mixed use development; among others. The CAP primarily utilizes City

measures and policy decisions to achieve the GHG reduction target. A large portion of the reductions would also occur from implementation of regional and State programs such as the Renewables Portfolio Standard, California Building Energy Efficiency Standards (Title 24), the Western Riverside Council of Governments (WRCOG) Home Energy Renovation Opportunity (HERO) program, Pavley Fuel Standards, Metrolink Expansions, and electric vehicle planning and infrastructure. It is noted the CAP does not include specific measures, reduction targets, or thresholds for individual development projects, although future development would experience reduced GHG emissions through compliance with CAP measures. Additionally, individual future development projects would include mixed use and infill residential uses that would help achieve the mixed use and jobs-housing balance CAP goals.

As shown in DEIR Table 4.4-2, future development would result in approximately 433,907.75 MTCO2eq/yr, which would exceed SCAQMD's 3,000 MTCO2eq/yr GHG threshold. Additionally, based on a service population (SP) of 38,791 persons (refer to DEIR Section 3.0), Project GHG emissions would be 11.19 MTCO2eq/SP/year, which exceeds the 4.8 MTCO2eq/SP/year and 3.0 MTCO2eq/SP/year thresholds. As discussed above, the GP 2025 includes policies that would indirectly reduce future development operational GHG emissions. Compliance with State-mandated programs/regulations (e.g., Title 24) would further aid in the reduction of future development operational GHG emissions. These measures are consistent with AB 32 Scoping Plan strategies, as well as CAP statewide goals and reduction measures to improve energy efficiency, reduce building energy consumption, and conserve natural resources. However, as the future developments' scale, types, construction schedules, project design features, etc., are unknown at this time, it would be highly speculative to calculate GHG emissions reductions. As such, it is impractical to determine whether future development would comply with the Riverside CAP reduction goals, measures, and actions. With the specified tiered approach (see discussion above), each future development would be compared to the requirements of each tier sequentially and would result in a less than significant impact if it complies with any tier. Future MFR developments exceeding SCAQMD's tiered-approach requirements and thresholds of significance must conduct a project-level assessment of GHG emissions impacts (see proposed Mitigation Measure GHG-1). Future development would be required to mitigate GHG emissions to below SCAQMD's thresholds of significance. A future development with GHG emissions below SCAQMD thresholds would be considered to have a less than significant impact. Future mixed-use developments (not proposed MFR by right uses) would be evaluated at the project-level, when individual projects are implemented. Future mixed-use developments would be subject to review under CEQA. However, given the magnitude of the Project's scope (future development of up to 11,715 DU and as much as 7.2 million SF of non-residential uses), and the potential for future development GHG emissions to exceed SCAQMD thresholds, a significant and unavoidable impact would occur concerning compliance with the City's CAP and a Statement of Overriding Considerations will be required should the City choose to approve the Project.

Refer to Mitigation Measure GHG-1 above.

C. LAND USE AND PLANNING

1. SCAG Land Use Plans, Policies, or Regulations

Threshold: Would the Project conflict with any applicable SCAG land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.6-5 to 4.6-7 and 4.6-25 to 4.6-28)

Explanation: As discussed in DEIR Section 4.6, the criteria for projects of statewide, regional, or areawide significance are outlined in CEQA Guidelines Sections 15125 and 15206. The Project satisfies CEQA Guidelines Section 15206(b)(1), which is "a proposed local general plan, element, or amendment thereof for which an EIR was prepared." As the Project satisfies CEQA Guidelines Section 15206(b)(1), it is considered regionally significant and must demonstrate its consistency with the 2016 RTP/SCS, which is established through consistency with the 2016 RTP/SCS Goals and Adopted Growth Forecasts.

2016 RTP/SCS GOALS

DEIR Table 4.6-1, *SCAG Consistency Analysis*, provides an analysis of Project consistency with the 2016 RTP/SCS Goals and Adopted Growth Forecasts. As demonstrated in DEIR Table 4.6-1, the Project is consistent with the 2016 RTP/SCS Goals and a less than significant impact would occur in this regard. Further, the GP 2025 includes several policies intended to assist the City in achieving SCAG's goals. In particular, the GP 2025 Land Use and Urban Design Element incorporates relevant policies to establish the overall policy direction for land use planning decisions in the City. This element works alongside the Housing Element to address housing/jobs balance objectives through the provision of housing for all income levels while providing a diverse collection of housing types, employment generating land uses, and opportunities for mixed-use development. For these reasons, the Project is consistent with the 2016 RTP/SCS Goals and a less than significant impact would occur.

ADOPTED GROWTH FORECASTS

SCAG Adopted Growth Forecasts are based on current GP 2025 growth forecasts. As indicated in DEIR Table 4.6-3, the candidate sites' existing GP 2025 development potential is approximately 3,472 DU and approximately 5.9 million SF of non-residential land uses.

The Project involves GP land use amendments, zone changes, and specific plan amendments to as many as 69 candidate sites, comprised of 303 parcels and totaling approximately 395 acres. DEIR Table 2-6, *Proposed General Plan Land Use Designations*, provides descriptions of the proposed land use designations, which include HDR, VHDR, MU-U, and MU-V. Table 4.6-7, *Candidate Sites Proposed GP Development Potential*, presents the candidate sites' development potential based upon the proposed land use designations and typical residential densities and non-residential intensities. The proposed GP land use designations are depicted on DEIR Exhibit 4.6-3, *Candidate Sites Proposed GP Land Use Designations*.

As indicated in DEIR Table 4.6-7, the candidate sites' development potential based on GP land use amendments to as many as 69 candidate sites is approximately 11,715 DU and approximately 7.2 million SF of non-residential land uses. As previously noted, SCAG Adopted Growth Forecasts are based on current GP 2025 development potential. A comparison of DEIR Table 4.6-3 and Table 4.6-7 indicate that future development of the candidate sites is anticipated to result in a net increase of as many as 8,243 DU and as much as 1.3 million SF of non-residential uses over current GP 2025 development potential. Therefore, Project implementation would cause SCAG Adopted Growth Forecasts to be exceeded, resulting in a significant and unavoidable impact; see also DEIR Table 4.6-1 and Section 5.3, *Growth-Inducing Impacts*. A Statement of Overriding Considerations would be required should the City choose to approve the Project. It is noted, however, the Project is proposed to accommodate the City's remaining RHNA allocation of 4,767 DU, which would be accomplished through various key actions, including Tool H-21, Rezoning Program. Tool H-21 involves Zone Changes (as well as General Plan and Specific Plan Amendments) to as many as 69 candidate sites; see DEIR Table 4.6-7. State law and SCAG mandate that Riverside accommodate their RHNA "fair share" of the region's housing needs for all income groups, which cannot be achieved without the Project's proposed General Plan Amendments, Zone Changes, and Specific Plan Amendments, and the future development. (DEIR pages 4.6-5 to 4.6-7 and 4.6-25 to 4.6-28)

There is no feasible mitigation for this impact.

D. NOISE

1. Long-Term Noise Impacts

Threshold: Would the Project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Would the Project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Finding: Significant Unavoidable Impact after implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.7-19 to 4.7-26)

Explanation:

EXISTING PLUS PROJECT CONDITION TRAFFIC NOISE IMPACTS

As discussed in DEIR Section 4.7, future development would generate increased traffic noise impacts in the Project area and surrounding roadways. DEIR Table 4.7-8, *Existing and Existing Plus Project Traffic Noise Levels*, outlines the future roadway noise levels in the Project area under Existing Plus Project Conditions. As shown in DEIR Table 4.7-8, under Existing Plus Project Conditions, noise levels at 100 feet from the centerline would range from approximately 62.3 dBA to 74.0 dBA, with the highest noise levels occurring along Van Buren Boulevard (north of Jurupa Avenue). As such, traffic noise levels under Existing Plus Project Conditions would likely exceed the "normally acceptable" land use compatibility thresholds (either 60 dB CNEL at single-family uses or 65 dB CNEL at multi-family residential uses) along Van Buren Boulevard and Alessandro Boulevard.

FUTURE PLUS PROJECT TRAFFIC NOISE IMPACTS

DEIR Section 4.9 analyzes a Future Plus Project scenario involving roadway conditions with the addition of ambient growth to Cumulative/Future (2040) and traffic generated from the future development.

DEIR Table 4.7-9, *Future and Future Plus Project Traffic Noise Levels*, outlines the future roadway noise levels in the Project area assuming future development occurs. As indicated in DEIR Table 4.7-9, noise levels at 100 feet from the centerline would range from approximately 62.0 dBA to 73.8 dBA under Future No Project Conditions. The highest noise levels under Future No Project Conditions would occur along Van Buren Boulevard (north of Jurupa Avenue). Similarly, under Future Plus Project Conditions, noise levels at 100 feet from the centerline would range from approximately 63.0 dBA to 74.0 dBA, with the highest noise levels occurring along Van Buren Boulevard (north of Jurupa Avenue). As such, traffic noise levels under Future Plus Project Conditions would likely exceed the "normally acceptable" land use compatibility standards.

TRAFFIC NOISE IMPACT CONCLUSION

Future development would be subject to compliance with relevant GP 2025 policies (i.e., Policy N-1.2, N-1.5, and N-2.1) intended to mitigate potential traffic noise impacts. Refer to DEIR Appendix E for the full text of these policies. All future development would also be subject to compliance with RMC Title 7, which sets forth interior and exterior noise standards for specific land uses and zoning. Future multifamily residential developments that cause a permanent increase in ambient noise levels of 3.0 dB or greater and a noise level that would exceed the applicable RMC Title 7 interior/exterior noise standard at the noise sensitive receptor would be required to conduct a project-level assessment of traffic noise impacts (see proposed Mitigation Measure NOI-4). Future developments would be required to mitigate traffic noise impacts for compliance with RMC Title 7 noise standards. Future mixed-use developments (not proposed multifamily residential by right uses) would be evaluated at the project-level, when individual projects are implemented. Future mixed-use developments would be subject to review under CEQA. Compliance with GP 2025 Policies N-1.2, N-1.5, and N-2.1, and proposed Mitigation Measure NOI-4, would minimize traffic noise impacts under Existing Plus Project Conditions and Future Plus Project Conditions. However, there are project-level variabilities and uncertainties concerning locations, detailed site plans, etc., among other factors, which are presently unknown. Since these parameters can vary so widely (and Project development would occur over time dependent upon market demand, economic, and planning considerations, among other factors), traffic noise impacts under Existing Plus Project Conditions and Future Plus Project Conditions would remain significant and unavoidable after implementation of mitigation. A Statement of Overriding Considerations would be required should the City choose to approve the Project.

LONG-TERM STATIONARY NOISE IMPACTS

Quantifying future development's project-specific, long-term stationary noise impacts is not possible due to project-level variability and uncertainties related to future individual projects concerning locations, detailed site plans, etc., among other factors, which are presently unknown. Since these parameters can vary so widely (and individual project development would occur over time dependent upon market demand, economic, and planning considerations, among other factors), quantifying precise stationary noise impacts would be impractical. Depending on how development proceeds, future development could generate noise levels exceeding 65 CNEL at an adjoining sensitive receptor. Future development would involve new residential and commercial mixed uses. Noise generally produced in commercial areas includes slow moving truck deliveries, parking areas, landscape maintenance, etc. These new uses could generate long-term noise levels exceeding 65 CNEL at the candidate sites' boundary and significantly impact an adjoining land use. Future development would be subject to compliance with relevant GP 2025 policies (i.e., Policy N-1.4, N-1.5, N-1.8, and N-2.1) intended to mitigate potential traffic noise impacts. Refer to DEIR Appendix E for the full text of these policies. In addition, future development would be required to comply with City, State and federal guidelines concerning noise abatement and insulation standards. This would ensure that noise levels near the candidate sites and surrounding areas are maintained within acceptable standards that prevent excessive disturbance, annoyance, or disruption.

RMC Title 7 interior/exterior noise standards would be relied upon to determine the significance level of a future project's stationary noise impact. Each future development would be compared to the standards and would result in a less than significant impact if compliance is achieved. Future multi-family residential developments exceeding the RMC Title 7 interior/exterior standards must conduct a project-level assessment of stationary noise impacts (see proposed Mitigation Measure NOI-4). Future development would be required to mitigate noise impacts to meet RMC Title 7 standards. A future development with stationary noise levels below RMC Title 7 interior/exterior noise standards is considered to have a less than significant impact. Future mixed-use developments (not proposed MFR by right uses) would be evaluated at the project-level, when individual projects are implemented. Future mixed-use developments would be subject to review under CEQA. Therefore, following compliance with Federal, State, and local standards and GP 2025 policies, and proposed Mitigation Measure NOI-4, Project implementation would result in a less than significant impact involving noise levels at the project boundary from stationary noise sources. (DEIR pages 4.7-19 to 4.7-26)

The following mitigation measures will be implemented:

NOI-4 Traffic and Stationary Source Noise Impacts. Prior to demolition, grading, or building permit approval, an Operational Noise Assessment shall be prepared for multi-family residential projects that would result in the following:

- Existing Plus Project and Future Plus Project Traffic Noise Impacts: A permanent increase in ambient noise levels of 3.0 dB or greater and a noise level that would exceed the following applicable Riverside Municipal Code Title 7 interior/exterior noise standards at the noise sensitive receptor (or those in place at the time of the development application).

- Stationary Noise Impacts: A noise level that would exceed the following applicable Riverside Municipal Code Title 7 interior/exterior noise standards at the noise sensitive receptor (or those in place at the time of the development application).

Future development would be required to mitigate noise impacts for compliance with RMC Title 7 noise standards.

Land Use	RMC Title 7 Noise Standards	
	Interior	Exterior
Residential	35 dBA (10 PM to 7 AM) 45 dBA (7 AM to 10 PM)	45 dBA (10 PM to 7 AM) 55 dBA (7 AM to 10 PM)
Office/Commercial	N/A	65 dBA (any time)
Industrial	N/A	70 dBA (any time)
Community Support	N/A	60 dBA (any time)
Public Recreation Facility	N/A	65 dBA (any time)
Non-urban	N/A	70 dBA (any time)
School	45 dBA (7 AM to 10 PM while school is in session)	N/A
Hospital	45 dBA (any time)	N/A
Source: *City of Riverside Municipal Code Title 7, Noise Control*.		

E. TRANSPORTATION AND TRAFFIC

1. Impacts on Automobile Circulation System

Threshold: Would the Project conflict with an applicable plan, ordinance, 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?

Finding: Significant Unavoidable Impact after Implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.9-20 to 4.9-38)

Explanation:

PROJECT TRAFFIC VOLUMES

The analysis presented in DEIR Impact 4.9-1 is based on the City of Riverside Housing Element Transportation Impact Study (Fehr & Peers, August 29, 2017); refer to DEIR Appendix J, *Traffic Impact Analysis*. To determine the number of trips generated by future development accommodated through Project implementation, Fehr & Peers applied a five-step approach.

1. The Project socioeconomic data (SED) was added to the base year Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan (RTP) model.

2. Two model runs were conducted: the original SCAG base year model; and the modified base year model (with proposed Project SED).

3. The difference in the number of trips on roadways within the City between the two model runs was calculated using methods consistent with the National Cooperative Highway Research Program (NCHRP) Report 255. This difference method was used to identify the traffic growth. The difference between the two model runs represents the "Project only" trips.

4. Project only volumes were then added to the counts collected for this analysis.

5. The growth was reviewed, and there was no allowance given for negative growth, as a conservative approach.

The trip generation estimates associated with the Project's anticipated net increase of as many as 11,649 DU and as much as 5,891,933 SF of non-residential uses over existing conditions were calculated by summing the trips out of every Traffic Analysis Zone (TAZ) within the City of Riverside for both base year no Project and base year with Project model runs. Based on the approach outlined above, the estimated number of average daily traffic (ADT) counts that would be generated by future development is approximately 145,401 trips.

EXISTING (2017) PLUS PROJECT CONDITIONS

This scenario involves the addition of the ADT generated by future development to existing (2017) conditions. This scenario is used to evaluate the net change in traffic conditions resulting from future development, and identify the potential traffic impacts.

Existing (2017) Plus Project Traffic Volumes

To determine Existing (2017) Plus Project volumes, Project only volumes were added to the collected traffic counts. DEIR Exhibit 4.9-5, *Existing (2017) Plus Project Roadway Segment Forecasts*, shows the Existing (2017) Plus Project volumes used for this analysis.

Existing (2017) Plus Project Roadway Segment Operations

Roadway segment forecasts and LOS for Existing (2017) Plus Project Conditions are provided on DEIR Exhibit 4.9-5 and LOS operations are summarized in DEIR Table 4.9-4, Existing (2017) Plus Project Roadway Segment LOS. As indicated in DEIR Table 4.9-4, the following roadway segments would operate below the acceptable LOS D threshold under Existing (2017) Plus Project Conditions:

- #2 - Alessandro Boulevard (North of Via Vista Drive);
- #4 - Arlington Avenue (East of Brockton Avenue);
- #8 - Indiana Avenue (East of Harrison Street);
- #9 - Jackson Street (North of Indiana Avenue);
- #28 - Van Buren Boulevard (South of Cleveland Avenue);
- #29 - Van Buren Boulevard (West of Washington Street);
- #30 - Van Buren Boulevard (West of Wood Road);
- #31 - Van Buren Boulevard (North of Arlington Avenue); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Existing (2017) Plus Project Conditions

DEIR Table 4.9-5, Existing (2017) Plus Project Impact Roadway Segment Impact Summary, identifies the roadway segments impacted by the addition of Project traffic, based on the criteria discussed in DEIR Section 4.9.3, *Impact Thresholds and Significance Criteria*, for Existing (2017) Plus Project Conditions. As indicated in DEIR Table 4.9-5, based on the significance criteria, traffic generated by future development would impact the following roadway segments under Existing (2017) Plus Project conditions:

- #2 - Alessandro Boulevard (North of Via Vista Drive);
- #4 - Arlington Avenue (East of Brockton Avenue);
- #8 - Indiana Avenue (East of Harrison Street);
- #9 - Jackson Street (North of Indiana Avenue);
- #28 - Van Buren Boulevard (South of Cleveland Avenue);
- #29 - Van Buren Boulevard (West of Washington Street);
- #30 - Van Buren Boulevard (West of Wood Road);
- #31 - Van Buren Boulevard (North of Arlington Avenue); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Existing (2017) Plus Project Conditions Mitigation Measures

As concluded above, the addition of Project traffic would impact nine roadway segments under Existing (2017) Plus Project Conditions. The DEIR incorporates the following discussion concerning mitigation for the Project's impacts on these roadway segments, and evaluates the significance of each impact.

- #2 - Alessandro Boulevard (North of Via Vista Drive). Future development would add traffic to the roadway segment already operating at LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction). However, this roadway is already fully improved according to its GP 2025 designation. As shown on the image provided in Appendix J Section 9.2.2.1, the roadway has physical limitations and lacks available ROW, given there are buildings/development (i.e., residential uses) on both sides of the roadway. Therefore, the recommended improvement is considered infeasible, and this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project). This finding is consistent with the City of GP FPEIR conclusion. This impact is estimated to be triggered at 50 percent buildout of the Project (or approximately 5,825 DU and approximately 2,945,967 SF of non-residential uses).

- #4 - Arlington Avenue (East of Brockton Avenue). Future development would add traffic to the roadway segment already operating at LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction, from four to six lanes). This improvement is consistent with the SCAG 2016 RTP funded improvement list. As shown on the image provided in Appendix J Section 9.2.2.1, repurposing some of the existing pavement widths and existing landscaping would accommodate the proposed widening. As such, the recommended improvement is considered feasible. Implementation of this mitigation would improve operations to LOS C or better. This recommended improvement is a Western Riverside Association of Government (WRCOG) Transportation Uniform Mitigation Fee (TUMF) project. Therefore, payment of TUMFs, in compliance with RMC Chapter 16.68 requirements, would reduce this impact to less than significant; see proposed Mitigation Measure TRA-1. This impact is estimated to be triggered at 40 percent buildout of the Project (or approximately 4,660 DU and approximately 2,356,773 SF of non-residential uses).

  It is noted, a bikeway exists along this roadway segment and should be accounted for as part of the proposed improvement. This segment is also part of a transit route and existing access should not be disrupted, as part of the proposed improvement. Refer to DEIR Impact 4.9-5 for a discussion concerning potential impacts to bikeways and transit.

- #8 - Indiana Avenue (East of Harrison Street). Future development would add traffic that would degrade this roadway segment from acceptable operations to LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction, from two to four lanes). This improvement is consistent with the GP 2025 designation. However, as shown on the image provided in DEIR Appendix J Section 9.2.2.1, the roadway has physical limitations and lacks available ROW, given there are buildings/development (i.e., commercial and residential uses) on both sides of the roadway. Therefore, the recommended improvement is considered infeasible, and this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project). It is noted that this recommended improvement is not a TUMF facility. This impact is estimated to be triggered at 65 percent buildout of the Project (or approximately 7,572 DU and approximately 3,829,756 SF of non-residential uses).

- #9 - Jackson Street (North of Indiana Avenue). Future development would add traffic that would degrade this roadway segment from acceptable operations to LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction, from two to four lanes. This improvement is consistent with the GP 2025 designation. As shown on the image provided in DEIR Appendix J Section 9.2.2.1, the 40-foot

curb-to-curb width and removal of a sidewalk across the structure could potentially fit four lanes for vehicles. However, this improvement would conflict with the City of Riverside Bicycle Master Plan (Alta Planning and Design, adopted May 22, 2007), which indicates that a bikeway is proposed along this roadway segment (refer to DEIR Exhibit 4.9-3, E*xisting and Proposed Bicycle Facilities*) and improvements across the structure would require Caltrans approval. As such, the recommended improvement is considered infeasible. Given the conflict with the City's Bike Master Plan, and since the City cannot guarantee that Caltrans would approve the recommended improvement, this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project). This impact is estimated to be triggered at 90 percent buildout of the Project (or approximately 10,484 DU and approximately 5,302,740 SF of non-residential uses).

- #28 - Van Buren Boulevard (South of Cleveland Avenue). Future development would add traffic to the roadway segment already operating at LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction, from four to six lanes). This improvement is consistent with the GP 2025 designation. As shown on the image provided in DEIR Appendix J Section 9.2.2.1, repurposing some of the existing pavement widths and existing landscapes would accommodate the proposed widening. As such, the recommended improvement is considered feasible. Implementation of this mitigation would improve operations to LOS C or better. This is a WRCOG TUMF project. Therefore, payment of TUMFs in compliance with RMC Chapter 16.68 requirements would reduce this impact to less than significant; see proposed Mitigation Measure TRA-1. This impact is estimated to be triggered at 20 percent buildout of the Project (or approximately 2,330 DU and approximately 1,178,387 SF of non-residential uses).

  It is noted, a bikeway is proposed along this roadway segment and should be accounted for as part of the proposed improvement. This segment is also part of a transit route and existing access should not be disrupted, as part of the proposed improvement. Refer to DEIR Impact 4.9-5 concerning potential impacts to bikeways and transit.

- #29 - Van Buren Boulevard (West of Washington Street). Future development would add traffic that would degrade this roadway segment from acceptable operations to LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction, from four to six lanes). This improvement is consistent with the SCAG 2016 RTP funded improvement list. As shown on the image provided in DEIR Appendix J Section 9.2.2.1, repurposing some of the existing landscaping and existing pavement widths would accommodate the proposed roadway widening. As such, the recommended improvement is considered feasible. Implementation of this mitigation would improve operations to LOS C or better. This is a WRCOG TUMF project. Therefore, payment of TUMFs in compliance with RMC Chapter 16.68 requirements would reduce this impact to less than significant; see proposed Mitigation Measure TRA-1. This impact is estimated to be triggered at 60 percent buildout of the Project (or approximately 6,989 DU and approximately 3,535,160 SF of non-residential uses).

  It is noted, a bikeway is proposed along this roadway segment and should be accounted for as part of the proposed improvement. This segment is also part of a transit route and existing access should not be disrupted, as part of the proposed improvement. Refer to DEIR Impact 4.9-5 for a discussion concerning potential impacts to bikeways and transit.

- #30 - Van Buren Boulevard (West of Wood Road). Future development would add traffic to the roadway segment already operating at LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction, from four to six lanes). This improvement is consistent with the SCAG 2016 RTP funded improvement list. As shown on the image provided in DEIR Appendix J Section 9.2.2.1, repurposing some of the existing pavement widths and existing landscaping would accommodate the proposed roadway widening. As such, the recommended improvement is considered feasible. Implementation of this

mitigation would improve operations to LOS C or better. This is a WRCOG TUMF project. Therefore, payment of TUMFs in compliance with RMC Chapter 16.68 would reduce this impact to less than significant; see proposed Mitigation Measure TRA-1. This impact is estimated to be triggered at 35 percent buildout of the Project (or approximately 4,077 DU and approximately 2,062,177 SF of non-residential uses).

It is noted, a bikeway exists along this roadway segment and should be accounted for as part of the proposed improvement. This segment is also part of a transit route and existing access should not be disrupted, as part of the proposed improvement. Refer to DEIR Impact 4.9-5 for a discussion concerning potential impacts to bikeways and transit.

- #31 - Van Buren Boulevard (North of Arlington Avenue). Future development would add traffic to this roadway segment already operating at LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction). However, this roadway is already fully improved according to its GP 2025 designation. As shown on the image provided in DEIR Appendix J Section 9.2.2.1, repurposing some of the existing pavement width and existing landscaping would accommodate the proposed widening. Therefore, the recommended improvement is considered feasible. However, this impact is considered significant and unavoidable given the roadway is already fully improved (a Statement of Overriding Considerations would be required should the City choose to approve the Project). This finding is consistent with GP FPEIR conclusions. This impact is estimated to be triggered at 25 percent buildout of the Project (or approximately 2,912 DU and approximately 1,472,983 SF of non-residential uses).

- #33 - Van Buren Boulevard (North of Jurupa Avenue). Future development would add traffic to this roadway segment already operating at LOS E. To mitigate this impact under Existing (2017) Plus Project Conditions, the roadway would require two additional lanes (one in each direction, from four to six lanes). As shown on the image provided in DEIR Appendix J Section 9.2.2.1, there is available ROW on both sides of the roadway. The recommended improvement is considered feasible. This is a WRCOG TUMF project. Therefore, payment of TUMFs in compliance with RMC Chapter 16.68 would reduce this impact to less than significant; see proposed Mitigation Measure TRA-1. This impact is estimated to be triggered at 20 percent buildout of the Project (or approximately 2,330 DU and 1,178,387 SF of non-residential uses).

Impact Summary. In summary, under Existing (2017) Plus Project Conditions, impacts to the following roadway segments would be reduced to less than significant (operations would improve to LOS C or better), with mitigation incorporated (e.g., proposed Mitigation Measure TRA-1):

- #4 - Arlington Avenue (East of Brockton Avenue);
- #28 - Van Buren Boulevard (South of Cleveland Avenue);
- #29 - Van Buren Boulevard (West of Washington Street);
- #30 - Van Buren Boulevard (West of Wood Road);
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Given the recommended improvements would be infeasible or the roadway is already fully improved according to its GP 2025 designation, impacts to the following roadway segments would be considered significant and unavoidable, under Existing (2017) Plus Project Conditions:

- #2 - Alessandro Boulevard (North of Via Vista Drive);
- #8 - Indiana Avenue (East of Harrison Street);
- #9 - Jackson Street (North of Indiana Avenue); and
- #31 - Van Buren Boulevard (North of Arlington Avenue).

To minimize potential impacts resulting from increases in traffic volumes, all future development would be subject to compliance with GP 2025 policies intended to ensure an effective circulation system, including

Policy CCM-2.3, CCM-5.2, and CCM-5.4, among others. Refer to DEIR Appendix E for the full text of these policies.

Additionally, the appropriate City of Riverside TIA Guidelines would be employed, among other procedures, to evaluate site-specific LOS impacts. The City's significance thresholds would be relied upon to determine the significance level of a future project's individual impact upon LOS. Future development that satisfies the criteria outlined in proposed Mitigation Measure TRA-2 (e.g., that generates 100 or more new peak hour vehicle trips) would be required to conduct a Traffic Operations Assessment and mitigate LOS impacts to below the City's thresholds of significance, to the extent feasible. A project that does not meet the criteria outlined in proposed Mitigation Measure TRA-2 is considered to have a less than significant impact on traffic. Future mixed-use developments (not proposed MFR by right uses) would be evaluated at the project-level and subject to review under CEQA, when individual projects are implemented. Despite implementation of proposed Mitigation Measures TRA-1 and TRA-2, and compliance with the specified GP 2025 policies, the addition of Project traffic would result in significant and unavoidable impacts under Existing (2017) Plus Project Conditions.

CUMULATIVE/FUTURE (2040) NO PROJECT CONDITIONS

This scenario includes the addition of ambient growth from existing volumes to year 2040.

Future Traffic Forecasts

Future volumes for Cumulative/Future (2040) No Project Conditions were developed using the SCAG 2016 RTP future model (corresponding to a 2040 development horizon) using a five-step approach.

1. The 2040 SED was reviewed to verify it included reasonably foreseeable projects.

2. The model SED was updated to include post GP 2025-adoption General Plan Amendments, and approved and pending projects provided by the County, Riverside, and neighboring cities. These lists are included in Appendix C of DEIR Appendix J.

3. A model run of the updated future model was conducted.

4. The difference method (NCHRP 255) was applied from the unmodified base year model to the updated future model to identify growth in traffic associated with ambient growth in the study area.

5. The estimated growth was reviewed and forecasted negative growth was not allowed to ensure that a conservative assumption was made in identifying Project impacts. In cases where the future year model volumes were less than base year model volumes, the Cumulative/Future (2040) No Project forecasts were manually overridden and assumed to be the same as Existing Conditions counts, as a conservative measure.

Forecasting worksheets are provided in in Appendix C of DEIR Appendix J and Forecast volumes used in this analysis are shown on DEIR Exhibit 4.9-6, *Cumulative/Future (2040) No Project Roadway Segment Forecasts*.

Future Roadway Improvements

The following study roadway segment improvements are funded through the SCAG 2016 RTP and were assumed in place for the Cumulative/Future (2040) No Project scenario:

- Arlington Avenue (from Magnolia Avenue to Alessandro Boulevard): Widened from four to six lanes (RTP ID 3A01WT112).

- Magnolia Avenue (from Buchanan Street to Banbury Drive): Widened from four to six lanes (RTP ID 3AL304).

- Van Buren Boulevard (from Mockingbird Canyon Road to Wood Road): Widened from four to six lanes (RTP ID 3A01WT199).

Cumulative/Future (2040) No Project Roadway Segment Operations

Roadway segment forecasts and LOS operations for Cumulative/Future (2040) No Project Conditions are summarized in Table 4.9-6, Cumulative/Future (2040) No Project Roadway Segment LOS. As indicated in Table 4.9-6, the following roadway segments would operate below the acceptable LOS D threshold under Cumulative/Future (2040) No Project Conditions:

- #1 - Alessandro Boulevard (East of Mission Grove Parkway)
- #2 - Alessandro Boulevard (North of Via Vista Drive)
- #3 - Alessandro Boulevard (West of Sycamore Canyon Boulevard)
- #28 - Van Buren Boulevard (South of Cleveland Avenue)
- #33 - Van Buren Boulevard (North of Jurupa Avenue)

CUMULATIVE/FUTURE (2040) PLUS PROJECT CONDITIONS

This scenario analyzes the roadway conditions with the addition of ambient growth to Cumulative Year 2040 and traffic generated from the proposed Project.

Future Traffic Volumes

Future traffic volumes for Cumulative/Future (2040) Plus Project Conditions were developed using the SCAG 2016 RTP future model (corresponding to a 2040 development horizon) using a five-step approach.

1. The Project socioeconomic data (SED) was added to the updated future year SCAG 2016 RTP model used for Cumulative/Future (2040) No Project forecasting.

2. A model run of the modified future model was conducted.

3. The difference method (NCHRP 255) was applied between the updated future model and the modified future model to identify the traffic growth.

4. The traffic growth was added to the Cumulative/Future (2040) No Project Forecasts.

5. The estimated traffic growth was reviewed and forecasted negative growth was not allowed to ensure that a conservative assumption was made in identifying Project impacts. In cases where the base year growth associated with the Project growth was higher than the future year growth associated with the Project, the base year growth was used to represent "Project trips" as an additional conservative measure.

Forecasting worksheets are provided in Appendix C of DEIR Appendix J. Forecast volumes used in this analysis are shown on DEIR Exhibit 4.9-7, *Cumulative/Future (2040) Plus Project Roadway Segment Forecasts*.

Future Roadway Improvements

The same future roadway improvements assumed in Cumulative/Future (2040) No Project Conditions were assumed in this scenario.

Cumulative/Future (2040) Plus Project Roadway Segment Operations

Roadway segment forecasts and LOS operations for Cumulative/Future (2040) Plus Project Conditions are summarized in DEIR Table 4.9-7, *Cumulative/Future (2040) Plus Project Roadway Segment LOS*. As

indicated in DEIR Table 4.9-7, the following roadway segments would operate below the acceptable LOS D threshold under Cumulative/Future (2040) Plus Project Conditions:

- #1 - Alessandro Boulevard (East of Mission Grove Parkway);
- #2 - Alessandro Boulevard (North of Via Vista Drive);
- #3 - Alessandro Boulevard (West of Sycamore Canyon Boulevard);
- #8 - Indiana Avenue (East of Harrison Street);
- #9 - Jackson Street (North of Indiana Avenue);
- #28 - Van Buren Boulevard (South of Cleveland Avenue);
- #31 - Van Buren Boulevard (North of Arlington Avenue); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Cumulative/Future (2040) Plus Project Conditions

DEIR Table 4.9-8, *Cumulative/Future (2040) Plus Project Impact Roadway Segment Impact Summary*, identifies the roadway segments impacted by the addition of Project traffic, based on the criteria set forth in Section 3-2, for Cumulative/Future (2040) Plus Project Conditions.

- #1 - Alessandro Boulevard (East of Mission Grove Parkway)
- #2 - Alessandro Boulevard (North of Via Vista Drive)
- #3 - Alessandro Boulevard (West of Sycamore Canyon Boulevard)
- #8 - Indiana Avenue (East of Harrison Street)
- #9 - Jackson Street (North of Indiana Avenue)
- #28 - Van Buren Boulevard (South of Cleveland Avenue)
- #31 - Van Buren Boulevard (North of Arlington Avenue)
- #33 - Van Buren Boulevard (North of Jurupa Avenue)

As indicated in DEIR Table 4.9-8, based on the significance criteria, traffic generated by future development would impact the following roadway segments under Cumulative/Future (2040) Plus Project conditions:

- #1 Alessandro Boulevard (East of Mission Grove Parkway);
- #2 - Alessandro Boulevard (North of Via Vista Drive);
- #3 Alessandro Boulevard (West of Sycamore Canyon Boulevard);
- #8 - Indiana Avenue (East of Harrison Street);
- #9 - Jackson Street (North of Indiana Avenue);
- #28 - Van Buren Boulevard (South of Cleveland Avenue);
- #31 - Van Buren Boulevard (North of Arlington Avenue); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Cumulative/Future (2040) Plus Project Conditions Mitigation Measures

As concluded above, the addition of Project traffic would impact eight roadway segments under Future (2040) Plus Project Conditions. The following discussion addresses mitigation for the Project's impacts on these roadway segments, and evaluates the significance of each impact.

- #1 - Alessandro Boulevard (East of Mission Grove Parkway). Future development would add traffic to the roadway segment already operating at LOS E. To mitigate this impact under Future (2040) Plus Project Conditions, the roadway would require two additional lanes, one in each direction. However, this roadway is already fully improved according to its GP 2025 designation. As shown on the image provided in DEIR Appendix J Section 9.2.2.1, the roadway has physical limitations and lacks available ROW, because there are buildings/development (i.e., commercial uses) on both sides of the roadway. Therefore, the recommended improvement is considered

infeasible, and this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project).

- #2 - Alessandro Boulevard (North of Via Vista Drive). As concluded under the Existing (2017) Plus Project Conditions Mitigation Measures Section above, the recommended improvement is considered infeasible. Therefore, under Future (2040) Plus Project Conditions, this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project).

- #3 - Alessandro Boulevard (West of Sycamore Canyon Boulevard). Future development would add traffic to the roadway segment already operating at LOS E. To mitigate this impact under Future (2040) Plus Project Conditions, the roadway would require two additional lanes, one in each direction. However, this roadway is already fully improved according to its GP 2025 designation. As shown on the image provided in DEIR Appendix J Section 9.2.2.1, the roadway has physical limitations and lacks available ROW, given there are buildings/development (i.e., commercial uses) on the north side of the roadway and open space on the south side of the roadway (widening has potential to impact sensitive species and wetlands). Therefore, the recommended improvement is considered infeasible, and this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project).

- #8 - Indiana Avenue (East of Harrison Street). As concluded under the Existing (2017) Plus Project Conditions Mitigation Measures Section above, the recommended improvement is considered infeasible. Therefore, under Future (2040) Plus Project Conditions, this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project).

- #9 - Jackson Street (North of Indiana Avenue). As concluded under the Existing (2017) Plus Project Conditions Mitigation Measures Section above, the recommended improvement is considered infeasible. Therefore, under Future (2040) Plus Project Conditions, this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project).

- #28 - Van Buren Boulevard (South of Cleveland Avenue). As concluded under the Existing (2017) Plus Project Conditions Mitigation Measures Section above, the recommended improvement is considered feasible. This is a WRCOG TUMF project. Therefore, under Future (2040) Plus Project Conditions, payment of TUMFs in compliance with RMC Chapter 16.68 requirements would reduce this impact to less than significant; see proposed Mitigation Measure TRA-1.

- #31 - Van Buren Boulevard (North of Arlington Avenue). As concluded under the Existing (2017) Plus Project Conditions Mitigation Measures Section above, the recommended improvement is considered infeasible. Therefore, under Future (2040) Plus Project Conditions, this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project).

- #33 - Van Buren Boulevard (North of Jurupa Avenue). Future development would add traffic to this roadway segment already operating at LOS E. As discussed under the Existing (2017) Plus Project Conditions Mitigation Measures Section above, the recommended improvement involved two additional lanes (one in each direction, from four to six lanes). To mitigate the impact, under Future (2040) Plus Project Conditions, the roadway would require two additional lanes (one in each direction, from six to eight lanes), which would be consistent with its GP 2025 designation. Although this is a TUMF facility, WRCOG TUMF would only fund two additional lanes (one in each direction, from four to six lanes), as discussed under the Existing (2017) Plus Project Conditions Mitigation Measures Section above. Therefore, to mitigate impacts under Cumulative/Future (2040) Plus Project Conditions, future development would be responsible for their fair share contribution for the two additional lanes not funded by WRCOG TUMF. However,

since no fee program is in place to guarantee the remaining funding for the additional widening, this impact is considered significant and unavoidable (a Statement of Overriding Considerations would be required should the City choose to approve the Project). This finding is consistent with the GP FPEIR conclusions.

Impact Summary. In summary, under Cumulative/Future (2040) Plus Project Conditions, future development would be required to pay their fair share of the transportation improvements identified as Project mitigation. Impacts to the following roadway segment would be reduced to less than significant (operations would improve to LOS C or better), with mitigation incorporated (e.g., proposed Mitigation Measure TRA-1):

- #28 - Van Buren Boulevard (South of Cleveland Avenue).

Given the recommended improvements would be infeasible or the roadway is already fully improved according to its GP 2025 designation, impacts to the following roadway segments would be considered significant and unavoidable, under Cumulative/Future (2040) Plus Project Conditions:

- #1 Alessandro Boulevard (East of Mission Grove Parkway);
- #2 - Alessandro Boulevard (North of Via Vista Drive);
- #3 Alessandro Boulevard (West of Sycamore Canyon Boulevard);
- #8 - Indiana Avenue (East of Harrison Street);
- #9 - Jackson Street (North of Indiana Avenue);
- #31 - Van Buren Boulevard (North of Arlington Avenue); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

To minimize potential impacts resulting from increases in traffic volumes, all future development would be subject to compliance with GP 2025 policies intended to ensure an effective circulation system, including Policy CCM-2.3, CCM-5.2, and CCM-5.4, among others. Refer to DEIR Appendix E for the full text of these policies.

Additionally, the appropriate City of Riverside TIA Guidelines would be employed, among other procedures, to evaluate site-specific LOS impacts. The City's significance thresholds would be relied upon to determine the significance level of a future project's individual impact upon LOS. Future development that satisfies the criteria outlined in proposed Mitigation Measure TRA-2 (e.g., that generates 100 or more new peak hour vehicle trips) would be required to conduct a Traffic Operations Assessment and mitigate LOS impacts to below the City's thresholds of significance, to the extent feasible. A project that does not meet the criteria outlined in proposed Mitigation Measure TRA-2 is considered to have a less than significant impact on traffic. Future mixed-use developments (not proposed multifamily residential by right uses) would be evaluated at the project-level and subject to review under CEQA, when individual projects are implemented. Despite implementation of proposed Mitigation Measures TRA-1 and TRA-2, and compliance with the specified GP 2025 policies, the addition of Project traffic would result in significant and unavoidable impacts under Cumulative/Future (2040) Plus Project Conditions. (DEIR pages 4.9-20 to 4.9-38)

The following mitigation measures will be implemented:

TRA-1 Payment of Transportation Uniform Mitigation Fees (TUMF). To mitigate impacts to roadway levels of service and in accordance with RMC Chapter 16.68, Transportation Uniform Mitigation Fee, and specifically the provisions of RMC Section 16.68.060 concerning the procedures for the levy, collection, and disposition of fees, the project applicant shall pay the appropriate TUMF, to fund their proportionate fair share of the following roadway improvements:

Existing (2017) Plus Project Conditions

- #4 - Arlington Avenue (between Magnolia Avenue and SR-91 Southbound Ramps). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that exists along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.

- #28 - Van Buren Boulevard (between Rudicill Street and Mockingbird Canyon Road). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that is proposed along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.

- #29 - Van Buren Boulevard (between Mockingbird Canyon Road and Washington Street). Widened of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that is proposed along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.

- #30 - Van Buren Boulevard (between Washington Street and Wood Road). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that exists along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.

- #33 - Van Buren Boulevard (between Limonite Avenue and Jurupa Avenue). Widening of this roadway from four to six lanes (two additional lanes, one in each direction).

Cumulative/Future (2040) Plus Project Conditions

- #28 - Van Buren Boulevard (between Rudicill Street and Mockingbird Canyon Road). See mitigation described above.

TRA-2 Traffic Operations Assessment. Prior to grading and/or building permit approval, a Traffic Operations Assessment shall be required for future development that results in any one of the following:

1. Generates 100 or more new peak hour vehicle trips;

2. Does not conform with the City of Riverside's Access Management Guidelines;

3. The project site is located within 1,000 feet of a roadway or intersection where three or more reported vehicular accidents have occurred in a 12-month period, or five or more reported vehicular accidents in a 24-month period, and where the installation of traffic controls or improvements could reduce vehicular accidents; or

4. The closest intersection, if greater than 1,000 feet from the project site, or segment of roadway between the project and the closest intersection, have had three or more reported vehicular accidents in a 12-month period, or five or more reported vehicular accidents in a 24-month period, and where the installation of traffic controls or improvements could reduce vehicular accidents.

2. Compliance with Congestion Management Program

Threshold: Would the Project conflict with the Riverside County Congestion Management Plan, including but not limited to level of service standards and travel demand measures, or other standards established for designated roads or highways?

Finding: Significant Unavoidable Impact after Implementation of Mitigation, and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.9-38 to 4.9-42)

Explanation: The analysis presented in DEIR Impact 4.9-2 was conducted in accordance with the procedures outlined in the *2011 Riverside County Congestion Management Plan (CMP)*. The CMP requires that, when an environmental impact report is prepared for a project, traffic impact analyses be conducted for select regional facilities based on the volume of project traffic expected to use those facilities. The CMP locations in the study area are:

- Alessandro Boulevard;
- Arlington Avenue;
- La Sierra Avenue;
- Magnolia Avenue; and
- Van Buren Boulevard.

EXISTING (2017) PLUS PROJECT CONDITIONS

As indicated in DEIR Table 4.9-9, Existing (2017) Plus Project CMP Roadway Segment LOS, the following CMP roadway segments operate at LOS F under Existing (2017) Plus Project Conditions:

- #28 - Van Buren Boulevard (South of Cleveland Avenue);
- #30 - Van Buren Boulevard (West of Wood Road); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Based on the significance criteria, traffic generated by future development would cause significant impacts to the following CMP roadways under Existing (2017) Plus Project Conditions:

- #28 - Van Buren Boulevard (South of Cleveland Avenue);
- #30 - Van Buren Boulevard (West of Wood Road); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Under Existing (2017) Plus Project Conditions, impacts to the following CMP roadways would be reduced to less than significant (operations would improve to LOS C or better), with mitigation incorporated (see proposed Mitigation Measure TRA-1):

- #28 - Van Buren Boulevard (South of Cleveland Avenue);
- #30 - Van Buren Boulevard (West of Wood Road); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

To minimize potential impacts to CMP facilities resulting from increases in traffic volumes, all future development would be subject to compliance with GP 2025 Policy CCM-1.4. Policy CCM-1.4 supports improvement of the Van Buren Boulevard/I-215 Interchange and along the length of Van Buren Boulevard between I-215 and SR-91. Refer to DEIR Appendix E for the full text of these policies.

Additionally, the appropriate CMP methodology would be employed, among other procedures, to evaluate site-specific impacts to CMP facilities. The CMP criteria would be relied upon to determine the significance level of a future project's individual impact upon LOS. Future development that satisfies the criteria outlined in proposed Mitigation Measure TRA-2 (e.g., that generates 100 or more new peak hour vehicle trips) would be required to conduct a Traffic Operations Assessment. Future development would be required to mitigate LOS impacts to CMP facilities to below CMP thresholds of significance, to the extent feasible. Impacts for future development that does not meet the criteria outlined in proposed Mitigation Measure TRA-2 would be sufficiently mitigated through payment of TUMFs (see proposed Mitigation Measure TRA-3). Future mixed-use developments (not proposed multifamily residential by right uses) would be evaluated at the project-level and subject to CEQA review, when individual projects

are implemented. Despite implementation of proposed Mitigation Measures TRA-1 through TRA-3, and compliance with the specified GP 2025 policies, the addition of Project traffic would result in significant and unavoidable impacts under Existing (2017) Plus Project Conditions.

CUMULATIVE/FUTURE (2040) PLUS PROJECT CONDITIONS

As indicated in DEIR Table 4.9-10, Cumulative/Future (2040) Plus Project CMP Roadway Segment LOS, the results indicate that the following CMP roadway segments operate at LOS F during Cumulative/Future (2040) Plus Project Conditions:

- #28 - Van Buren Boulevard (South of Cleveland Avenue)
- #33 - Van Buren Boulevard (North of Jurupa Avenue)

Based on the significance criteria, traffic generated by future development would cause significant impacts to the following CMP roadway under Cumulative/Future (2040) Plus Project Conditions:

- #28 - Van Buren Boulevard (South of Cleveland Avenue); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Under Cumulative/Future (2040) Plus Project Conditions, impacts to the following CMP roadway would be reduced to less than significant (operations would improve to LOS C or better), with mitigation incorporated (see proposed Mitigation Measure TRA-1):

- #28 - Van Buren Boulevard (South of Cleveland Avenue).

Given the recommended improvement would be infeasible, impacts to the following CMP roadway segment would be considered significant and unavoidable, under Cumulative/Future (2040) Plus Project Conditions:

- #33 - Van Buren Boulevard (North of Jurupa Avenue).

To minimize potential impacts to CMP facilities resulting from increases in traffic volumes, all future development would be subject to compliance with GP 2025 Policy CCM-1.4. Additionally, the appropriate CMP methodology would be employed, among other procedures, to evaluate site-specific impacts to CMP facilities. The CMP criteria would be relied upon to determine the significance level of a future project's individual impact upon LOS. Future development that satisfies the criteria outlined in proposed Mitigation Measure TRA-2 (e.g., that generates 100 or more new peak hour vehicle trips) would be required to conduct a Traffic Operations Assessment. Future development would be required to mitigate LOS impacts to CMP facilities to below CMP thresholds of significance, to the extent feasible. Impacts for future development that does not meet the criteria outlined in proposed Mitigation Measure TRA-2 would be sufficiently mitigated through payment of TUMFs (see proposed Mitigation Measure TRA-3). Future mixed-use developments (not proposed multifamily residential by right uses) would be evaluated at the project-level and subject to CEQA review, when individual projects are implemented. Despite implementation of proposed Mitigation Measures TRA-1 through TRA-3, and compliance with the specified GP 2025 policies, the addition of Project traffic would result in significant and unavoidable impacts under Cumulative/Future (2040) Plus Project Conditions.

Mitigation Measures TRA-1 and TRA-2 above and the following mitigation measure will be implemented:

TRA-3 Riverside County Congestion Management Program (CMP). Payment of Transportation Uniform Mitigation Fee (TUMF) shall be required prior to issuance of grading and/or building permits, which mitigates potentially significant traffic/circulation impacts to CMP facilities.

4.4 Findings Regarding Cumulative Impacts

Consistent with CEQA's requirements, the EIR includes an analysis of cumulative impacts, which include the impacts of the Project plus all other pending or approved projects within the affected area for each resource. To determine the Project's potential cumulative impacts, the DEIR incorporates both a summary of projections contained in an adopted plan (i.e., GP 2025) and a list of projects producing related or

cumulative impacts; refer to DEIR Section 3.2, *General Plan 2025 Projections – City of Riverside Buildout* and DEIR Section 3.3, *Cumulative Buildout Assumptions*.

A. Air Quality

The Project would result in a significant and unavoidable cumulative impact to air quality. As concluded in DEIR Section 4.1, future development would result in short-term construction emissions that would exceed the SCAQMD's ROG thresholds, and long-term operational emissions that would exceed the SCAQMD's thresholds for the following criteria pollutants: ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$. Additionally, localized operational pollutant concentrations that would exceed SCAQMD's LSTs for PM10 and $PM_{2.5}$. Despite compliance with proposed Mitigation Measures AQ-1 through AQ-6, GP 2025 Air Quality Element policies, and applicable SCAQMD rules and regulations, short-term construction, long-term operational, and localized pollutant concentration emissions would remain significant and unavoidable due to the Project's scope, scale, and overall buildout projections. As discussed above, the GP FPEIR concluded that GP 2025 buildout would result in significant and unavoidable impacts concerning air quality plan consistency, long-term air emissions, and pollutant concentrations at sensitive receptors despite implementation of recommended mitigation. As the Project would similarly result in significant and unavoidable impacts for air quality plan consistency, long-term air emissions, and pollutant concentrations, the Project would have a cumulatively considerable impact concerning air quality. A significant and unavoidable impact would occur despite implementation of proposed mitigation and a Statement of Overriding Considerations would be required should the City choose to approve the Project. (DEIR pages 4.1-31 to 4.1-34)

B. Biological Resources

The Project would result in a less than significant cumulative impact to biological resources. As described in DEIR Section 4.2, Project implementation would facilitate future development proposals and consequently increase urbanization in the City. Increased development could result in potential impacts to biological resources. However, the Project's potentially significant impacts would be mitigated to a level considered less than significant with adherence to existing federal, State, and local laws, ordinances, and regulations, as well as through compliance with existing GP FPEIR MM BIO-1 and proposed Mitigation Measures BIO-1 through BIO-3. It is noted that a significant component of the WRC MSHCP is its recommendation of advanced planning to cover potential cumulative impacts to sensitive habitats and covered species. Compliance with the WRC MSHCP (i.e., Sections 6.1.2, 6.1.3, 6.3.2, 6.1.4 of the MSHCP), as well as GP FPEIR Mitigation Measure BIO-1 and proposed Mitigation Measures BIO-1 through BIO-3, would ensure the Project's cumulative impacts to biological resources are less than significant. (DEIR pages 4.2-43 to 4.2-45)

C. Cultural and Tribal Cultural Resources

The Project would result in a significant and unavoidable cumulative impact to cultural and tribal cultural resources. As concluded in DEIR Section 4.3, future development could result in a significant impact to cultural and tribal cultural resources. However, as noted previously, approximately 67 percent of the candidate sites are developed to varying degrees and thus have low potential to reveal cultural or tribal cultural resources. As described in DEIR Table 4.3-1 through Table 4.3-11, several historical and archaeological resources have previously been recorded within or adjacent to the boundaries of several candidate sites; refer to DEIR Impacts 4.3-1 and 4.3-2. Despite compliance with proposed Mitigation Measures CUL-1 through CUL-4 and GP FPEIR Mitigation Measure Cultural 5, as well as RMC Title 20 and the specified GP 2025 policies, future development would cause a substantial adverse change in the significance of one City-designated Structure/Resource of Merit and three City-designated Historic Landmarks. A significant and unavoidable cumulative impact to historic resources would occur in this regard.

Potentially significant impacts to previously undiscovered archaeological resources would be reduced to less than significant levels following compliance with RMC Title 20, GP 2025 policies, and GP FPEIR Mitigation Measures Cultural 1 through 6. Compliance with proposed Mitigation Measure CUL-5, as well

as GP 2025 Policies HP-1.3 and HP-1.4, would reduce potentially significant impacts related to paleontological resources and unique geologic features to less than significant. Potentially significant impacts to human remains would be reduced to a less than significant level following compliance with GP FPEIR Mitigation Measures Cultural 1 through 6, and relevant GP 2025 policies. Project implementation would not cause a change in the significance of tribal cultural resources following compliance with GP FPEIR Mitigation Measures Cultural 1 through 6 and specified GP 2025 policies. Compliance with RMC Title 20, existing GP 2025 Policies, as well as GP FPEIR Mitigation Measures Cultural 1 through Cultural 6 and proposed Mitigation Measures CUL-1 through CUL-5, would ensure the Project's cumulative impacts to cultural and tribal cultural resources are less than significant.

Cumulative development in the City of Riverside creates the potential for additional impacts to archaeological, paleontological resources, human remains, and tribal cultural resources. Cumulative development in the City would undergo environmental and design review on a project-by-project basis pursuant to CEQA to evaluate potential impacts to cultural and tribal cultural resources. Cumulative impacts to cultural resources would be mitigated on a project-by-project basis through compliance with GP 2025 policies, GP FPEIR Mitigation Measures, and site-specific mitigation measures, and in accordance with the established regulatory framework concerning the protection of historical, archaeological, and paleontological resources. Thus, the combined cumulative impacts to cultural resources associated with the Project's incremental effects and those of cumulative projects would be less than significant with mitigation incorporated. (DEIR pages 4.3-48 to 4.3-49)

D. Greenhouse Gas Emissions

The Project would result in a significant and unavoidable cumulative impact concerning greenhouse gas emissions. As concluded in DEIR Section 4.4, future development would result in GHG emissions that would exceed SCAQMD thresholds. Despite implementation of proposed Mitigation Measure GHG-1 and compliance with applicable GP 2025 and CAP policies, the Project's GHG emissions would remain significant and unavoidable due to the Project's scope, scale, and overall buildout projections. As also concluded above, the Project would result in a significant and unavoidable impact concerning compliance with the City's CAP. As discussed above, the GP FPEIR concluded that GP 2025 buildout would result in significant and unavoidable impacts concerning GHG emissions. As the Project would similarly result in significant and unavoidable impacts concerning GHG emissions and compliance with the City's CAP, the Project would have a cumulatively considerable impact concerning GHG emissions. A significant and unavoidable impact would occur in this regard, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. (DEIR pages 4.4-20 to 4.4-21)

E. Hazards and Hazardous Materials

The Project would result in a less than significant cumulative impact concerning hazards and hazardous materials. Future development, in combination with other projects proposed in the vicinity, would result in an increase in risk of exposure to hazardous materials, including through excavation, spills, or releases. As described in DEIR Impact 4.5-2, conformance with Mitigation Measures HAZ-1 through HAZ-4, as well as the applicable regulatory framework, would reduce Project-related impacts to a less than significant level. Further, the land uses proposed under the Project are not anticipated to require the future routine use, transport, storage, or disposal of substantial quantities of hazardous materials. Hazardous materials would be typical of residential and mixed-uses and would not occur in reportable quantities, as they would for medium to heavy industrial-related use. All future development activities requiring the routing use, storage, transport, or disposal of hazardous materials would be subject to all applicable local, State, and federal regulatory requirements in place for hazardous materials. Project implementation would not cause an airport safety hazard following compliance with Mitigation Measure HAZ-5, and specified GP 2025 policies. Thus, the Project's contribution toward cumulative impacts is not otherwise considered to be cumulatively considerable.

Cumulative development would include a variety of land uses, including commercial and industrial, which could require the routine use, storage, transport, and disposal of hazardous materials. As with the proposed Project, all future development with the potential to involve hazards and hazardous materials would be

required to demonstrate compliance with applicable local, State, and federal regulatory requirements, including GP 2025 goals and policies intended to reduce and/or avoid potential adverse environmental effects and RFD (CUPA) requirements. For these reasons, cumulative impacts concerning hazards and hazardous materials would be mitigated on a project-by-project level, and in accordance with the established regulatory framework. (DEIR pages 4.5-35 to 4.5-37)

F. Land Use and Planning

The Project would result in a less than significant cumulative impact concerning land use and planning. As discussed in DEIR Section 4.6, the Project's impacts are reduced to less than significant following compliance with existing GP policies and other relevant laws, ordinances, regulations, and standards. As a Charter city, Riverside is not required to maintain consistency between the General Plan and Zoning Code. This has resulted in approximately 11,000 parcels citywide with inconsistent General Plan designations and zoning. Approximately 1,512 parcels citywide totaling approximately 1,096 acres involve inconsistencies within the VHDR, HDR, MU-U, and MU-V GP 2025 land use designations. Project implementation would facilitate quality planning and deliberate policies, and create consistency for selected candidate sites that are vacant or underutilized, and thus considered viable for development/redevelopment. The Project would assist the City in meeting its State-required Regional Housing Needs Allocation obligations and would update the existing Housing Element so that it is fully compliant with current State housing law. For these reasons, the Project would represent a beneficial impact to land use and planning, and the Project's contribution to cumulative impacts would not otherwise be cumulatively considerable.

Cumulative development would be evaluated at the project-level, when individual projects are implemented. Cumulative development (excluding the Project's proposed MFR "by right" uses) would undergo a plan review process for consistency with adopted land use plans and policies, in accordance with the requirements of CEQA, California Zoning and Planning Law, and the California Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. Each cumulative project would be analyzed independently and within the context of their respective land use and regulatory settings. It is assumed that cumulative development would be processed in accordance with the GP 2025 and RMC. The proposed Rezoning Program identifies candidate sites, which would permit MFR uses by right pursuant to CGC Section 65583.2(h) (e.g., without a Conditional Use Permit, Planned Unit Development Permit, or other discretionary action). Therefore, cumulative land use and planning impacts resulting from future development would not be "cumulatively considerable." A less than significant would occur in this regard. (DEIR pages 4.6-37 to 4.6-39)

G. Noise

The Project would not result in a significant cumulative impact to noise.

Cumulative Traffic Noise Sources. The cumulative traffic noise analysis is conducted in a two-step process. First, the combined effects from both the proposed Project and other projects are compared. Second, for combined effects that are determined to be cumulatively significant, the proposed Project's incremental effects are then analyzed. A project's contribution to a cumulative traffic noise increase would be considered significant when the combined effect exceeds perception level (i.e., auditory level increase) threshold. The combined effect compares the "cumulative plus project" condition to "existing" conditions. This comparison accounts for the traffic noise increase generated by the proposed Project combined with the traffic noise increase generated by the cumulative projects. The following criteria have been utilized to evaluate the combined effect of the cumulative noise increase.

- Combined Effects: The cumulative with Project noise level ("2040 With Project") would cause a significant cumulative impact if a 3 dBA increase over existing conditions occurs and the resulting noise level exceeds the applicable exterior standard at a sensitive use.

Although there may be a significant noise increase due to the proposed Project in combination with identified cumulative projects (combined effects), it must also be demonstrated that the Project has an incremental effect. In other words, a significant portion of the noise increase must be due to the proposed

project. The following criteria have been utilized to evaluate the incremental effect of the cumulative noise increase.

- Incremental Effects: The "2040 With Project" causes a 1 dBA increase in noise over the "2040 Without Project" noise level.

A significant impact would result only if both the combined and incremental effects criteria have been met, and the noise level exceeds standards. Noise is a localized phenomenon, and drastically reduces as distance from the source increases. Consequently, only the cumulative development in the candidate sites' general vicinity would contribute to cumulative noise impacts. DEIR Table 5.7-10, *Cumulative Traffic Noise Scenario*, lists the traffic noise effects along roadway segments in the Project vicinity for "Existing," "2040 Without Project," and "2040 With Project," including incremental and net cumulative impacts.

First, it must be determined whether the cumulative plus project increase above existing conditions (Combined Effects) is exceeded. As concluded in DEIR Table 4.7-10, this criterion is not exceeded along any of the segments. Next, under the Incremental Effects criteria, cumulative noise impacts are defined by determining if the ambient (2040 Without Project) noise level is increased by 1 dB or more. Based on the results shown in DEIR Table 4.7-10, two of the segments exceed the Combined Effects criteria. However, no segments would exceed both the Combined Effects and the Incremental Effects criteria. Therefore, the proposed Project, in combination with cumulative background traffic noise levels, would not result in a significant cumulative traffic noise impact.

CUMULATIVE STATIONARY NOISE SOURCES

Although related cumulative projects have been identified within the Project vicinity (refer to DEIR Table 4-1), the noise generated by stationary equipment onsite cannot be quantified given the conceptual nature of each future development. However, each cumulative Project would require separate discretionary approval and CEQA assessment, which would address potential noise impacts and identify necessary attenuation measures, where appropriate. Future development would be required to adhere to Riverside GP 2025 Policies N-1.4 and N-1.8, which requires that noise considerations be incorporated into site plans and evaluations, particularly concerning parking and loading areas, ingress/egress points and refuse collection areas. Refer to DEIR Appendix E for the full text of these measures. In addition, future development within the project area would be required to comply with City, State and Federal guidelines regarding noise abatement and insulation standards. Future multifamily residential developments that meet the significance criteria would be required to conduct a project-level assessment of noise impacts (see proposed Mitigation Measure NOI-4). Future developments would be required to mitigate noise impacts for compliance with RMC Title 7 noise standards. Future mixed-use developments (not proposed multifamily residential by right uses) would be evaluated at the project-level, when individual projects are implemented. Future mixed-use developments would be subject to review under CEQA. This would ensure that noise levels in the Project area and surrounding areas are maintained within acceptable standards that prevent excessive disturbance, annoyance, or disruption. Additionally, as noise dissipates as it travels away from its source, noise impacts from stationary sources would be limited to each of the respective development sites and their vicinities. Therefore, cumulative noise impacts from stationary noise sources would be considered less than significant. (DEIR pages 4.7-29 to 4.7-34)

H. Public Services and Recreation

The Project would not result in a significant cumulative impact to public services and recreation. Potential impacts associated with public services, and parks and recreation resulting from Project implementation are evaluated in the impact thresholds above. As concluded in DEIR Section 4.8, impacts to public services (fire and police protection, schools, and libraries) and parks and recreational facilities would be less than significant following compliance with the applicable regulations, RMC requirements, GP 2025 polices, and proposed mitigation measures. GP FPEIR Mitigation Measure REC-1 requires future development to provide developed parks or development fees prior to demolition, grading, or building permit approval. GP FPEIR Mitigation Measure REC-2 requires the City to re-evaluate Park Development Impact Fees annually,

to ensure that the fees collected from new development appropriately pay for the development of required park acreage. The Project's incremental effects are not considered cumulatively considerable in this regard.

As discussed in DEIR Section 4.8, the City collects development impact fees to finance public services and parks and recreational facilities attributable to each new development. Payment of these fees would minimize, to the greatest extent practicable, impacts from cumulative development. Therefore, cumulative impacts on public services and parks and recreation would be less than significant following compliance with regulatory requirements and GP FPEIR mitigation. (DEIR pages 4.8-25 to 4.8-27)

I. Transportation and Traffic

Cumulative/Future (2040) Plus Project Roadway Conditions: As concluded in DEIR Section 4.9, under Cumulative/Future (2040) Plus Project Conditions, impacts to the following roadway segment would be reduced to less than significant (operations would improve to LOS C or better), with mitigation incorporated (e.g., proposed Mitigation Measures TRA-1 and TRA-2):

- #28 - Van Buren Boulevard (South of Cleveland Avenue).

Under Cumulative/Future (2040) Plus Project Conditions, the significance thresholds would not be exceeded with mitigation incorporated; therefore, the Project would not result in a cumulatively significant effect concerning Roadway #28.

Given the recommended improvements would be infeasible or the roadway is already fully improved according to its GP 2025 designation, impacts to the following roadway segments would be considered significant and unavoidable, under Cumulative/Future (2040) Plus Project Conditions:

- #1 Alessandro Boulevard (East of Mission Grove Parkway);
- #2 - Alessandro Boulevard (North of Via Vista Drive);
- #3 - Alessandro Boulevard (West of Sycamore Canyon Boulevard);
- #8 - Indiana Avenue (East of Harrison Street);
- #9 - Jackson Street (North of Indiana Avenue);
- #31 - Van Buren Boulevard (North of Arlington Avenue); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Under Cumulative/Future (2040) Plus Project Conditions, the significance thresholds would be exceeded given there would be no feasible mitigation for Roadways #1, #2, #3, #8, #9, #31, and #33; therefore, the Project would result in a cumulatively significant effect concerning Roadways #1, #2, #3, #8, #9, #31, and #33. A significant and unavoidable impact would occur in this regard and a Statement of Overriding Considerations would be required should the City choose to approve the Project.

Cumulative/Future (2040) Plus Project CMP Roadway Conditions: As concluded above, under Cumulative/Future (2040) Plus Project Conditions, impacts to the following CMP roadway would be reduced to less than significant (operations would improve to LOS C or better), with mitigation incorporated (e.g., proposed Mitigation Measures TRA-1 through TRA-3):

- #28 - Van Buren Boulevard (South of Cleveland Avenue).

Given the recommended improvement would be infeasible, impacts to the following CMP roadway segment would be considered significant and unavoidable, under Cumulative/Future (2040) Plus Project Conditions:

- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Under Cumulative/Future (2040) Plus Project Conditions, the significance thresholds would be exceeded given there would be no feasible mitigation for CMP Roadway #33; therefore, the Project would result in

a cumulatively significant effect concerning CMP Roadway #33. A significant and unavoidable impact would occur in this regard and a Statement of Overriding Considerations would be required should the City choose to approve the Project.

Other Thresholds: Concerning hazards due to a design feature, emergency access, and policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, as concluded above, Project implementation would result in less than significant impacts following compliance with the specified GP 2025 policies. All future developments' consistency with applicable federal and State regulatory requirements, including GP 2025 policies, intended to reduce and/or avoid potential impacts involving transportation and traffic, would be verified. Cumulative impacts to transportation and traffic would be mitigated on a project-by-project level, and in accordance with the established regulatory framework, through the established regulatory review process. (DEIR pages 4.9-49 to 4.9-52)

J. Utilities and Service Systems

The Project would not result in a significant cumulative impact to utilities and service systems. As described in DEIR Section 4.10, future development would result in a net increase of 11,649 DU and as much as 5.9 million SF of non-residential uses over existing conditions. Thus, future development has the potential to increase the City's demands for stormwater drainage, water and wastewater facilities, and solid waste disposal over existing conditions. As discussed in DEIR Section 4.10, the Project's impacts are reduced to less than significant following compliance with existing GP 2025 policies, GP FPEIR Mitigation Measures UTL-1, UTL-2, and UTL-4, and other relevant laws, ordinances, regulations, and standards.

Cumulative development within the City would be evaluated at the project-level, as they are implemented. Cumulative development would undergo a plan review process for potential to impact existing utilities and service systems and require additional utilities and service systems. All future development would be required to demonstrate compliance with all applicable federal, State, and local regulations concerning utilities. Further, all future development would be subject to all applicable connection fees and ongoing user fees related to the provision of wastewater treatment, sewer, and water services. Connection fees are used in part to defray the cost of any necessary facility upgrades, as determined by RPU and Western. Payment of required connection fees and ongoing user fees, as well as adherence to existing federal, State, and local laws, ordinances, and regulations, and any project-specific conditions of approval dictated by RPU or Western, would ensure that adequate wastewater, sewer, and water services are available to serve the project. As with the Project, cumulative development would be required to demonstrate compliance with the 2016 (or most recent) Green Building Code, AB 939, and the SRRE requirements to reduce impacts to solid waste. Particularly, the City and its surrounding jurisdiction's SRRE requirements would aid in diverting solid waste to reduce cumulative impacts to less than significant. Therefore, cumulative utilities and service systems impacts resulting from future development would not be cumulatively considerable. A less than significant would occur in this regard. (DEIR pages 4.10-26 to 4.10-29)

4.5 Findings Regarding Significant Irreversible Environmental Changes

According to CEQA Guidelines Sections 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project were implemented. As stated in CEQA Guidelines Section 15126.2(c):

> *"…..uses of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely, Primary impacts and, particularly, secondary impacts [such as highway improvement which provides access to a previously inaccessible area] generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*

As discussed in DEIR Section 5.2, *Significant Irreversible Environmental Changes that would be Involved in the Proposed Project Should it be Implemented*, future development would consume limited, slowly renewable and non-renewable resources. This consumption would occur during each individual project's construction phase and would continue throughout its operational lifetime. Future development would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and persons to and from individual development sites. Construction would require the consumption of resources that are not renewable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products; aggregate materials used in concrete and asphalt; metals; and water. Fossil fuels such as gasoline and oil would also be consumed to power construction vehicles and equipment.

The resources that would be committed during future development operations would be similar to those currently consumed within the City. These would include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation, and the existing, finite supplies of these natural resources would be incrementally reduced. Future development operations would occur in accordance with California Code of Regulations (CCR) Title 24, Part 6, which sets forth conservation practices that would limit energy consumption. However, energy requirements would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

The potential exists that individual future developments would use and store limited amounts of potentially hazardous materials typical of residential and commercial uses. However, these materials would be used in small quantities and would be used, handled, stored, and disposed of in accordance with the manufacturer's instructions and the established regulatory framework. Compliance with these regulations and standards would protect against significant and irreversible environmental changes resulting from the accidental release of hazardous materials.

Approximately 265 acres (67 percent) of the identified candidate sites are developed to varying degrees, and thus would require demolition activities to accommodate future development. All potential future demolition activities must comply with the established regulatory requirements to ensure that asbestos and lead-based paints are not released into the environment, as well as proposed Mitigation Measures HAZ-1 through HAZ-4; refer to DEIR Section 4.5. Compliance with the established regulatory framework, GP 2025 policies, and recommended mitigation would protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials.

In summary, future development construction and operations would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these resource quantities for future generations or for other uses during the life of the individual developments. However, continued use of such resources would be on a relatively small scale in a regional context. Although irreversible environmental changes would result from Project implementation, such changes would not be considered significant. (DEIR pages 5-1 to 5-2)

4.6 Findings Regarding Growth Inducing Impacts

In compliance with CEQA Guidelines Section 15126(d), DEIR Section 5.3, *Growth-Inducing Impacts*, discusses the ways in which the Project could foster economic or population growth, or the construction on additional housing, either directly or indirectly, in the surrounding environment. In summary, Project implementation would not be growth-inducing with respect to removing an impediment to growth (i.e., establishing an essential public service or through providing new access to the area) or through encroaching on an isolated area of open space. However, the Project is considered growth-inducing with respect to fostering economic and population growth, and establishing a precedent-setting action. Refer to DEIR pages 5-2 through 5-9 for an expanded discussion.

SCAG is responsible for developing and adopting growth forecasts for Riverside County (County), among others. As discussed previously, Project implementation would exceed SCAG's adopted growth forecasts. At the regional level, the emphasis regarding growth has been placed primarily on achieving a balance of employment and housing opportunities within the subregions. This regional concept, referred to as jobs/housing balance, encourages the designation and zoning of sufficient vacant land for residential uses with appropriate standards to ensure adequate housing is available to serve the needs derived from the local employment base. The jobs/housing ratio can be used as the general measure of balance between a community's employment opportunities and the housing needs of its residents. A ratio of 1.0 or greater generally indicates that a City provides adequate employment opportunities, potentially allowing its residents to work within the City. A desirable jobs/housing balance improves regional mobility (traffic), reduces vehicle miles traveled, and improves air quality. Conversely, imbalance between a City's jobs and housing increases commutes, with resultant increases in traffic volumes and air emissions, and overall reduces the quality of life.

The City's current jobs/housing ratio is approximately 1.19, indicating the City is currently job rich with sufficient employment opportunities for its residents to potentially work within the City. The Project is anticipated to increase the Planning Area's housing stock by approximately 12 percent (11,649 DU) and employment by 14 percent (13,581 jobs) over existing conditions, resulting in a forecast jobs/housing ratio of approximately 1.19. The Project would not change the City's jobs/housing balance. City residents who currently commute to work in Riverside, Los Angeles, or San Bernardino Counties could potentially seek work in the City due to the availability of approximately 13,581 new jobs. Therefore, the Project would not impact the City's jobs/housing balance, since the jobs/housing ratio would remain the same, when compared to existing conditions.

Additionally, the GP 2025 accounts for increased growth and establishes policies to reduce its potential growth-related impacts. All future development with growth-inducing potential would be subject to compliance with GP 2025 policies outlined in DEIR Section 4.7, *Land Use and Planning*. It is also noted that the forecast household and population growth would occur incrementally through 2025, allowing for development of necessary services and infrastructure commensurate with the proposed growth. (DEIR pages 5-2 through 5-9)

5.0 ALTERNATIVES TO THE PROJECT

5.1 Summary of Project Alternatives and Objectives

CEQA Guidelines Sections 15126.6 *et. seq*. requires that a reasonable range of alternatives to the Project be evaluated, provided they would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines further require the analysis of the "No Project" Alternative, wherein the Project would not be approved and implemented. Several project alternatives were considered but ultimately rejected for infeasibility or failure to lessen environmental effects.

The following alternatives to the Project were analyzed in the DEIR:

Alternative 1: "No Project" Alternative

Alternative 2: "Vacant Sites Only" Alternative

Alternative 3: "Impacted Sites Excluded" Alternative

CEQA Guidelines Section 15124(b) requires that a project description contain a statement of objectives including a project's underlying purpose. The Project objectives are:

STATEWIDE GOALS

The City supports and endorses the statewide housing goal "…of a decent home and a satisfying environment for every Californian...." The City supports and endorses the goals incorporated in present State Law pertaining to the manner in which the City's actions must be directed so that there is adequate provision for the housing needs of all economic segments. These statewide goals, which are reflected in GP 2025, are summarized below:

- Goal 1: Identify adequate sites to facilitate and encourage housing for households of all economic levels, including persons with disabilities.

- Goal 2: Remove, as legally feasible and appropriate, governmental constraints to housing production, maintenance, and improvement.

- Goal 3: Assist in the development of adequate housing for low and moderate income households.

- Goal 4: Preserve for lower income households the publicly assisted multiple-family housing developments in each community.

- Goal 5: Conserve and improve the condition of housing, including existing affordable housing.

- Goal 6: Promote a range of housing opportunities for all individuals and households in Riverside regardless of status.

HOUSING ELEMENT PROGRAMS AND OBJECTIVES

Pursuant to California Government Code Section 65583, the Housing Element incorporates objectives, policies, and programs to facilitate the development, improvement, and preservation of housing. The Housing Implementation Plan, describe the specific actions to implement the City's housing programs. The Housing Element Housing Plan section describes the City's overall approach in achieving its long-term housing objectives through the pursuit of the following four objectives:

- Objective 1: Create neighborhoods that offer distinctive, special places to live that are safe and well served by community amenities, and encourage community involvement in local decision making.

- Objective 2: Facilitate the development of a diversity of housing types and prices that are high quality, built in a sustainable manner, and meet the varied housing needs of residents.

- Objective 3: Increase the opportunities for low and moderate income residents and workforce to find suitable ownership and rental housing in the community.

- Objective 4: Provide adequate housing and supportive services that assist in meeting the varied needs of residents with special housing needs.

The Project's objective is to accommodate the City's remaining RHNA allocation of 4,767 DU.

5.2 Alternatives Considered but Rejected

In accordance with CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet the most basic project objectives, the alternative infeasibility, or the alternative's inability to avoid significant environmental impacts. Two alternatives were considered but rejected, as discussed below and in DEIR Section 6.5, *Alternatives Considered But Rejected*.

1. "Alternative Sites" Alternative

The "Alternative Sites" Alternative proposes that the Project involve alternative candidate sites within the City other than those identified throughout this EIR. In compliance with State law, the EIR considers 69 candidate sites for rezoning within the City's boundaries. The candidate sites are comprised of 303 parcels and total approximately 395 acres; see DEIR Appendix D for a list of the parcels which make up the candidate sites. Among other factors, the candidate sites identified in DEIR Appendix D were selected based on their ability to support future development, particularly regarding possessing a minimum lot size for multi-family residential development. Sites already possessing infrastructure and utility connection points, or located near existing infrastructure and utility connection points, were favored over those that did not. In addition, the City's site selection process attempted to avoid the following constraints to development: RMC-designated arroyo areas; multiple Airport Land Use Compatibility Zones, including those associated with the MARB/IPA, Riverside Municipal Airport, and Flabob Airport; several RMC-protected historic districts; local voter-approved agricultural areas; open space areas; current long-range planning efforts (i.e., Northside Specific Plan and Hunter Business Park Specific Plan); and industrial uses. Based on the above constraints to development, the "Alternative Sites" Alternative was rejected from further consideration. (DEIR page 6-15)

2. "Only 4,767 Remaining RHNA" Alternative

The "Only 4,767 Remaining RHNA" Alternative would reduce the proposed Project's buildout from a net increase of as many as 11,649 DU over existing conditions to 4,767 DU. As described previously, the City has a remaining RHNA of 4,767 DU to address local and regional housing needs. Although the "Only 4,767 Remaining RHNA" Alternative would meet the State requirements and Project objectives, this alternative was ultimately rejected due to statutory and site-specific limitations, which could hinder the City's ability to satisfy RHNA goals.

State law requires that jurisdictions evaluate housing elements every eight years to determine effectiveness in achieving State and regional housing goals and objectives, and adopt an updated Housing Element reflecting the results of this evaluation. California specifically mandates that 50 percent of the City's remaining dwelling units are accommodated on sites exclusively zoned for residential uses. Finally, each site must be large enough to accommodate a minimum of 16 units pursuant to State requirements.

The proposed Housing Element update involves rezoning and General Plan amendments to as many as 395 acres (303 parcels). This exceeds the minimum 191 acres required to be rezoned to meet the RHNA requirements. However, this "buffer" is necessary to accommodate the potential elimination of sites that may be unsuitable to meet the RHNA as a result of various circumstances, including: sites that change status because of pending or forthcoming development entitlements (if entitled, some candidate sites will no longer be viable vacant and underutilized opportunity sites); sites with development or compatibility constraints such as those affected by an airport land use compatibility plan; sites that may not be considered acceptable to the State Housing & Community Development Department; and the public hearing process. Any excess rezoned property beyond the current RHNA need could count toward required zoning to meet RHNA requirements of future Housing Element updates, therefore, any rezoning of sites above and beyond could benefit the City in the future. (DEIR page 6-16)

5.3 Alternatives Carried Forward for Further Analysis

A. "No Project" Alternative

Description

According to CEQA Guidelines Section 15126.6(e), the specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed Project with impacts of not approving the proposed Project. The no project analysis is required to discuss the existing conditions (at

the time the Notice of Preparation is published (April 12, 2017)), as well as what would be reasonably expected to occur in the foreseeable future, if the Project were not approved, based on current plans and consistent with available infrastructure and community services (DEIR pages 6-5 to 6-8). This alternative assumes the land use, population, and employment growth projections for the City and its sphere of influence (SOI) area at buildout in 2025, consistent with the existing GP 2025. DEIR Section 3.2, *General Plan 2025 Projections – City of Riverside Buildout*, discusses in detail the GP 2025 buildout capacities, inclusive of the post GP-adoption General Plan Amendments (GPA). DEIR Table 3-2, General Plan 2025 Buildout Land Use, Population, and Employment Projections (Typical Development), presents the projected maximum land uses, population, and employment at City buildout in 2025; refer also to DEIR Exhibit 4.6-1, *Candidate Sites Existing GP 2025 Land Use Designations*. Under the typical development scenario and inclusive of the post General Plan-adoption GPAs, the Planning Area's maximum residential and non-residential land uses at buildout in 2025 are approximately 128,170 DU and 339 million SF of non-residential land uses, and maximum population and employment at buildout are 384,510 persons and 152,865 jobs, respectively; refer to DEIR Table 3-2.

This alternative would result in 8,243 fewer DU and 1.3 million SF less non-residential use floor area, as compared to the proposed Project; see also DEIR Tables 4.6-3 and 4.6-7, and Section 5.3, *Growth-Inducing Impacts*. When compared to the proposed Project, this alternative would result in the following:

- Housing: Approximately nine (9) percent less housing;
- Population: Approximately ten (10) percent less population;
- Non-Residential (Employment-Generating Land Uses): Approximately two percent less non-residential floor area; and
- Employment: Approximately nine (9) percent fewer jobs.

Summary of Impacts

The following table presents a summary of the impacts associated with the "No Project" Alternative.[10]

Environmental Issue Area	Impacts
Air Quality	Since this alternative would involve less development, the "No Project" Alternative would generate less pollutant emission than the proposed Project. Thus, air quality impacts associated with this alternative would be less than that of the proposed Project. (DEIR page 6-6)
Biological Resources	Because the "No Project" Alternative would assume buildout consistent with the existing GP 2025, this alternative involve comparable impacts to biological resources, including special status plant and wildlife species, riparian habitat, and other sensitive natural communities. Thus, this alternative would be considered neither environmentally superior nor inferior to the proposed Project. (DEIR page 6-6)
Cultural and Tribal Cultural Resources	Although this alternative could avoid the Project's significant and unavoidable impact to historic resources (i.e., City of Riverside-designated Historic Landmarks and Structures/Resources of Merit), the "No Project" Alternative could result in similar impacts to City of Riverside-designated Historic Landmarks and Structures/Resources of Merit elsewhere in the City given the anticipated development. Thus, the "No Project" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning cultural and tribal cultural resources. (DEIR page 6-6)
Greenhouse Gas Emissions	Due to reduced development, the "No Project" Alternative's impacts concerning GHG emissions would be less than that of the proposed Project. Thus, the "No Project" Alternative

[10] Refer to DEIR pages 6-6 to 6-8.

Environmental Issue Area	Impacts
	would be considered environmentally superior to the proposed Project concerning GHG emissions. (DEIR page 6-6)
Hazards and Hazardous Materials	The "No Project" Alternative would involve less, although comparable, impacts involving hazards and hazardous materials, particularly during operations. However, this alternative would involve fewer potentially significant impacts concerning demolition, as it can be assumed that future development under this alternative would occur on vacant land. As described in DEIR Section 4.5, the Project's potentially significant impacts concerning demolition are reduced to less than significant through conformance with proposed Mitigation Measures HAZ-1 through HAZ-6. Thus, the "No Project" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning hazards and hazardous materials. (DEIR pages 6-6 to 6-7)
Land Use and Planning	Although this alternative would avoid the Project's significant and unavoidable impacts concerning SCAG adopted growth forecasts, the "No Project" Alternative would involve a significant and unavoidable land use impact, as it would not accomplish the City's RHNA of 4,767 DU for the 5th Cycle 2014-2021 Housing Element. Thus, the "No Project" Alternative would be considered neither environmentally superior nor inferior to the proposed Project. (DEIR page 6-7)
Noise	Although this alternative could avoid the Project's significant and unavoidable traffic noise impacts, it could result in similar impacts elsewhere in the City given the anticipated development. Thus, the "No Project" Alternative would be considered neither environmentally superior nor inferior to the proposed Project. (DEIR page 6-7)
Public Services and Recreation	Site-specific development accommodated under the "No Project" Alternative would involve less, although comparable, impacts to public services and recreation as the proposed Project, following compliance with the established regulatory framework and GP FPEIR Mitigation Measures PS-1, REC-1, and REC-2. Thus, the "No Project" Alternative would be considered neither environmentally superior nor inferior to the proposed Project. (DEIR page 6-7)
Transportation and Traffic	Although this alternative could avoid the Project's significant and unavoidable transportation and traffic impacts, it could result in similar impacts elsewhere in the City, given the anticipated development. Thus, the "No Project" Alternative would be considered neither environmentally superior nor inferior to the proposed Project. (DEIR page 6-7)
Utilities and Service Systems	Site-specific development accommodated under the "No Project" Alternative would involve less, although comparable, impacts to utilities and service systems as the proposed Project, following compliance with the established regulatory framework and GP FPEIR Mitigation Measures UTL-1, UTL-2, and UTL-4. Thus, the "No Project" Alternative would be considered neither environmentally superior nor inferior to the proposed Project. (DEIR page 6-7)

Relationship to Project Objectives

The "No Project" Alternative would not achieve any of the statewide goals which are reflected in GP 2025. Similarly, this alternative would not achieve the Housing Plan's long-term housing objectives. This alternative would not achieve the Project's objective is to accommodate the City's remaining RHNA allocation of 4,767 DU. Refer to DEIR Section 6.2, *Project Objectives and Goals*.

Finding: The City Council rejects Alternative 1 (No Project, No Build Alternative) as a project alternative on the following factors, each of which individually provides sufficient justification for rejection of this alternative: 1) although this alternative could avoid the Project's significant and unavoidable impacts, these could occur elsewhere in the City; 2) this alternative would not satisfy any of the Project Objectives and Goals specified in DEIR Section 6.2; and, 3) this alternative would directly conflict with California Government Code Section 65583, which stipulates that a jurisdiction must assess its housing element every

eight years and identify adequate sites for housing and provide for the existing and projected needs of all economic segments of the community.

Facts and Supporting Information

Although this alternative would reduce most of the Project's significant impacts, the "No Project" Alternative would fail to accomplish any of the statewide goals which are reflected in GP 2025 and would not achieve the Housing Plan's long-term housing objectives. In addition, this alternative would not accommodate the City's remaining RHNA allocation of 4,767 DU and thus would directly conflict with California Government Code Section 65583, described above. Therefore, the "No Project" Alternative is rejected as infeasible.

B. "Vacant Sites Only" Alternative

Description

As discussed in detail in DEIR Section 2.5, *Project Characteristics*, the proposed Project involves General Plan Amendments, Zone Changes, and Specific Plan Amendments to as many as 69 candidate sites and as many as 303 parcels totaling approximately 395 acres; see also DEIR Appendix D. Appendix D describes the candidate sites' existing onsite conditions and indicates that approximately 265 acres (approximately 67 percent) of the candidate sites are developed to varying degrees with residential and non-residential land uses, while the remaining approximately 130 acres are undeveloped. The "Vacant Sites Only" Alternative assumes that the 2014-2021 Housing Element Update Housing Implementation Plan and its associated re-designation and rezoning efforts would only involve vacant candidate sites. Under this alternative, the proposed zoning for these vacant candidate sites would be consistent with the Project's proposed zoning; see DEIR Appendix D. The maximum development capacity for these vacant candidate sites (based on zoning) is approximately 3,739 DU and approximately 1.4 million SF of non-residential land uses. This alternative would result in 7,976 fewer DU and 5.8 million SF less non-residential use floor area, as compared to the proposed Project. When compared to the proposed Project, this alternative would result in approximately 68% percent less housing and approximately 80 percent less non-residential floor area than the Project. The approximately 66 DU and approximately 1.33 million SF of non-residential land uses located on the candidate sites would not be removed under this alternative.

Summary of Impacts

The following table presents a summary of the impacts associated with the "Vacant Sites Only" Alternative.[11]

Threshold	Impacts
Air Quality	Although the "Vacant Sites Only" Alternative would not involve any demolition activities and significantly less development, the Project's significant and unavoidable short-term construction, long-term operational, and cumulative air quality impacts would likely not be avoided. Although Project impacts would not be avoided, the impacts under this alternative would be significantly less than the proposed Project; thus, the "Vacant Sites Only" Alternative would be considered environmentally superior to the proposed Project concerning air quality. (DEIR page 6-9)
Biological Resources	Future development accommodated under the "Vacant Sites Only" Alternative would involve the same vacant candidate sites as the proposed Project. For this reason, this alternative would involve similar impacts to special status plant and wildlife species, riparian habitat, and other sensitive natural communities as the proposed Project. Thus, the "Vacant Sites Only" Alternative would be considered neither environmentally inferior nor inferior to the proposed Project concerning biological resources. (DEIR page 6-9)

[11] Refer to DEIR pages 6-8 to 6-11.

Threshold	Impacts
Cultural and Tribal Cultural Resources	Future development accommodated under the "Vacant Sites Only" Alternative would involve similar potential impacts to archaeological and paleontological resources, human remains, and tribal cultural resources as the proposed Project. As the "Vacant Sites Only" Alternative would not involve demolition activities, this alternative would avoid the Project's direct impacts to City-designated historical resources. Thus, the "Vacant Sites Only" Alternative would be considered environmentally superior to the proposed Project concerning cultural and tribal cultural resources. (DEIR page 6-9)
Greenhouse Gas Emissions	Although Project impacts would not be avoided, the impacts under this alternative would be significantly less than the proposed Project as this alternative would not involve demolition activities and would involve significantly less development, therefore generating significantly less short-term construction GHG emissions. Thus, the "Vacant Sites Only" Alternative would be considered environmentally superior to the proposed Project concerning GHG emissions. (DEIR pages 6-9 to 6-10)
Hazards and Hazardous Materials	Although all Project-related impacts concerning hazards and hazardous materials would be reduced to less than significant following conformance with proposed Mitigation Measures HAZ-1 through HAZ-6, significantly less site disturbance and development would occur under the "Vacant Sites Only" Alternative; thus, this alternative would be considered environmentally superior to the proposed Project concerning hazards and hazardous materials. (DEIR page 6-10).
Land Use and Planning	The "Vacant Sites Only" Alternative would facilitate future growth; however, would not exceed SCAG adopted growth forecasts. Therefore, this alternative would avoid the Project's significant and unavoidable impacts concerning SCAG growth forecasts. Thus, the "Vacant Sites Only" Alternative would be considered environmentally superior to the proposed Project concerning land use and planning. (DEIR page 6-10)
Noise	Under this alternative, the Project's significant and unavoidable vehicle noise impacts would likely be avoided, and construction and operational noise impacts would be significantly less. Thus, the "Vacant Sites Only" Alternative would be considered environmentally superior to the proposed Project concerning noise. (DEIR page 6-10)
Public Services and Recreation	The "Vacant Sites Only" Alternative would involve significantly less demand for public services and recreational facilities as the proposed Project. Like the proposed Project, future development accommodated under this alternative would be subject to compliance with the established regulatory framework and GP 2025 FPEIR Mitigation Measures PS-1, REC-1, and REC-2. Thus, the "Vacant Sites Only" Alternative would be considered environmentally superior to the proposed Project concerning public services and recreation. (DEIR pages 6-10 to 6-11)
Transportation and Traffic	Under this alternative, the traffic volumes would be significantly less than the proposed Project. Thus, the "Vacant Sites Only" Alternative would be considered environmentally superior to the proposed Project concerning transportation and traffic. (DEIR page 6-11)
Utilities and Service Systems	Under this alternative, the demands for utilities and service systems would be significantly less than the proposed Project. However, the Project's utilities and service systems impacts are reduced to less than significant following conformance with the established regulatory framework and existing GP FPEIR mitigation measures. Thus, the "Vacant Sites Only" Alternative would be considered neither environmentally superior nor inferior to the proposed Project. (DEIR page 6-11)

Relationship to Project Objectives

The "Vacant Sites Only" Alternative would not achieve most of the statewide goals, which are reflected in GP 2025. Similarly, this alternative would not achieve most of the Housing Plan's long-term housing objectives. This alternative would not achieve the Project's objective to accommodate the City's remaining RHNA allocation of 4,767 DU.

Finding

The City Council rejects the "Vacant Sites Only" Alternative as a Project alternative on the following factors, each of which is individually provides sufficient justification for rejection of this alternative: (1) the "Vacant Sites Only" Alternative would not satisfy most of the Project Objectives and Goals specified in DEIR Section 6.2; and 2) this alternative would directly conflict with California Government Code Section 65583 since it would not accommodate the City's remaining RHNA allocation of 4,767 DU.

Facts and Supporting Information

Although this alternative would reduce the Project's significant and unavoidable impacts to City-designated historical resources and would reduce (but not avoid) the Project's air quality and GHG impacts, the "Vacant Sites Only" Alternative would not satisfy most of the Project Objectives and Goals and would directly conflict with California Government Code Section 65583, described above. Therefore, although this alternative would involve significantly less development than the proposed Project, and is considered environmentally superior to the proposed Project, this Alternative is rejected.

C. "Impacted Sites Excluded" Alternative

Description

As indicated in DEIR Section 4.3 and Section 4.5, future development accommodated through Project implementation would involve significant and unavoidable impacts related to cultural resources (specifically City-designated Historic Landmarks, Contributors to the Arlington Village Commercial Neighborhood Conservation Area, and Structures/Resources of Merit) and compliance with the March Air Reserve Base/Inland Port Airport (MARB/IPA) Airport Land Use Compatibility Plan (ALUCP). While most the proposed Project's potential impacts would be avoided through implementation of proposed Mitigation Measures CUL-2 and HAZ-5,[12] the "Impacted Sites Excluded" Alternative considers exclusion of the following candidate sites to altogether avoid all impacts to City-designated Historic Resources and incompatibility with the MARB/IPA Airport Land Use Compatibility Plan (ALUCP):

Cultural and Tribal Cultural Resources

- W5G1S16 (Three City of Riverside-designated Historic Landmarks);
- W5G1S19 (13 Contributors to the Arlington Village Commercial Neighborhood Conservation Area); and
- W5G3S12 (One City of Riverside-designated Structure/Resource of Merit).

Compliance with MARB/IPA ALUCP Zone C2, Flight Corridor Zone Requirements

- W4G3S13; and
- W4G4S36.

Exclusion of these sites would result in a maximum development capacity of 9,916 DU and 5.7 million SF of non-residential development over existing conditions. As a comparison, the proposed Project is

[12] Proposed Mitigation Measure CUL-2 requires that Candidate Site W5G1S19, which supports thirteen (13) Contributors to the Arlington Village Commercial Neighborhood Conservation Area, be excluded from the Project. Mitigation Measure HAZ-5 requires that Candidate Sites W4G3S13 and W4G4S36 be excluded from the Project.

anticipated to result in a net increase of as many as 11,649 DU and as much as 5.9 million SF of non-residential land uses over existing conditions. This alternative would result in 1,733 fewer DU and 0.2 million SF less non-residential use floor area, as compared to the proposed Project. When compared to the proposed Project, this alternative would result in approximately 15% percent less housing and approximately three percent less non-residential floor area than the Project. (DEIR page 6-12)

Summary of Impacts

The following table presents a summary of the impacts associated with the "Impacted Sites Excluded" Alternative.[13]

Threshold	Impacts
Air Quality	Based on the Project's scope, scale, and overall buildout projections, exclusion of the above-mentioned candidate sites would not avoid the Project's significant and unavoidable short-term construction, long-term operational, and cumulative impacts to air quality. Thus, the "Impacted Sites Excluded" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning air quality. (DEIR pages 6-12 to 6-13)
Biological Resources	Selection of the "Impacted Sites Excluded" Alternative would not reduce the Project's (mitigated) less than significant impacts to special status plant and wildlife species and riparian habitat and other sensitive natural communities. As noted in DEIR Section 4.2, Candidate Sites W4G3S13 and W4G4S36, which would be removed under this alternative to demonstrate compliance with the MARB/IPA ALUCP, are located within the Stephens Kangaroo Rat Habitat Conservation Plan (SKR HCP) boundary and would be subject to payment of mitigation fees in conformance with Riverside County Ordinance 633.10, Stephens' Kangaroo Rat Mitigation Fee Ordinance. However, with mitigation fee payment to the County and compliance with the SKR HCP, full mitigation in compliance with regulatory requirements would be granted. Candidate Sites W5G1S16, W5G1S19, and W5G3S12 do not support sensitive biological resources; refer to Section 4.2. Thus, exclusion of these sites under the "Impacted Sites Excluded" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning biological resources. (DEIR page 6-13)
Cultural and Tribal Cultural Resources	This alternative would avoid the Project's significant and unavoidable impacts to City-designated Historic Landmarks and City-designated Structures/Resources of Merit occurring on Candidate Sites W5G1S16 and W5G3S12, respectively. Additionally, this alternative would avoid the Project's mitigated impacts to City-designated Arlington Village Commercial Neighborhood Conservation Area resulting from future development of Candidate Site W5G1S19. Thus, the "Impacted Sites Excluded" Alternative would be considered environmentally superior to the proposed Project concerning cultural and tribal cultural resources. (DEIR page 6-13)
Greenhouse Gas Emissions	Given the scope, scale, and overall buildout associated with the proposed Project, exclusion of the above-mentioned sites would not avoid the Project's significant and unavoidable impacts concerning GHG emissions. Thus, the "Impacted Sites Excluded" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning GHG emissions. (DEIR page 6-13)
Hazards and Hazardous Materials	The "Impacted Sites Excluded" Alternative would involve comparable impacts to hazards and hazardous materials, particularly during construction. However, the "Impacted Sites Excluded" Alternative would reduce the Project's (mitigated) less than significant impacts concerning compatibility with the MARB/IPA ALUCP, as this alternative would avoid siting multifamily residential uses within MARB/IPA ALUCP Compatibility Zone C2, Flight Corridor Zone. As discussed in Section 4.5, Project-related impacts concerning compatibility with the MAB/IPA ALUCP would be reduced to less than significant through conformance with Mitigation Measure HAZ-5, which requires exclusion of Candidate Sites W4G3S13 and W4G4S36 from the proposed Project (i.e., Tool H-21, Rezoning Program). Thus, the "Impacted Sites Excluded" Alternative

[13] Refer to DEIR pages 6-12 to 6-14.

Threshold	Impacts
	would be considered neither environmentally superior nor inferior to the proposed Project concerning hazards and hazardous materials. (DEIR page 6-13)
Land Use and Planning	Exclusion of the above-mentioned candidate sites would not avoid the proposed Project's significant and unavoidable impact concerning exceedances of SCAG adopted growth forecasts, based on the inherently growth-inducing nature of large scale planning efforts, such as a housing element. For this reason, this alternative would also involve a significant and unavoidable land use impact, as it would conflict with SCAG adopted growth forecasts. Thus, the "Impacted Sites Excluded" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning land use and planning. (DEIR page 6-14)
Noise	Site-specific development accommodated under the "Impacted Sites Excluded Only" Alternative would involve comparable construction-related and operational noise impacts following compliance with the established regulatory framework and specified Mitigation Measures NOI-1 through NOI-3 and would not avoid the project's significant and unavoidable traffic noise impacts under Existing Plus Project Conditions, Future Plus Project Conditions, and Cumulative Conditions. Thus, the "Impacted Sites Excluded" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning noise. (DEIR page 6-14)
Public Services and Recreation	The "Impacted Sites Excluded" Alternative would involve comparable public services and recreation impacts as the proposed Project, following compliance with the established regulatory framework and GP 2025 FPEIR Mitigation Measures PS-1, REC-1, and REC-2. Thus, the "Impacted Sites Excluded" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning public services and recreation. (DEIR page 6-14)
Transportation and Traffic	Based on the inherently traffic-inducing nature of large scale planning efforts such as a housing element, removal of the abovementioned candidate sites (which would represent an additional of 9,916 DU and 5.7 million SF of non-residential development above existing conditions) would not avoid the proposed Project's significant and unavoidable transportation and traffic impacts. Thus, the "Impacted Sites Excluded" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning transportation and traffic. (DEIR page 6-14)
Utilities and Service Systems	The "Impacted Sites Excluded" Alternative would involve comparable utilities and service systems impacts as the proposed Project, following compliance with the established regulatory framework and GP FPEIR Mitigation Measures UTL-1, UTL-2, and UTL-4. Thus, the "Impacted Sites Excluded" Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning utilities and service systems. (DEIR page 6-14)

Relationship to Project Objectives

The "Impacted Sites Excluded" Alternative would achieve all the Project Objectives and Goals specified in DEIR Section 6.2.

Finding

The City Council rejects the "Impacted Sites Excluded" Alternative as a project alternative based on the following factors, each of which individually provides sufficient justification for rejection of this alternative: (1) Removal of the abovementioned candidate sites would result in slightly fewer construction-related and operational impacts and would avoid all impacts to City of Riverside-designated Historic Landmarks (Candidate Site W5G1S16) and Structures/Resources of Merit (Candidate Site W5G3S12), and all impacts concerning compliance with the MARB/IPA Airport Land Use Compatibility Plan (ALUCP) (Candidate Sites W4G3S13 and W4G4S36). However, implementation of this alternative would exclude these sites from the Rezoning Program, thus, preventing the City from accommodating their RHNA "fair share" of the region's housing needs, which is required by State law. (2) Through the City's deliberation process, additional sites have been excluded from the Rezoning Program for assorted reasons, including among others, candidate sites that have been partially developed/entitled, since the time they were initially considered as candidates for rezoning. Also, yet additional sites could be identified, as the City continues

their deliberation process. With each excluded site, the City's ability to accommodate their RHNA fair share is further compromised. (3) Finally, the Project's identified significant and unavoidable impacts related to air quality, greenhouse gas emissions, land use and planning, noise, and transportation and traffic would not be avoided and would occur also under this alternative.

Facts and Supporting Information

This alternative would avoid all impacts to Arlington Village Commercial Neighborhood Conservation Area Contributors and concerning compliance with the MARB/IPA ALUCP. Additionally, this alternative would avoid all impacts to City of Riverside-designated Historic Landmarks and Structures/Resources of Merit. However, in doing so, this alternative would not rezone these sites and thus would prevent the City from accommodating their RHNA "fair share" of the region's housing needs. Accommodating their RHNA "fair share" of the region's housing needs is required by State law, thus, this alternative is rejected.

5.4 Identification of No Project Alternative

The No Project Alternative is addressed to compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. "No project" can be interpreted as no development or maintaining the existing condition. This analysis is required pursuant to CEQA Guidelines Section 15126.6(e) and represents the analysis of the "No Project" Alternative, above.

"No project" can also be interpreted as development under an adopted plan. CEQA Guidelines Section 15126.6(e)(3)(A) states:

> When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or operation into the future. Typically, this is a situation where other projects initiated under the existing plan will continue while the new plan is developed.

The "No Project" Alternative, as discussed above, the existing conditions (at the time the Notice of Preparation is published (April 12, 2017)), as well as what would be reasonably expected to occur in the foreseeable future, if the Project were not approved, based on current plans and consistent with available infrastructure and community services.

5.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify the "environmentally superior alternative" based on the evaluation of the project and its alternatives. Considerations relevant to the identification and discussion of the environmentally superior alternative include a proposal which contemplates less development than the proposed project and which correspondingly reduces most or all the proposed project's adverse environmental impacts. DEIR Table 6-1, Comparison of Alternatives, summarizes the comparative analyses presented above (i.e., the Alternatives compared to the proposed Project).

The "No Project" Alternative is the environmentally superior alternative, because it would avoid the proposed Project's impacts (DEIR pages 6-16 to 6-17). Therefore, in compliance with CEQA requirements, an environmentally superior alternative among the other alternatives is identified below.

Among the other alternatives, the environmentally superior alternative is the "Vacant Sites Only," given it would achieve the greatest impact reductions in various environmental issue areas. However, the "Vacant Sites Only" Alternative would not satisfy most of the Project Objectives and Goals specified in DEIR Section 6.2 (page 6-2). Most notably, it would not meet the Project's objective to accommodate the City's remaining RHNA allocation of 4,767 DU.

6.0 Statement of Overriding Considerations

INTRODUCTION

CEQA Guidelines Section 15093 provides the following:

a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

The City Council, having reviewed and considered the information contained in the Environmental Impact Report (EIR) for the 2014 – 2021 Housing Element Update Housing Implementation Plan (the Project), Responses to Comments and the public record, adopts the following Statement of Overriding Considerations that have been balanced against the unavoidable adverse impacts in reaching a decision on this Project.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Although all potential Project impacts have been substantially avoided or mitigated as described in the preceding findings, there is no complete mitigation for the following Project impacts:

Air Quality

- *Short-term Construction Impacts*: Construction-related air quality impacts associated with the future development would be significant and unavoidable despite implementation of proposed Mitigation Measures AQ-1, AQ-2, and AQ-3.

- *Long-term Operational Impacts*: Operational air quality impacts associated with the future development would be significant and unavoidable despite implementation of proposed Mitigation Measure AQ-4.

- *Localized Pollutant Concentrations*: Although future development would be required to comply with the City of Riverside General Plan 2025 (GP 2025) Air Quality Element's objectives and policies, as well as all South Coast Air Quality Management District (SCAQMD) rules and regulations, operational on-site area emissions would exceed the LSTs for PM10 at a distance of 25 to 200 meters, and at all distances (i.e., 25 to 500 meters to the nearest receptor) for PM2.5.
- *Cumulative Air Quality Impacts*: The Project would result in significant and unavoidable impacts for air quality plan consistency, long-term air emissions, and pollutant concentrations, and thus would involve cumulatively considerable air quality impacts despite compliance with proposed Mitigation Measures AQ-1 through AQ-6, GP 2025 Air Quality Element policies, and applicable SCAQMD rules and regulations.

Cultural and Tribal Cultural Resources

- *Historical Resources*: Future development would cause a substantial adverse change in the significance of one (1) City of Riverside-designated Structure/Resource of Merit located at 3035 Van Buren Boulevard (Candidate Site W5G3S12) and three (3) City of Riverside-designated Historic Landmarks located at 9262 Magnolia Avenue, 9204 Magnolia Avenue, and 9216-9258 Magnolia Avenue (Candidate Site W5G1S16) despite compliance with proposed Mitigation Measures CUL-1 through CUL-4, as well as Riverside Municipal Code Title 20, Historical Resources (RMC Title 20) and applicable GP 2025 policies.

Greenhouse Gas Emissions

- *Greenhouse Gas (GHG) Emissions*: Project implementation would result in significant and unavoidable impacts concerning GHG emissions, compliance with the City's Climate Action Plan (CAP), and cumulative GHG emissions, despite implementation of proposed Mitigation Measure GHG-1 and compliance with applicable GP 2025 and CAP policies.

Land Use and Planning

- *Southern California Association of Governments (SCAG) Adopted Growth Forecasts*: Future development accommodated through Project implementation would result in significant and unavoidable impacts concerning land use and planning, as it would cause SCAG adopted growth forecasts to be exceeded.

Noise

- *Long-term Noise Impacts*: Under Existing Plus Project Conditions, Future Plus Project Conditions, and Cumulative Conditions, the Project would result in significant and unavoidable traffic noise impacts despite implementation of mitigation.

Traffic and Transportation

- *Existing (2017) Plus Project Conditions*: Under Existing (2017) Plus Project Conditions, the significance thresholds would be exceeded given there would be no feasible mitigation for the following Roadways:

    - #2 - Alessandro Boulevard (North of Via Vista Drive);
    - #8 - Indiana Avenue (East of Harrison Street);
    - #9 - Jackson Street (North of Indiana Avenue); and
    - #31 - Van Buren Boulevard (North of Arlington Avenue).

    Therefore, impacts to these roadway segments would be considered significant and unavoidable, under Existing (2017) Plus Project Conditions.

- *Cumulative/Future (2040) Plus Project Conditions*: Under Cumulative/Future (2040) Plus Project Conditions, the significance thresholds would be exceeded given there would be no feasible mitigation for the following Roadways:

    - #1 Alessandro Boulevard (East of Mission Grove Parkway);
    - #2 - Alessandro Boulevard (North of Via Vista Drive);
    - #3 Alessandro Boulevard (West of Sycamore Canyon Boulevard);
    - #8 - Indiana Avenue (East of Harrison Street);
    - #9 - Jackson Street (North of Indiana Avenue);

- #31 - Van Buren Boulevard (North of Arlington Avenue); and
- #33 - Van Buren Boulevard (North of Jurupa Avenue).

Therefore, impacts to these roadway segments would be considered significant and unavoidable, under Cumulative/Future (2040) Plus Project Conditions.

Details of these significant unavoidable adverse impacts were discussed in the EIR and are summarized, or were otherwise provided in Section 4.0, *Environmental Impact Findings*, above.

OVERRIDING CONSIDERATIONS

To the extent that the Project's significant effects are not avoided or substantially lessened to below a level of significance, City Council, having reviewed and considered the information contained in the EIR and the public record, and having balanced the Project's benefits against the unavoidable effects which remain, finds that such unmitigated effects to be acceptable in view of the following overriding considerations:

1) The City of Riverside finds that all feasible mitigation measures have been imposed to reduce Project impacts to less than significant levels.

2) The Project includes the various actions (tools), which are necessary to implement the Housing Element Objectives and Policies. The Project's proposed rezoning and the anticipated future development are needed to comply with State Law by ensuring the City accommodates their RHNA "fair share" of the region's housing needs. The Project furthers the Housing Element objective of providing adequate and affordable housing for Riverside residents of all income levels, and identifying and accommodating segments of the City population with special housing needs.

3) In compliance with current State housing law, the proposed Project would amend Riverside Municipal Code Title 19, *Zoning*, to amend the City's Site Plan Review and Design Review permit requirements, R-3-1500 and R-4 Multi-Family Residential Zones development standards, and the MU-U and MU-V Zones to ensure multi-family residential uses are allowed "by right" in these zones, and reduce/minimize barriers to multi-family residential development in these zones. The Project would also amend the Zoning Code to permit supportive and transitional housing the same as any other residential use in zones where residential uses are permitted to comply with State Senate Bill 2 (SB2). In compliance with AB 2634, the Project would amend the Zoning Code to define Single Room Occupancy (SRO) units and permit them with a conditional use permit within the MU-U Zone only.

4) The Project consists of a comprehensive review and update to the existing City of Riverside Housing Element, a required General Plan component. Project implementation would provide additional opportunities for the City to implement the goals, policies, and/or implementation tools identified by the existing General Plan.

5) The Project represents an opportunity for the City of Riverside to improve transit-oriented and pedestrian-friendly development patterns. Project implementation would include a variety of mixed-uses, providing land use patterns that greatly influence traffic patterns and volumes. High-density mixed-uses such as are proposed offer greater opportunity to take transit (or walk or combine shorter trips), than do spread out/low density uses that are separate from essential goods and services, resulting in increased number and length of trips.

6) Future development accommodated through Project implementation would provide a positive contribution to the maintenance and expansion of the City's economic base as development typically increases the City's: business license taxes, utility user taxes, property taxes, and sales taxes. Future development would benefit the local economy by providing jobs and encouraging the investment of local resources in local projects. Specifically, future development would provide

local jobs during both construction and operation. An increased economic base would provide the City with resources to provide high-quality services to its residents.

Candidate sites selected as part of the Housing Element were developed with extensive community outreach and parcel-specific data to identify areas that can accommodate the City's housing needs. Among other factors, the candidate sites chosen as part of the 2014-2021 Housing Element Update Housing Implementation Plan were carefully selected based on their ability to support future development, particularly concerning possessing a minimum lot size for multi-family residential development. Sites already possessing infrastructure and utility connection points, or located near existing infrastructure and utility connection points, were favored over those that did not. In addition, the City's site selection process attempted to avoid the following constraints to development: RMC-designated arroyo areas; multiple Airport Land Use Compatibility Zones, including those associated with the MARB/IPA, Riverside Municipal Airport, and Flabob Airport; several RMC-protected historic districts; local voter-approved agricultural areas; open space areas; current long-range planning efforts (i.e., Northside Specific Plan and Hunter Business Park Specific Plan); and industrial uses.

7) Future development accommodated through Project implementation has the potential to revitalize the visual character and quality of partially developed and developed uses within the City through redevelopment, reversing the spread of blight and deterioration and improving community pride and safety. Project implementation would revitalize older areas of the City to ensure tax dollars are no longer diverted to meet the demands of blighted areas.

8) Although significant impacts will remain, the City of Riverside will mitigate any significant adverse impacts to air quality, cultural and tribal cultural resources, greenhouse gas emission, land use and planning, noise, and traffic and transportation to the maximum extent practicable.

In its decision to approve the Project, the City Council has considered the project benefits to outweigh the environmental impacts.

10.0 MITIGATION MONITORING AND REPORTING PROGRAM

The mitigation measures that will be implemented to avoid/reduce the Project's potential environmental impacts are specified in DEIR Section ES and Section 4.0. Public Resources Code (PRC) Section 21081.6 requires a public agency to adopt a monitoring and reporting program for assessing and ensuring compliance with any required mitigation measures applied to the proposed development:

> *. . . the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted, or made a condition of project approval, in order to mitigate or avoid significant effects on the environment.*

PRC Section 21081.6 provides general guidelines for implementing mitigation monitoring programs and indicates that specific reporting/monitoring requirements, to be enforced during Project implementation, must be defined before Final EIR certification.

The following mitigation monitoring table lists mitigation measures that can be included as conditions of approval for the Project. These measures correspond to those outlined in DEIR Section ES and Section 4.0. To ensure that the mitigation measures are properly implemented, a Mitigation Monitoring and Reporting Program (MMRP) has been prepared to identify the timing and responsibility for monitoring each measure. The City of Riverside will have the primary responsibility for monitoring and reporting implementation of the mitigation measures.

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MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure No.	Mitigation Measure	Implementing Party	Phase / Timing			Responsible Party	Completed		Comments
			Pre-Con[1]	During Con	Post-Con		Initials	Date	
Air Quality									
AQ-1	In accordance with SCAQMD Rule 403, the contractor shall control excessive fugitive dust emissions during construction through regular watering or other dust prevention measures, and through compliance with SCAQMD Rule 402, which requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. As specified in the SCAQMD's Rules and Regulations, the following shall be implemented during construction: • All active portions of the construction site shall be watered every three hours during daily construction activities and when dust is observed migrating from the construction site to prevent excessive amounts of dust. • A construction relations officer shall be appointed to act as a community liaison concerning on-site construction activity including resolution of issues related to particulate matter generation. • During daily construction activities, unpaved access roads, parking areas, and staging areas shall be paved or water shall be applied every three hours, non-toxic soil stabilizers applied. More frequent watering shall occur if dust is observed migrating from the site during site disturbance. • Any on-site stockpiles of debris, dirt, or other dusty material shall be enclosed, covered, watered twice daily, or non-toxic soil binders shall be applied. • All grading and excavation operations shall be suspended when wind speeds exceed 25 miles per hour. • Disturbed areas shall be replaced with ground cover or paved immediately after construction is completed in the affected area. • Track-out devices such as gravel bed track-out aprons (3 inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes) shall be provided to reduce mud/dirt trackout from unpaved truck exit routes. Alternatively, a wheel washer shall be used at truck exit routes. • On-site vehicle speed shall be limited to 15 miles per hour. • Before departing the construction site, all material to be transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust. • Construction trucks shall be rerouted away from congested streets or sensitive receptor areas.	Project Contractors		✓		Public Works Department			

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MITIGATION MONITORING AND REPORTING PROGRAM

<table>
<tr><th rowspan="2">Mitigation Measure No.</th><th rowspan="2">Mitigation Measure</th><th rowspan="2">Implementing Party</th><th colspan="3">Phase / Timing</th><th rowspan="2">Responsible Party</th><th colspan="2">Completed</th><th rowspan="2">Comments</th></tr>
<tr><th>Pre-Con[1]</th><th>During Con</th><th>Post-Con</th><th>Initials</th><th>Date</th></tr>
<tr><td></td><td>• Construction drawings shall specify SCAQMD Rule 402 and Rule 403 requirements.</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>AQ-2</td><td>To reduce ROG emissions resulting from application of architectural coatings, the contractor for future development exceeding the SCAQMD construction thresholds shall implement the following measures during construction:
• High-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent shall be used;
• Coatings and solvents used shall have a ROG content lower than required under Rule 1113; and
• Pre-painted construction materials shall be used.</td><td>Project Contractors</td><td></td><td>✓</td><td></td><td>Public Works Department</td><td></td><td></td><td></td></tr>
<tr><td>AQ-3</td><td>Construction-Related Emissions. Prior to demolition, grading, or building permit approval, and in accordance with SCAQMD's promulgated methodology protocols, an Air Quality Assessment for Construction-Related Emissions shall be prepared for projects that would exceed the development scenario of 774 DU and 878,720 SF non-residential uses, or the exclusively residential scenario of 1,007 DU, and that would exceed the following SCAQMD significance thresholds for construction-related emissions (or those in place at the time of the development application). Future development shall mitigate construction-related emissions to below SCAQMD's thresholds of significance.
<table>
<tr><th rowspan="2">Phase</th><th colspan="5">Pollutant (lbs/day)</th></tr>
<tr><th>VOC</th><th>NO_X</th><th>CO</th><th>SO_X</th><th>PM_{10}</th></tr>
<tr><td>Construction-Related</td><td>75</td><td>100</td><td>550</td><td>150</td><td>150</td></tr>
<tr><td colspan="6">CO = carbon monoxide; VOC = volatile organic compounds; NO_X = nitrogen oxides; PM_{10} = particulate matter s microns; $PM_{2.5}$ = particulate matter smaller than 2.5 microns</td></tr>
<tr><td colspan="6">Source: South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993. Revised November</td></tr>
</table></td><td>Air Quality Specialist</td><td>✓</td><td></td><td></td><td>Planning Division</td><td></td><td></td><td></td></tr>
<tr><td>AQ-4</td><td>Operational Emissions. Prior to demolition, grading, or building permit approval, and in accordance with SCAQMD's promulgated methodology protocols, an Air Quality Assessment for Operational Emissions shall be prepared for multi-family residential projects proposing 541 dwelling units or more that would exceed the following SCAQMD thresholds of significance for operational emissions (or those in place at the time of the development application). Future development shall mitigate operational emissions to below SCAQMD's thresholds of significance.</td><td>Air Quality Specialist</td><td>✓</td><td></td><td></td><td>Planning Division</td><td></td><td></td><td></td></tr>
</table>

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MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure No.	Mitigation Measure	Implementing Party	Phase / Timing: Pre-Con[1]	Phase / Timing: During Con	Phase / Timing: Post-Con	Responsible Party	Completed: Initials	Completed: Date	Comments
	<table><tr><th rowspan="2">Phase</th><th colspan="6">Pollutant (lbs/day)</th></tr><tr><th>VOC</th><th>NO_X</th><th>CO</th><th>SO_X</th><th>PM_{10}</th><th></th></tr><tr><td>Operations</td><td>55</td><td>55</td><td>550</td><td>150</td><td>150</td><td></td></tr><tr><td colspan="7">CO = carbon monoxide; VOC = volatile organic compounds; NO_X = nitrogen oxides; PM_{10} = particulate matter small microns; $PM_{2.5}$ = particulate matter smaller than 2.5 microns</td></tr><tr><td colspan="7">Source: South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993. Revised November 199</td></tr></table>								
AQ-5	A project-specific Health Risk Assessment shall be conducted for future residential development proposed within 500 feet of the SR-91 freeway right-of-way, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. The Health Risk Assessment shall evaluate a project per the following SCAQMD thresholds: • Cancer Risk: Emit carcinogenic or toxic contaminants that exceed the maximum individual cancer risk of 10 in one million. • Non-Cancer Risk: Emit toxic contaminants that exceed the maximum hazard quotient of one in one million. The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Noncarcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). An REL is a concentration at or below which health effects are not likely to occur. A hazard index less of than one (1.0) means that adverse health effects are not expected. If projects are found to exceed the SCAQMD's Health Risk Assessment thresholds, mitigation shall be incorporated to reduce impacts to below SCAQMD thresholds.	Air Quality Specialist	✓			Planning Division			
AQ-6	Future residential development shall not be located closer than 1,000 feet from any existing or proposed distribution center/warehouse facility which generates a minimum of 100 heavy truck trips per day, or 40 truck trips with transport refrigeration units (TRUs) per day, or TRU operations exceeding 300 hours per week, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. If future residential development cannot meet this setback, a project-	Air Quality Specialist	✓			Planning Division			

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MITIGATION MONITORING AND REPORTING PROGRAM									
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			Pre-Con[1]	During Con	Post-Con		Initials	Date	
	specific Health Risk Assessment shall be prepared to evaluate a project for the SCAQMD thresholds (i.e., carcinogenic risk equals or exceeds 10 in one million; acute non-carcinogenic hazard index equals or exceeds one; and/or if chronic non-carcinogenic hazard index equals or exceeds one, as outlined above). If projects are found to exceed the SCAQMD's Health Risk Assessment thresholds, mitigation shall be incorporated to reduce impacts to below SCAQMD thresholds.								
Biological Resources									
GP FPEIR MM BIO-1	To reduce potential direct and indirect impacts to Federal Species of Concern, California Species of Special Concern, California Species Animals or plants listed on the lists one through four of the California Native Plant Society (CNPS) Inventory not covered under the MSHCP, a habitat assessment shall be prepared by a qualified biologist for projects located on undeveloped sites with potential to impact these species. The report shall specify mitigation to avoid or reduce potential impacts to less than significant. • If the findings of the habitat assessment show no sensitive species or suitable habitat exists on site, then no additional surveys or mitigation measures are required. • If the potential for sensitive species exists or suitable habitat exists on site, focused surveys or mitigation, if identified in the habitat assessment, shall be completed. Focused surveys conducted in the appropriate season for each species, as identified in the habitat assessment report, shall be conducted to determine presence/absence status. • If no sensitive species are identified through focused surveys, then no additional surveys or mitigation measures are required. • If sensitive species are found on site and are not avoided by project design, then additional mitigation measures as recommended by a qualified biologist shall be implemented to avoid or reduce impacts to less than significant.	Qualified Biologist	✓			Planning Division			
BIO-1	Prior to demolition, grading, or building permit approval of candidate sites located within areas that could impact riparian/riverine habitat or federally protected wetlands as defined by California Fish and Game Code 1600 et seq. and Clean Water Act Sections 401 and 404, a qualified biologist shall prepare an assessment. The assessment shall include, at a minimum, identification and mapping of any wetland or riparian/riverine resources present; evaluation of plant species composition; a soils analysis (where appropriate); avoidance and impacted wetland/riparian/riverine areas; and applicable mitigation measure(s) to avoid or reduce impacts to these resources to less than significant.	Qualified Biologist	✓			Planning Division			
BIO-2	Prior to demolition, grading, or building permit approval, the project proponent shall provide written notification to the Community & Economic Development Department that the alteration of any water	Project Proponent	✓			Community &			

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MITIGATION MONITORING AND REPORTING PROGRAM									
Mitigation Measure No.	Mitigation Measure	Implementing Party	Phase / Timing			Responsible Party	Completed		Comments
			Pre-Con[1]	During Con	Post-Con		Initials	Date	
	course or wetland, located either onsite or on any required offsite improvement areas, complies with California Fish and Game Code and U.S. Army Corps of Engineers' review and approval per California Fish and Game Code Section 1600 et seq. and Clean Water Act Sections 401 and 404. Copies of the approval from the relevant agencies shall be submitted to the Community & Economic Development.					Economic Development Department			
BIO-3	Prior to demolition, grading, or building permit approval, an assessment/jurisdictional delineation by a qualified biologist shall be prepared and submitted to the Planning Division for review and approval, for candidate sites located within areas that could impact federally protected wetlands as defined by Clean Water Act Section 404. The assessment shall include, at a minimum, identification and mapping of any wetlands present; evaluation of plant species composition; a soils analysis (where appropriate); avoidance and impacted wetland areas; and applicable mitigation measure(s) for proposed impacts to wetlands. The project proponent shall provide written notification to the Community & Economic Development Department that the alteration of any water course or wetland, located either onsite or on any required offsite improvement areas, complies with the U.S. Army Corps of Engineers Section 404 Nationwide permitting requirements. Copies of any agreements along with the notification shall be submitted to the Community & Economic Development.	Qualified Biologist Project Proponent	✓			Planning Division Community & Economic Development Department			
Cultural and Tribal Cultural Resources									
GP FPEIR MM Cultural 1	Candidate sites with high archaeological sensitivity shall be surveyed for archaeological resources by qualified individuals who meet the Secretary of the Interior's Standards and Guidelines regarding archaeological activities and methods. If potentially significant prehistoric archaeological resources are encountered during the archaeological survey, these shall be analyzed/processed managed in accordance with State and City regulations.	Qualified Archaeologist	✓			Planning Division			
GP FPEIR MM Cultural 2	Avoidance is the preferred treatment for known prehistoric and historical archaeological sites and sites containing Native American human remains. Where feasible, project plans shall be developed to avoid known archaeological resources and sites containing human remains. Where avoidance of construction impacts is possible, the site shall be landscaped in a manner which will ensure that indirect impacts from increased public availability to these sites are avoided. Where avoidance is selected, archaeological resource sites and sites containing Native American human remains shall be placed within permanent conservation easements or dedicated open space areas.	Project Applicant	✓			Planning Division			
GP FPEIR MM	In accordance with the law, avoidance and/or preservation in place of known prehistoric and historical archaeological resources and sites containing Native American human remains are not feasible management options, the following mitigation measures shall be initiated:	Qualified Archaeologist	✓	✓		Planning Division			

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MITIGATION MONITORING AND REPORTING PROGRAM									
Mitigation Measure No.	Mitigation Measure	Implementing Party	Phase / Timing			Responsible Party	Completed		Comments
			Pre-Con[1]	During Con	Post-Con		Initials	Date	
Cultural 3	a. Prior to demolition, grading, or building permit approval for a project, a Phase II (i.e., test-level) Research Design shall be developed detailing how the archaeological resources investigation will be executed and providing specific research questions that will be addressed through the Phase II Testing Program. The Phase II Testing Program shall be designed to define site boundaries further and assess the structure, content, nature, and depth of subsurface cultural deposits and features. Emphasis shall also be placed on assessing site integrity, cultural significance and the site's potential to address regional archaeological research questions. These data shall be used for two purposes: to discuss culturally sensitive recovery options with the appropriate Tribe(s) if the resource is of Native American origins, and to address the California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP) eligibility for the cultural resource and make recommendations as to the suitability of the resource for listing on either Register. The Research Design shall include measures in compliance with the established regulatory framework to reduce impacts to less than significant. For sites determined ineligible for listing on either the CRHR or NRHP, execution of the Phase II Testing Program would suffice as the necessary level of data recovery and mitigation of project impacts to this resource. b. A participant-observer from the appropriate Native American Band or Tribe shall be used during all archaeological excavations involving sites of Native American concern. c. Prior to demolition, grading, or building permit approval, the City's consultant shall complete the Phase II Testing Program as specified in the Research Design. The results of this Program shall be presented in a technical report that follows the County of Riverside's Phase II Cultural Resources Testing & Evaluation Standard Scope of Work. The Phase II Report shall be submitted to the appropriate Tribe and the City's Cultural Heritage Board. d. If the cultural resource is identified as being potentially eligible for either the CRHR or NRHP, a Phase III Data Recovery Program to mitigate project effects shall be initiated. The Data Recovery Treatment Plan detailing the Phase III Program objectives shall be developed, in consultation with the appropriate Tribe, and contain specific testable hypotheses pertinent to the Research Design and relative to the sites under study. The Phase III Data Recovery Treatment Plan shall be submitted to the City's Cultural Heritage Board and/or Cultural Heritage Board staff and the appropriate Tribe. e. After Treatment Plan completion, the Phase III Data Recovery Program for affected, eligible sites shall be completed. Typically, a Phase III Data Recovery Program involves the excavation of a statistically representative sample of the site to preserve those resource	Project Proponent							

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MITIGATION MONITORING AND REPORTING PROGRAM									
Mitigation Measure No.	Mitigation Measure	Implementing Party	Phase / Timing			Responsible Party	Completed		Comments
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	values that qualify the site as being eligible for listing on the CRHR or NRHP. A participant-observer from the appropriate Native American Band or Tribe shall be used during archaeological data-recovery excavations involving sites of Native American concern. At the Phase III Program's conclusion, a Phase III Data Recovery Report shall be prepared, following the County of Riverside's Outline for Archaeological Mitigation or Data Recovery. The Phase III Data Recovery Report shall be submitted to the appropriate Tribe and the City's Cultural Heritage Board. f. All archaeological materials recovered during Phase II Testing or Phase III Data Recovery program implementation shall be subject to analysis and/or processing as outlined in the Treatment Plan. If materials are of the type, which will be transferred to a curation facility, they shall be cleaned, described in detail, and analyzed including laboratory and analytical analysis. Materials to be curated may include archaeological specimens and samples, field notes, feature and burial records, maps, plans, profile drawings, photo logs, photographic negatives, consultants' reports of special studies, and copies of the final technical reports. All project related collections subject to curation should be suitably packaged and transferred to facility that meets the standards of 36 CFR 79 for long-term storage. Culturally sensitive treatment of certain artifacts may require treatment other than curation and as specified in the Treatment Plan, but it should be noted that Native American Graves Protection Repatriation Act (NAGPRA) provisions pertaining to Native American burials, sacred objects, and objects of cultural patrimony would come into effect when ownership of the collections transfer to a curation repository that receives Federal funding, unless otherwise agreed to with non-curation methods of treatment. g. The project proponent shall bear the expense of identification, evaluation, and treatment of all cultural resources directly or indirectly affected by project-related construction activity. Such expenses may include, archaeological and Native American monitoring, pre-field planning, field work, post-field analysis, research, interim and summary report preparation, and final report production (including draft and final versions), and costs associated with the curation of project documentation and the associated artifact collections. On the City and the project proponent's behalf, the final technical reports detailing the Phase II Testing or Phase III Data Recovery programs results shall be submitted to the appropriate Native American Tribe and to the California Historical Resources Information System (CHRIS) Eastern Information Center (EIC) for their information and where it would be available to other researchers.								

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GP FPEIR MM Cultural 4	The following mitigation measures shall be implemented to reduce project-related adverse impacts to archaeological resources and sites containing Native American human remains that may be inadvertently discovered during construction of projects proposed in the City's 2014-2021 Housing Element Update: a. In areas of archaeological sensitivity, including those that may contain buried Native American human remains, a registered professional archaeologist and the culturally affiliated Native American Tribe's representative, with knowledge in cultural resources, shall monitor all project-related ground disturbing activities that extend into natural sediments in areas determined to have high archaeological sensitivity. b. If buried archaeological resources are uncovered during construction, all work shall be halted in the discovery's vicinity until a registered professional archaeologist can visit the site of discovery and assess the archaeological resource's significance and origin. If the resource is determined to be of Native American origin or a potentially significant cultural resource, these shall be analyzed/processed in accordance with State and local regulations, which may include data recovery, retention in situ, or other appropriate treatment and mitigation depending on the resources discovered. c. In the event of an accidental discovery of any human remains in a location other than a dedicated cemetery, the steps and procedures specified in Health and Safety Code 7050.5, CEQA Guidelines 15064.5(e), and Public Resources Code 5097.98 must be implemented. Specifically, in accordance with Public Resources Code (PRC) Section 5097.98, the Riverside County Coroner must be notified within 24 hours of the discovery of potentially human remains. The Coroner will then determine within two working days of being notified if the remains are subject to his or her authority. If the Coroner recognizes the remains to be Native American, he or she shall contact the Native American Heritage Commission (NAHC) by phone within 24 hours, in accordance with PRC Section 5097.98. The NAHC will then designate a Most Likely Descendant (MLD) with respect to the human remains within 48 hours of notification. The MLD then has the opportunity to recommend to the property owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and associated grave goods within 48 hours of notification. Whenever the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation, or the landowner or his or her authorized representative rejects the MLD's recommendation and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized	Grading Contractors Registered Professional Archaeologist		✓		Planning Division			

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	representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.								
GP FPEIR MM Cultural 5	To address potential impacts to historic resources that may be adversely affected by future development allowed by the proposed project, mitigation including, but not limited to, the following shall be considered: For adverse impacts to individual historic resources, such as: those on the National Register, California Register or City Landmark, Structure of Merit eligible, mitigation considered shall include the following in the order of preference: a. Avoidance. b. Changes to the structure provided pursuant to the Secretary of Interior's Standards. c. Structure relocation. d. Structure recordation to HABS/HAER standard if demolition is allowed. For adverse impacts to a City designated Historic District, mitigation considered shall include, but not limited to, in order of preference: a. Avoidance. b. Property recordation to HABS/HAER standard if demolition is allowed. c. Demolition is to be considered only if mitigation as described above is not feasible.	Project Applicant	✓			Planning Division			
GP FPEIR MM Cultural 6	Any application for projects within the Magnolia Avenue Specific Plan (MASP) boundaries for all undeveloped properties and for developed properties where the project application indicates the need for extensive excavation to a depth reaching native (i.e., previously undisturbed) soils, as determined by a geological survey, shall require the following: a. Evaluation of the site by a qualified archaeologist retained by the Project applicant(s), which would include at a minimum a records search, a Phase I walkover survey, and preparation of an archeological report containing the results of this evaluation and specifying the mitigation necessary to avoid or reduce impacts to less than significant, in accordance with State and local regulations. No further action is necessary unless the Phase I survey determines that a Phase II/III survey(s) are necessary. If a Phase II/III are necessary the following conditions shall apply: i. Prior to demolition, grading, or building permit approval, the project applicant shall retain an archaeological monitor to monitor all ground-disturbing activities to identify	Qualified Archaeologist	✓			Planning Division			

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	any unknown archaeological resources. Any newly discovered cultural resource deposits shall be subject to a cultural resources evaluation. b. Prior to demolition, grading, or building permit approval, the project archaeologist shall file a pre- grading report with the City to document the proposed methodology for grading activity observation. Said methodology shall include the requirement for a qualified archaeological monitor to be present and to have the authority to stop and redirect grading activities. In accordance with the agreement required in (c) above, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation with the Tribe(s) in order to evaluate the significance of any archaeological resources discovered on the property. Tribal monitors shall be allowed to monitor all grading, excavation and groundbreaking activities and shall also have the authority to stop and redirect grading activities in consultation with the project archaeologist. c. If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to the origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable timeframe. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant" (MLD). The MLD shall then make recommendations and engage in consultations concerning treatment of the remains as provided in Public Resources Code 5097.98. d. The landowner shall relinquish ownership of all cultural resources, including sacred items, burial goods and all archaeological artifacts that are found on the project to the MLD for proper treatment and disposition. e. All sacred sites shall be avoided and preserved as the preferred mitigation. f. If inadvertent discoveries of subsurface archaeological/ cultural resources are discovered during grading, the Project applicant(s)/developer, the project archaeologist and the Tribe(s) shall assess the significance of such resources and shall meet and confer regarding the mitigation for such resources. If the project applicant and the Tribe(s) cannot agree on the significance or the mitigation for such resources, these items will be presented to the City for decision. The City shall make the determination based on California Environmental Quality								

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	Act (CEQA) requirements with respect to archaeological resources and shall take into account the religious beliefs, customs and practices of the Tribe(s).								
CUL-1	Prior to demolition, grading, or building permit approval, any candidate site with buildings over 45 years in age not subject to previous identification, recordation on Department of Park and Recreation (DPR) 523 Forms, and NRHP, CRHR, and/or City of Riverside-designated Structures/Resources of Merit eligibility evaluation (as appropriate) within the last five years, shall be evaluated by a Secretary of the Interior Qualified Cultural Resource Professional specializing in Architectural History. Results of the evaluation shall specify site-specific mitigation requirements.	Secretary of the Interior Qualified Cultural Resource Professional	✓			Planning Division			
CUL 2	Concurrent with the proposed Zoning Code Map Amendment (Planning Case No. P17-0180), and to avoid potential impacts to previously recorded City of Riverside-designated contributors to the Arlington Village Commercial Neighborhood Conservation Area, Candidate Site W5G1S19 shall be avoided through exclusion (i.e., Tool H-21, Rezoning Program).	Planning Division	✓			Community & Economic Development Department			
CUL-3	To avoid impacts to previously recorded historic resources located within 50 feet of construction activities involving pile driving (if any) on the candidate sites listed below, prior to demolition, grading, or building permit approval for the candidate sites, a site-specific Construction Protection Plan (CPP) shall be prepared by a qualified Historic Building Architect. The CPP shall specify mitigation to avoid or reduce impacts to less than significant.	Qualified Historic Building Architect	✓			Planning Division			

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Nearest Candidate Site	Adjacent Resource and Location
W1G4S03	City of Riverside-Designated Structure/Resource of Merit CHM-648 (3493 Ramona I (adjacent south)
W1G4S44	P-33-11475: Historic-period building (adjacent south)
W2G2S01	City of Riverside-Designated Historic Landmark at 1393 University Avenue (adjacen
W2G2S02	City of Riverside-designated Historic Landmark CHL-052 (Weber House) (adjacent v
W2G2S03	City of Riverside-Designated Structures/Resources of Merit at 1855-1857 University (adjacent east)
W2G2S06	City of Riverside-Designated Historic Landmark at 1651 University Avenue (adjacen
W2G4S30	City of Riverside-Designated Structures/Resources of Merit CHM-091 (2009 Patter's Street) and CHM-090 (2008 Patterson Street) (adjacent west)
W4G4S42	P-33-7818: Historic-period archaeological site (adjacent south)
W5G1S02	City of Riverside-Designated Historic Landmark at 9856 Magnolia Avenue (adjacent
W5G1S13	City of Riverside-Designated Lafayette Street Neighborhood Conservation Area (adj north)
W5G1S19	P-33-9007: Historic-period building (adjacent southeast) P-33-9047: Historic-period building (adjacent southeast) P-33-9048: Historic-period building (adjacent southeast) P-33-9049: Historic-period building (adjacent southeast) P-33-9051: Historic-period building (adjacent southeast) P-33-9052: Historic-period building (adjacent southeast) P-33-11251: Historic-period building (adjacent southwest)
W5G1S11/W5G4S12	P-33-13081: Historic-period building (adjacent south) P-33-13082: Historic-period building (adjacent south) P-33-13083: Historic-period building (adjacent south) P-33-13084: Historic-period building (adjacent south) P-33-16974: Historic-period building (adjacent south)
W5G4S23	P-33-12901: Historic-period building (adjacent northeast)
W6G4S33	P-33-21007: Historic-period building (adjacent south)
W6G4S41	P-33-21007: Historic-period building (adjacent south)
W7G3S14	City of Riverside-Designated Historic Resource CHL-118 (Five Points) (adjacent so

Note: Refer to Appendix D, *Candidate Sites Table*, for a listing and description of the candidate sites.

Source: BCR Consulting, *Cultural Resources Records Search for the City of Riverside 2014-2021 Housing Element Rezoning Progra* A, Records Search Results (One Half-Mile Radius), August 3, 2017.

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	To provide adequate protection to the adjacent previously recorded historic resource, the CPP shall include the following components, pursuant to the National Park Service Preservation Tech Notes, Temporary Protection Number 3, Protecting a Historic Structure During Adjacent Construction: 1. Protocol for consultation between the historic building owner and project applicant to identify potential risks, negotiate changes, and agree upon protective measures; 2. Requirements for documentation of the condition of the adjacent historic building prior to any demolition/construction work, in a manner consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties. 3. Protective measures to be implemented at both the construction site and the historic site. 4. Mitigating the effects of vibrations shall begin during the consultation process when acceptable levels shall be set and alternative processes specified, as required. If vibrations are likely to damage adjacent structures, specific measures to mitigate potential impacts shall be identified during the consultation process. Alternative measures to be considered include the following, among others, as required: • Pile cushioning, jetting, predrilling, cast-in-place systems, or resonance-free vibratory pile drivers; • Hand demolition as a substitute when conventional demolition activities would cause excessive vibrations; • If pile driving is likely to damage adjacent structures, non-displacement piles that are inserted in bored holes rather than driven, "jacking-in" or pressing the piles into the ground, or other equally effective measure; and • Delivery entry and exit points that are located the further distance possible/feasible from the historic site. 5. Procedures for regular monitoring during construction to: identify damage; evaluate the efficacy of protective measures already in place; and identify and implement additional corrective measures, if needed. Continual crack and vibration monitoring shall be provided as a warning system to prevent exceedances of previously established (during the Consultation phase) safe thresholds. 6. All damage to historic structures shall be restored to its preexisting condition.								
CUL-4	To avoid impacts to previously recorded resources located adjacent to candidate sites identified in CUL-3, prior to demolition, grading, or building permit approval for the candidate sites, the project applicant shall substantiate that:	Project Applicant	✓			Community & Economic			

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	• The Contractor conducting work on the construction site has submitted documents pertaining to protection of historic resources (i.e., Construction Protection Plan (CPP)) to the Community & Economic Development Department. • Promotion of CPP awareness among all project participants. • A Worker Historic Resources Awareness Program has been developed for implementation prior to demolition, grading, or building permit approval. The Program shall be implemented to educate all construction personnel (employees of contractors and subcontractors) who work on the project site or related facilities during demolition and construction concerning the adjacent historical resource. The training may be presented on electronic media in the form of a video recording. • The construction plans specify that the Contractor shall not locate any equipment or deliver any materials or commence any work whatsoever that may impact adjacent historic resources. • Each Contractor-Generated Submittal shall include the following: a. General location map of the development site showing where work on the Contract will be performed, including notation on the map of location of the historic resource (s). b. Listing of materials, products or construction equipment to be used in the course of the Contract that have the potential to come in contact with the historic resource, and the proposed methods to be employed to prevent any damage to said historic resources. c. In the event that the Contractor identifies potentially more effective and/or efficient methods of protection as construction proceeds, the Contractor shall provide said measures to the Community & Economic Development Department. Adjustments and modifications shall be documented with the City and on construction drawings.	Project Contractor				Development Department			
CUL-5	If excavation activities include digging deeper than 10 feet below the ground surface, a qualified paleontologist shall be contracted to monitor construction activities. If construction activities uncover potential paleontological (fossil) resources, construction would be temporarily halted within 50 feet of the find until the resources' significance is determined by a qualified paleontologist. The paleontological monitor shall be equipped to salvage fossils as they are unearthed to avoid construction delays, and to remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitors shall have stop-work authority to temporarily halt or divert equipment to allow removal of abundant or large specimens. The paleontologist shall identify and permanently	Qualified Paleontologist Paleontological Monitor		✓		Planning Division			

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	preserve all recovered specimens and facilitate curation into an established, accredited, professional museum repository with permanent retrievable storage. The paleontologist shall have a written repository agreement prior to the initiation of recovery activities. The qualified paleontologist shall complete a report describing the methods and results of the monitoring and data recovery program that shall be submitted to the City.								
Greenhouse Gas Emissions									
GHG-1	GHG Emissions. Prior to demolition, grading, or building permit approval, and in accordance with SCAQMD's promulgated methodology protocols, a Greenhouse Gas Emissions Assessment shall be prepared for multi-family residential developments that would exceed SCAQMD's tiered-approach requirements and the following SCAQMD thresholds of significance (or those in place at the time of the development application). Future development shall mitigate GHG emissions to below SCAQMD's thresholds of significance. • Residential Uses: 3,000 metric tons of CO2 equivalent per year (MTCO2eq/yr); or • Efficiency-Based (through Year 2020): 4.8 MTCO2eq per service population (SP) per year; or • Efficiency-Based (post Year 2020): 3.0 MTCO2eq/SP/year.	Air Quality Specialist	✓			Planning Division			
Hazards and Hazardous Materials									
HAZ-1	Prior to any renovation or demolition or building permit approval, an Asbestos Hazard Emergency Response Act (AHERA) and California Division of Occupational Safety and Health (Cal/OSHA) certified building inspector shall conduct an asbestos survey to determine the presence or absence of asbestos containing-materials (ACMs). If the asbestos survey reveals ACMs, asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 1403 prior to any activities that would disturb ACMs or create an airborne asbestos hazard.	Certified Building Inspector	✓			Planning Division			
HAZ-2	If paint is chemically or physically separated from building materials during structure demolition, the paint waste shall be evaluated independently from the building material by a qualified Environmental Professional. If lead-based paint is found, abatement shall be completed by a qualified lead specialist prior to any activities that would create lead dust or fume hazard. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good	Qualified Environmental Professional		✓		City Project Engineer			

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	worker practices by workers exposed to lead. Contractors performing lead-based paint removal shall provide evidence of abatement activities to the City Project Engineer.								
HAZ-3	Prior to any renovation, or demolition, grading or building permit approval, a formal Phase I Environmental Site Assessment (ESA) shall be prepared for any vacant, commercial, and industrial properties involving hazardous materials or waste. The Phase I ESA shall be prepared in accordance with ASTM Standard Practice E 1527-05 or the Standards and Practices for All Appropriate Inquiry (AAI), prior to any land acquisition, demolition, or construction activities. The Phase I ESA would identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified hazardous materials Environmental Professional with Phase II/site characterization experience prior to land acquisition, demolition, and/or construction. The Environmental Professional shall identify proper remedial activities, if necessary.	Qualified Environmental Professional	✓			Planning Division			
HAZ-4	If the contractor discovers unknown wastes or suspect materials during construction that are believed to involve hazardous waste or materials, the contractor shall: • Immediately cease work in the suspected contaminant's vicinity, and remove workers and the public from the area; • Notify the City's Project Engineer; • Secure the area as directed by the Project Engineer; and • Notify the implementing agency's Hazardous Waste/Materials Coordinator. The Hazardous Waste/Materials Coordinator shall advise the responsible party of further actions that shall be taken, if required.	Project Contractor		✓		City Project Engineer Hazardous Waste/ Materials Coordinator			
HAZ-5	Concurrent with the proposed Zoning Code Map Amendment (Planning Case No. P17-0180), and to avoid potential impacts to March Air Reserve Base/Inland Port Airport operations within Zone C2, Flight Corridor Zone, the following candidate sites shall be avoided through exclusion of these properties from the Project (i.e., Tool H-21, Rezoning Program): W4G3S13; and W4G4S36.	Planning Division	✓			Community & Economic Development Department			
Land Use and Planning									
LU-1	Concurrent with the proposed Zoning Code Map Amendment (Planning Case No. P17-0180), and to avoid potential conflicts with the Riverside Municipal Code and partially developed or entitled sites, the following properties shall be avoided through exclusion of these candidate sites/properties from the Project (i.e., Tool H-21, Rezoning Program):	Planning Division	✓			Community & Economic Developm			

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	• W3G4S11 (entire site); • W3G4S09 (entire site); • W2G2S03 (entire site); • W4G3S13 (entire site); • W4G4S36 (entire site); • W5G1S02 (partial, APN's 234080031, 234080032, 234091012, and 234091013 only); • W5G1S11 (entire site); • W5G1S19 (entire site); • W6G4S17 (partial, APN 143040011 only); • W6G4S20 (partial, APN's 143080026 and 143080032 only); • W6G4S26 (entire site); • W6G4S33 (entire site); • W6G4S34 (entire site); and • W6G4S41 (partial, APN's 145082036, 145161007, 145161004, and 145161008 only).					ent Department			
Noise									
NOI-1	To reduce construction-related noise impacts, Project applicants shall require construction contractors to implement a site-specific Noise Reduction Program, which includes the following measures, ongoing through demolition, grading, and/or construction: • Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds), wherever feasible. • Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electronically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler shall be used (this muffler can lower noise levels from the exhaust by up to approximately 10 dBA). External jackets on the tools themselves shall be used where feasible (this can achieve an approximately 5.0-dBA reduction. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.	Project Applicant Project Contractors		✓		Planning Division			

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	• Stationary construction-related noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and incorporate insulation barriers, or other measures to the extent feasible.								
NOI-2	Prior to demolition, grading, or building permit approval, the project applicant shall submit to the Community & Economic Development Department a list of measures to respond to and track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction. These measures shall include the following: • A procedure and phone numbers for notifying the Community & Economic Development Department and Police Department (during regular construction hours and off-hours); • A requirement for a sign to be posted on-site specifying the permitted construction days and hours and complaint procedures, and who to notify in the event of a problem. The sign shall also include a listing of both the City and construction contractor's telephone numbers (during regular construction hours and off-hours); and • A requirement for a preconstruction meeting to be held with the job inspectors and general contractor/on-site Project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.	Project Applicant	✓			Community & Economic Development Department			
NOI-3	To avoid impacts to vibration sensitive land uses (i.e., non-engineered timber and masonry buildings) located within a 50-foot radius of pile driving activities, prior to demolition, grading, or building permit approval, the following measures shall be specified on the project plans and implemented during construction: • Pile driving within a 50-foot radius of vibration sensitive land uses shall utilize alternative installation methods (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers) such that vibration velocities from the alternative construction activity would fall below the 0.2 the inch/second threshold. • The preexisting condition of all vibration sensitive land uses within a 50-foot radius of proposed pile driving shall be documented during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by pile driving, if any. Fixtures and finishes susceptible to damage and within a 50-foot radius of pile driving shall be documented (photographically and in writing) prior to demolition, grading, or building permit approval. All damage shall be repaired/restored to its preexisting condition.	Project Applicant Project Contractor	✓	✓		Community & Economic Development Department			

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NOI-4	Traffic and Stationary Source Noise Impacts. Prior to demolition, grading, or building permit approval, an Operational Noise Assessment shall be prepared for multi-family residential projects that would result in the following: • Existing Plus Project and Future Plus Project Traffic Noise Impacts: A permanent increase in ambient noise levels of 3.0 dB or greater and a noise level that would exceed the following applicable Riverside Municipal Code Title 7 interior/exterior noise standards at the noise sensitive receptor (or those in place at the time of the development application). • Stationary Noise Impacts: A noise level that would exceed the following applicable Riverside Municipal Code Title 7 interior/exterior noise standards at the noise sensitive receptor (or those in place at the time of the development application). Future development would be required to mitigate noise impacts for compliance with RMC Title 7 noise standards:	Noise Specialist	✓			Planning Division			

Land Use	RMC Title 7 Noise Standards	
	Interior	Exterior
Residential	35 dBA (10 PM to 7 AM) 45 dBA (7 AM to 10 PM)	45 dBA (10 PM to 7 AM) 55 dBA (7 AM to 10 PM)
Office/Commercial	N/A	65 dBA (any time)
Industrial	N/A	70 dBA (any time)
Community Support	N/A	60 dBA (any time)
Public Recreation Facility	N/A	65 dBA (any time)
Non-urban	N/A	70 dBA (any time)
School	45 dBA (7 AM to 10 PM while school is in session)	N/A
Hospital	45 dBA (any time)	N/A

Source: *City of Riverside Municipal Code Title 7, Noise Control.*

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Public Services and Recreation									
GP FPEIR MM REC-1	Future development shall provide developed parks or pay applicable Park Development Impact Fees to the City of Riverside Parks, Recreation, and Community Services Department prior to demolition, grading, or building permit approval.	Project Applicant	✓			Planning Division Parks, Recreation and Community Services Department			
GP FPEIR MM REC-2	The City shall re-evaluate Park Development Impact Fees on an annual basis to ensure that the fees collected from new development appropriately pay for the development of required park acreage.	Parks, Recreation and Community Services Department	Annually			Planning Division			
Transportation and Traffic									
TRA-1	Payment of Transportation Uniform Mitigation Fees (TUMF). To mitigate impacts to roadway levels of service and in accordance with RMC Chapter 16.68, *Transportation Uniform Mitigation Fee*, and specifically the provisions of RMC Section 16.68.060 concerning the procedures for the levy, collection, and disposition of fees, the project applicant shall pay the appropriate TUMF, to fund their proportionate fair share of the following roadway improvements: <u>Existing (2017) Plus Project Conditions</u> • #4 - Arlington Avenue (between Magnolia Avenue and SR-91 Southbound Ramps). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that exists along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route.	Project Applicant	✓			Public Works Department			

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MITIGATION MONITORING AND REPORTING PROGRAM									
Mitigation Measure No.	Mitigation Measure	Implementing Party	Phase / Timing			Responsible Party	Completed		Comments
			Pre-Con[1]	During Con	Post-Con		Initials	Date	
	• #28 - Van Buren Boulevard (between Rudicill Street and Mockingbird Canyon Road). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that is proposed along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route. • #29 - Van Buren Boulevard (between Mockingbird Canyon Road and Washington Street). Widened of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that is proposed along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route. • #30 - Van Buren Boulevard (between Washington Street and Wood Road). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). This improvement shall account for the bikeway that exists along this roadway segment, in accordance with the City of Riverside Bicycle Master Plan, as well as the existing transit route. • #33 - Van Buren Boulevard (between Limonite Avenue and Jurupa Avenue). Widening of this roadway from four to six lanes (two additional lanes, one in each direction). <u>Cumulative/Future (2040) Plus Project Conditions</u> • #28 - Van Buren Boulevard (between Rudicill Street and Mockingbird Canyon Road). See mitigation described above.								
TRA-2	Traffic Operations Assessment. Prior to grading and/or building permit approval, a Traffic Operations Assessment shall be required for future development that results in any one of the following: 1. Generates 100 or more new peak hour vehicle trips; 2. Does not conform with the City of Riverside's Access Management Guidelines; 3. The project site is located within 1,000 feet of a roadway or intersection where three or more reported vehicular accidents have occurred in a 12-month period, or five or more reported vehicular accidents in a 24-month period, and where the installation of traffic controls or improvements could reduce vehicular accidents; or ~~4.~~ The closest intersection, if greater than 1,000 feet from the project site, or segment of roadway between the project and the closest intersection, have had three or more reported vehicular accidents in a 12-month period, or five or more reported vehicular accidents in a 24-month period, and where the installation of traffic controls or improvements could reduce vehicular accidents.	Traffic Specialist/ Engineer	✓			Public Works Department			

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MITIGATION MONITORING AND REPORTING PROGRAM									
Mitigation Measure No.	Mitigation Measure	Implementing Party	Phase / Timing			Responsible Party	Completed		Comments
			Pre-Con[1]	During Con	Post-Con		Initials	Date	
TRA-3	Riverside County Congestion Management Program (CMP). Payment of Transportation Uniform Mitigation Fee (TUMF) shall be required prior to issuance of grading and/or building permits, which mitigates potentially significant traffic/circulation impacts to CMP facilities.	Project Applicant	✓			Public Works Department			
Utilities and Service Systems									
GP FPEIR MM UTL-2	In order to mitigate potential impacts to adequate wastewater treatment plant capacity, the City will review population and development trends with respect to capacity of the treatment plant in 2020 to assure growth is occurring as expected under the Typical Project development scenario which can be accommodated with the present plant and planned expansions. If the review finds that development is outpacing what would be expected under the typical level, then mitigation and funding mechanisms shall be implemented to address expected capacity deficiencies. Options for mitigation could include, but are not limited to, such approaches as outlined below: 1. Upgrade the 52.5 mgd wastewater treatment plant to accommodate excess growth, or 2. Construct a new 40 mgd wastewater treatment plant. This plant could be funded by new development (General Plan Policy PF-3.2), or 3. Develop an agreement with WMWD to take on additional wastewater generated within the City's service area.	Public Works Department	Annually			Planning Division			
GP FPEIR MM UTL-1	In order to mitigate potential impacts related to the need for expanded entitlements for water supply if population growth exceeds Typical Project level, the City will review population and development trends with respect to water sources and supply in 2015 and 2020 to assure that growth is occurring as expected under the Typical Project development scenario which can be accommodated with present and expected water sources. If the review finds that development is outpacing what would be expected under the typical level, then mitigation and funding mechanisms shall be implemented to address expected deficiencies. Options for mitigation could include, but are not limited to, such approaches as outlined below: 1. Acquire additional water from WMWD or other wholesale provider, or 2. Implement water conservation regulations to provide incentives and/or penalties to achieve necessary water conservation.	Public Works Department	Annually			Planning Division			
GP FPEIR MM UTL-4	The City will review the County Waste Management Annual Reports to California Integrated Waste Management Board (CIWMB) every five years to ensure that projections still show adequate capacity to and through the year 2025. If levels show that landfill capacity is becoming limited or exhausted, then the City shall increase efforts to divert waste from landfills such as meeting Policy PF 5.1 which	Public Works Department	Every Five Years			Planning Division			

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MITIGATION MONITORING AND REPORTING PROGRAM									
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			Pre-Con[1]	During Con	Post-Con		Initials	Date	
	encourages innovative methods and strategies to reduce the amount of waste materials entering landfills, including achieving 100 percent recycling citywide for both residential and non-residential development.								

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