



City of Arts & Innovation

## COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

### Draft Mitigated Negative Declaration

AGENDA ITEM NO.: 2

WARD: 2

1. **Case Number:** P17-0853 (General Plan Amendment) and P17-0854 (Rezoning)
2. **Project Title:** Entrada Housing Project
3. **Hearing Date:** September 6, 2018
4. **Lead Agency:** City of Riverside  
Community Development Department  
Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522
5. **Contact Person:** Matthew Taylor  
**Phone Number:** (951) 826-5944
6. **Project Location:** The project area is bounded by 7<sup>th</sup> Street on the south and Chicago Avenue on the east. APNs: 211-181-019, 211-181-020, 211-181-021, 211-181-022, 211-181-024, 211-181-025, 211-181-026.
7. **Project Applicant/Project Sponsor's Name and Address:** Wakeland Housing and Development Corp.  
1230 Columbia Street, Suite 950  
San Diego, CA 92101
8. **General Plan Designation:** Current: MDR – Medium-Density Residential and HDR – High-Density Residential  
Proposed: HDR – High-Density Residential
9. **Zoning:** Current: R-1-7000 – Single-Family Residential  
Proposed: R-3-1500 – Multi-Family Residential
10. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

Wakeland Housing and Development Corporation, in partnership with Riverside Housing Development Corporation is developing “Entrada,” a community of affordable rental housing units with on-site resident services. Located in the Riverside community of Chicago/Linden, a subset of the larger Eastside Neighborhood, Entrada will consist of approximately sixty-five (65) units, including one (1) unrestricted manager’s unit and 64 units affordable to very low-income households (households earning between 30 and 60 percent of the Area Median Income (AMI)). The units will be one-, two-, and three-bedrooms located in 11 two- and three-story buildings providing a combination of stacked flats and townhouses. The community will include a 2,500 square foot community center and a 900 square foot commercial space. Both the community center and the commercial space will be designed as amenities for residents, and will not be oriented to public use. The community center will include facilities for resident recreation, a common laundry room, as well as providing connections to services and events such as healthy cooking workshops. The total site area is 2.03 net acres (2.63 gross acres).

Access to the community will be provided from both Chicago Avenue and 7<sup>th</sup> Street. A total of 106 parking spaces will be provided on-site, 80 of which will be covered carports.

This project implements Phase One of the Chicago-Linden Strategic Plan by revitalizing the Chicago-Linden community through the relocation of overcrowded tenants living in substandard apartment buildings, demolition of those substandard buildings and new construction of an affordable rental community. The project area has been fully developed in the past. Some of the previously occurring buildings within the project area have already been demolished. All remaining existing structures will be removed prior to project implementation. The project area contained a total of 41 units, most of which have been removed. Those units still accommodating tenants will be relocated prior to project implementation. The project is to be built in one phase, and for purposes of this analysis is expected to be complete by early 2020.

To implement the proposed project, the applicant has requested a General Plan Amendment and Zone Change. The current General Plan Land Use designation of the project site is split between MDR – Medium Density Residential (1.19 net acres) and HDR – High-Density Residential (0.85 net acres), and the current Zoning designation of the entire site is R-1-7000 – Single-Family Residential. The applicant requests a General Plan Amendment to amend the site’s Land Use designation to HDR – High Density Residential and Rezoning to change the site’s Zoning designation to R-3-1500 – Multiple-Family Residential, allowing up to 29 units per gross acre. Under these designations, the site could accommodate up to 77 units. Multiple-family residences and associated amenities are permitted as a matter of right in the proposed R-3-1500 Zone, subject to the ministerial approval of Administrative Design Review. As such, detailed project-specific design documents will be reviewed ministerially prior to the issuance of building permits. To facilitate this analysis, illustrative conceptual plans have been provided as a supplement to the Project Description (Exhibits 3 and 4).

The applicant has also entered into an Affordable Housing Agreement, which pursuant to Riverside Municipal Code Chapter 19.545.080 (Density Bonus – Incentives, Concessions and In-Lieu Incentives) allows incentives, waivers or other concessions in development standards for the provision of affordable housing units. The project proponent is seeking reduced parking requirement as a Density Bonus concession in order to accommodate the 65 affordable rental units and supplemental amenities.

**11. Surrounding land uses and setting: Briefly describe the project’s surroundings:**

	<b>Existing Land Use</b>	<b>General Plan Designation</b>	<b>Zoning Designation</b>
<b>Project Site</b>	Single- and multi-family residential	Medium Density Residential (MDR); High Density residential (HDR)	R-1-7000 Single-Family Residential
<b>North</b>	Multi-family residential	High Density Residential (HDR)	R-3-1500 Multi-Family Residential
<b>East</b>	Commercial; light industrial (lumber, tire, auto body shop)	Business/Office Park (B/OP)	CR Commercial Retail; R-3-1500 Multi-Family Residential
<b>South</b>	Single-family residential	Medium Density Residential (MDR); High Density Residential (HDR)	R-1-7000 Single-Family Residential

<b>West</b>	Single- and multi-family residential	Medium Density Residential (MDR)	R-1-7000 Single-Family Residential
-------------	--------------------------------------	----------------------------------	------------------------------------

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

- a. City of Riverside Housing Authority
- b. Riverside County Airport Land Use Commission

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

- a. General Plan 2025
- b. GP 2025 FPEIR and Addenda
- c. Chicago-Linden Strategic Plan
- d. Chicago-Linden Strategic Plan Mitigated Negative Declaration

**14. List of Appendices**

- a. Appendix A – CalEEMod Output Tables
- b. Appendix B – Traffic Impact Analysis
- c. Appendix C – JMRC Memo
- d. Appendix D – Airport Land Use Commission Riverside County – Director’s Determination

**15. Acronyms**

AICUZ -	Air Installation Compatible Use Zone Study
AQMP -	Air Quality Management Plan
AUSD -	Alvord Unified School District
CEQA -	California Environmental Quality Act
CMP -	Congestion Management Plan
EIR -	Environmental Impact Report
EMWD -	Eastern Municipal Water District
EOP -	Emergency Operations Plan
FEMA -	Federal Emergency Management Agency
FPEIR -	GP 2025 Final Programmatic Environmental Impact Report
GIS -	Geographic Information System
GhG -	Green House Gas
GP 2025 -	General Plan 2025
IS -	Initial Study
LHMP -	Local Hazard Mitigation Plan
MARB/MIP -	March Air Reserve Base/March Inland Port
MJPA-JLUS -	March Joint Powers Authority - Joint Land Use Study
MSHCP -	Multiple-Species Habitat Conservation Plan
MVUSD -	Moreno Valley Unified School District
NCCP -	Natural Communities Conservation Plan
OEM -	Office of Emergency Services
OPR -	Office of Planning & Research, State
PEIR -	Program Environmental Impact Report
PW -	Public Works, Riverside
RCALUC -	Riverside County Airport Land Use Commission
RCALUCP -	Riverside County Airport Land Use Compatibility Plan

RCP -	Regional Comprehensive Plan
RCTC -	Riverside County Transportation Commission
RMC -	Riverside Municipal Code
RPD -	Riverside Police Department
RPU -	Riverside Public Utilities
RTIP -	Regional Transportation Improvement Plan
RTP -	Regional Transportation Plan
RUSD -	Riverside Unified School District
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SCH -	State Clearinghouse
SKR-HCP -	Stephens' Kangaroo Rat - Habitat Conservation Plan
SWPPP -	Storm Water Pollution Prevention Plan
USGS -	United States Geologic Survey
WMWD -	Western Municipal Water District
WQMP -	Water Quality Management Plan

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Aesthetics               | <input type="checkbox"/> Agriculture & Forest Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources     | <input type="checkbox"/> Cultural Resources             | <input type="checkbox"/> Geology/Soils                      |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials  | <input type="checkbox"/> Hydrology/Water Quality            |
| <input type="checkbox"/> Land Use/Planning        | <input type="checkbox"/> Mineral Resources              | <input type="checkbox"/> Noise                              |
| <input type="checkbox"/> Population/Housing       | <input type="checkbox"/> Public Service                 | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Transportation/Traffic   | <input type="checkbox"/> Utilities/Service Systems      | <input type="checkbox"/> Mandatory Findings of Significance |

**DETERMINATION:** (To be completed by the Lead Agency)

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

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

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

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

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

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

Signature \_\_\_\_\_

Date \_\_\_\_\_

Printed Name & Title \_\_\_\_\_

For \_\_\_\_\_ City of Riverside



City of Arts & Innovation

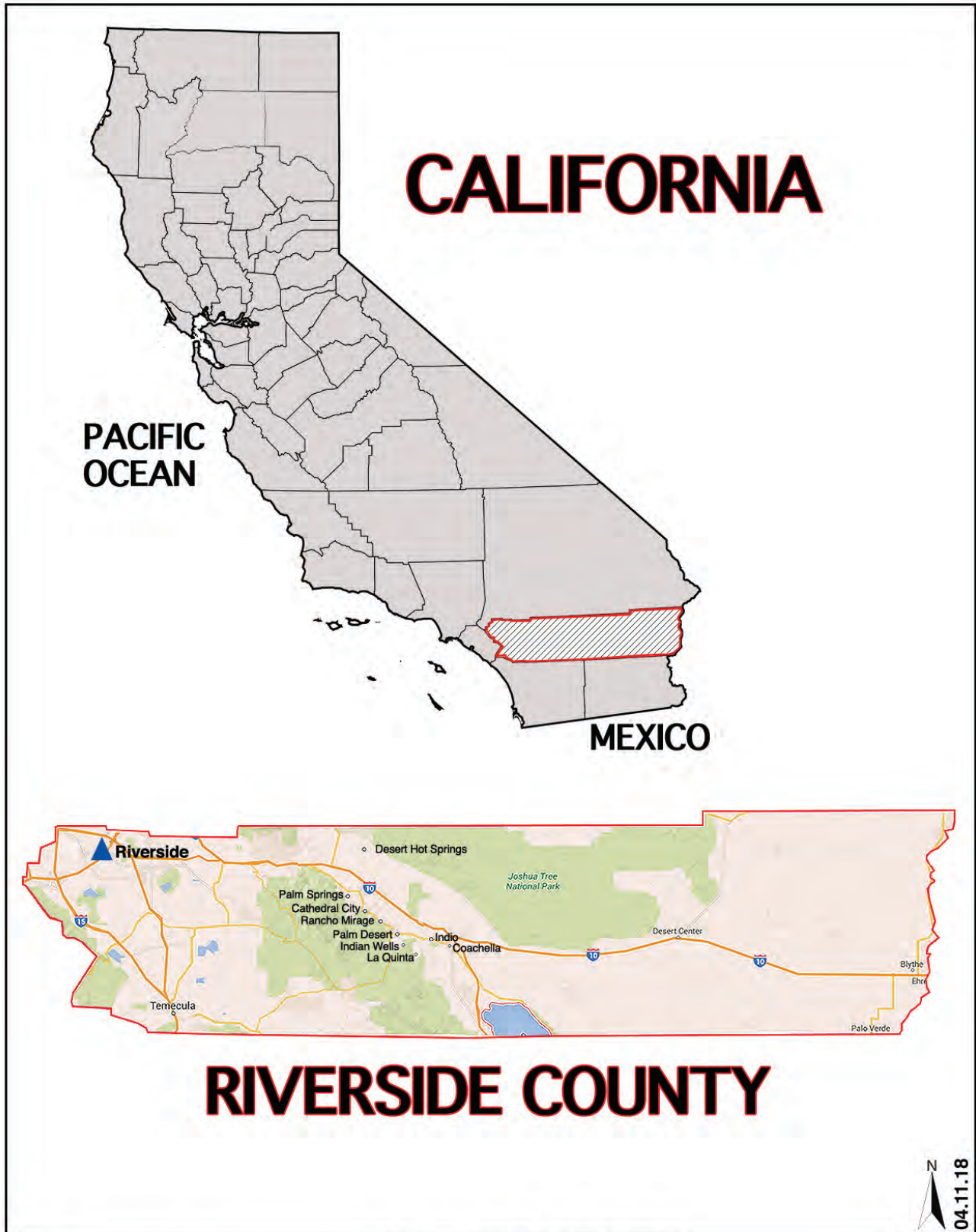
## C. COMMUNITY DEVELOPMENT DEPARTMENT Planning Division

### Environmental Initial Study

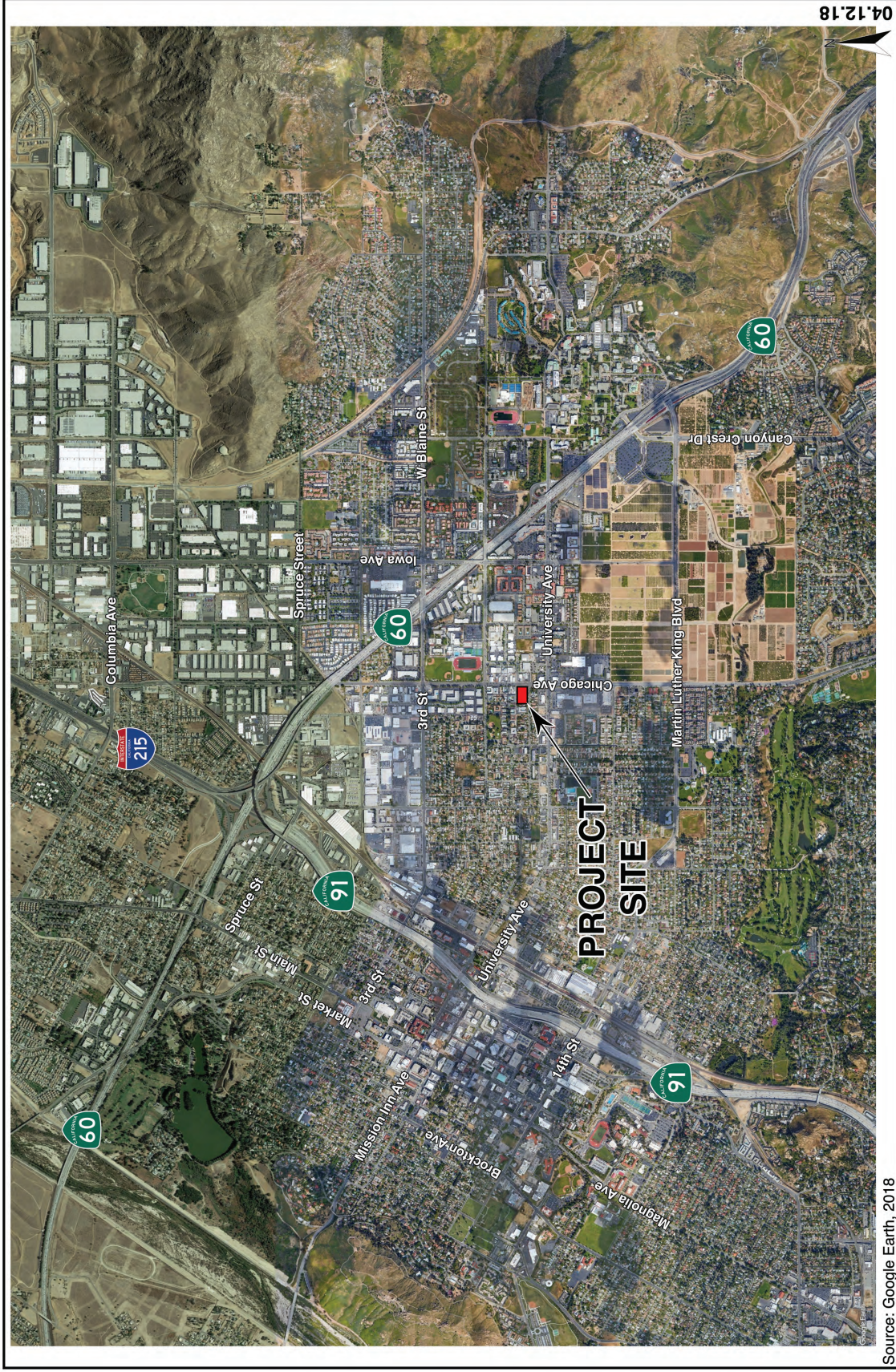
#### EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. **Earlier Analysis Used.** Identify and state where they are available for review.
  - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

- 8) The explanation of each issue should identify:
- a. the significance criteria or threshold, if any, used to evaluate each question; and
  - b. the mitigation measure identified, if any, to reduce the impact to less than significance.







Source: Google Earth, 2018

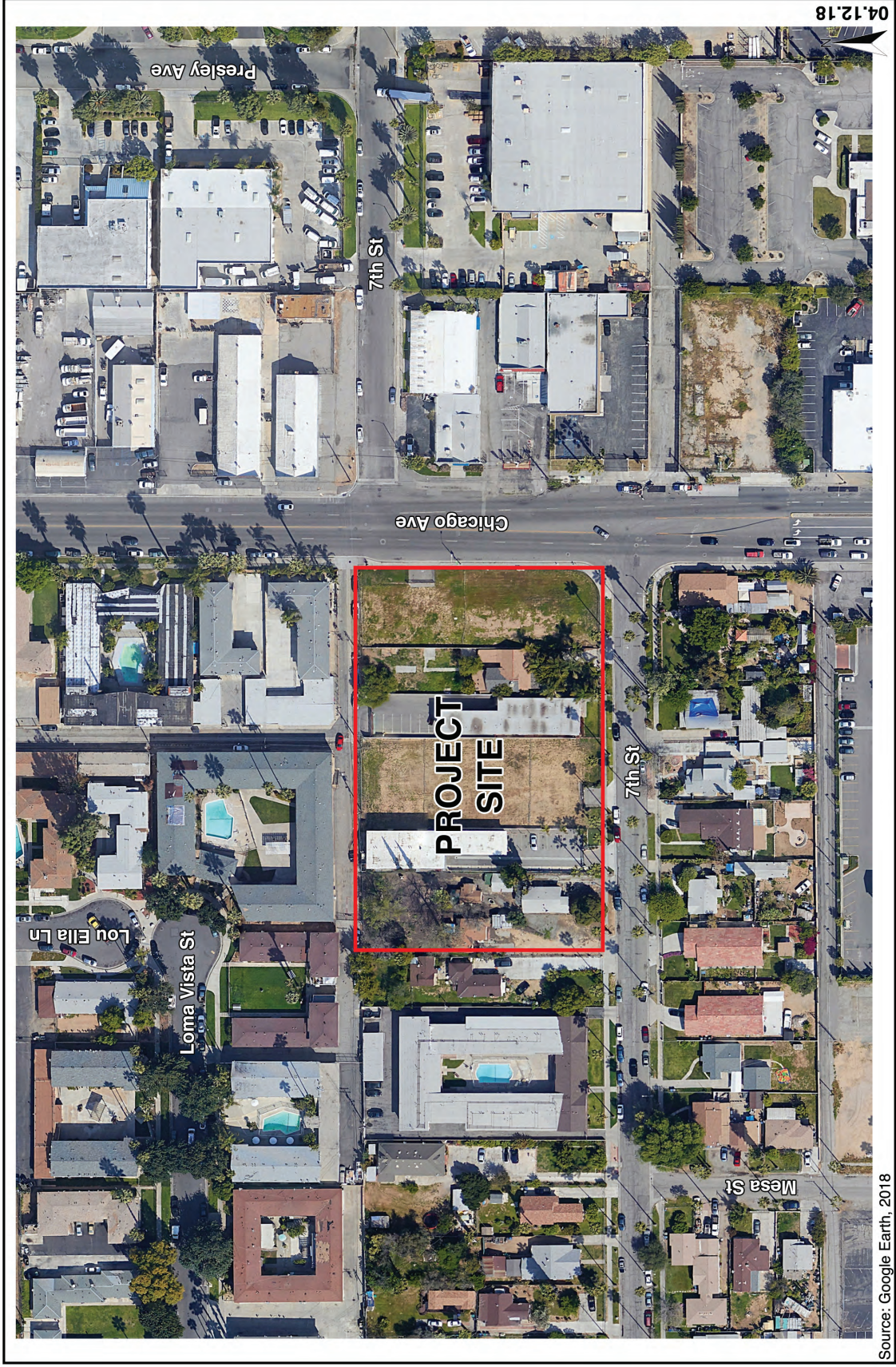


**Entrada Housing Development  
Vicinity Map  
Riverside, California**

Exhibit

**2**





Source: Google Earth, 2018

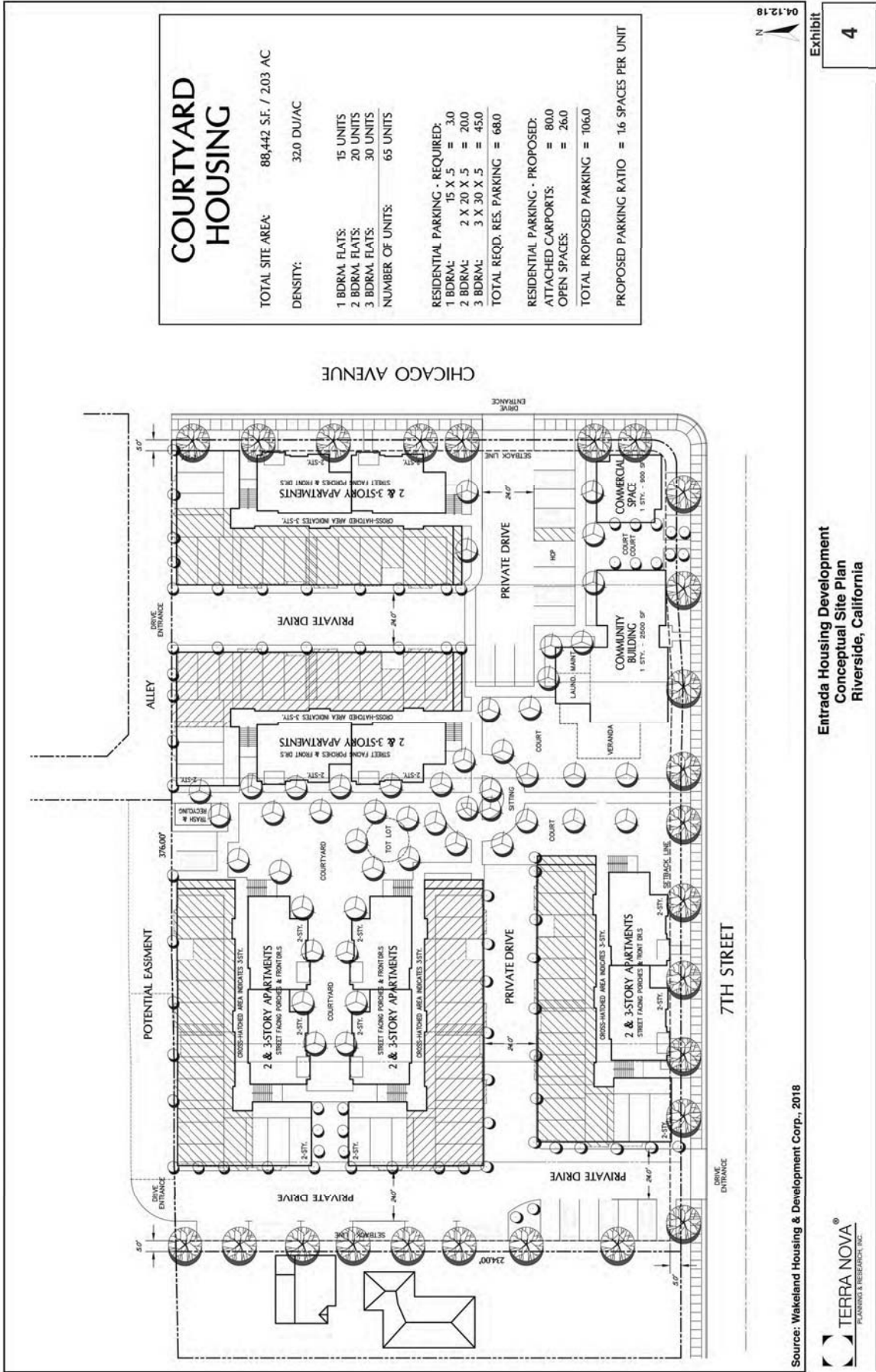


Entrada Housing Development  
Project Location Map  
Riverside, California

Exhibit

3





<b>COURTYARD HOUSING</b>	
TOTAL SITE AREA:	88,442 SF / 2.03 AC
DENSITY:	32.0 DU/AC
1 BDRM FLATS:	15 UNITS
2 BDRM FLATS:	20 UNITS
3 BDRM FLATS:	30 UNITS
NUMBER OF UNITS:	65 UNITS
RESIDENTIAL PARKING - REQUIRED:	
1 BDRM:	15 X 5 = 3.0
2 BDRM:	2 X 20 X 5 = 20.0
3 BDRM:	3 X 30 X 5 = 45.0
TOTAL REQD. RES. PARKING	= 68.0
RESIDENTIAL PARKING - PROPOSED:	
ATTACHED CARPORTS:	= 80.0
OPEN SPACES:	= 26.0
TOTAL PROPOSED PARKING	= 106.0
PROPOSED PARKING RATIO	= 16 SPACES PER UNIT

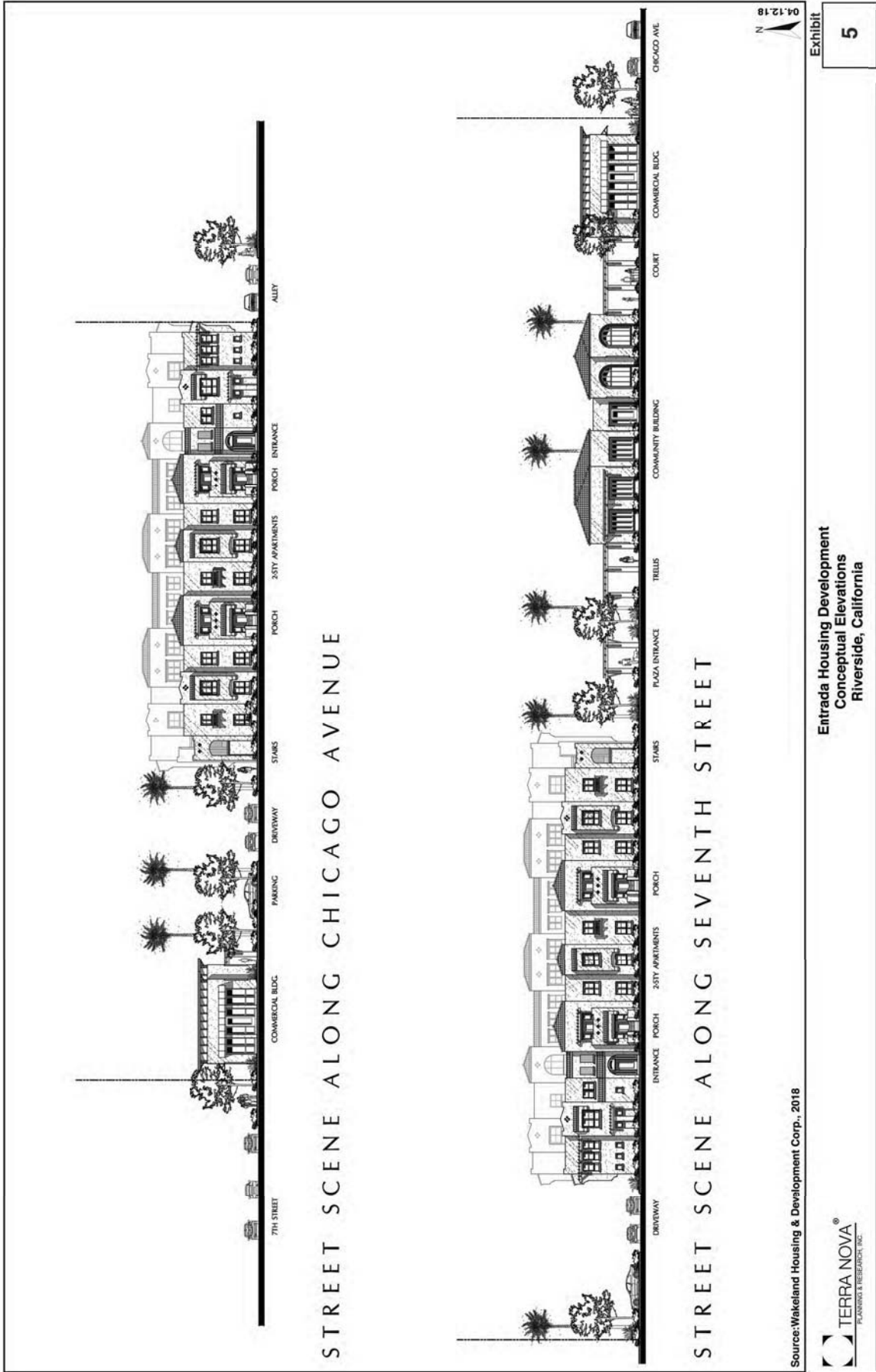
Source: Wakeland Housing & Development Corp., 2018



Entrada Housing Development  
Conceptual Site Plan  
Riverside, California

Exhibit

4



ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1. AESTHETICS.</b> Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>1a. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways, Chicago-Linden Strategic Plan)  <b>Less Than Significant Impact.</b> The project site is located in a fully urbanized area, and is surrounded on all sides by existing development, including an alley and multi-family units on the north; Chicago Avenue and a mix of commercial and industrial uses on the east; 7 <sup>th</sup> Street and single-family units on the south; and multi-family units on the west. The project proposes one-, two- and three-story buildings on the site. Single story buildings will include amenities for the residents, including the community center and commercial space, both located closest to the corner of Chicago Avenue and 7 <sup>th</sup> Street. Two- and three-story elements of the project will occur in the center of the site, along Chicago Avenue and toward the alley. This layout will assure that impacts of larger structures on 7 <sup>th</sup> Street are relieved, particularly for the single-family residences to the south. The urban environment in which the project is located limits views of scenic vistas currently. From Chicago Avenue, views of the hills to the east are blocked by existing commercial development, although hilltops can be seen above these buildings. The project, being located to the west, will not impact these views. From 7 <sup>th</sup> Street, views are extremely limited because of the narrowness of the street, and the density of existing development. Views from the front yards of the homes on the south side of 7 <sup>th</sup> Street will not substantially change; insofar as existing buildings currently block long-range views to the north. Views from the alley on the north side of the site to the south will be substantially the same as currently experienced, because of the existing and previously occurring two story multi-family structures on the site.  Overall, impacts associated with scenic vistas will be less than significant and will be substantially similar to those currently occurring on and around the subject property.				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>1b. Response:</b> (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways)  <b>No Impact.</b> The proposed project is not located on or in the vicinity of a scenic highway, or a scenic boulevard, parkway or special boulevard as designated by the City’s General Plan 2025. There are no rock outcroppings or historic buildings within proximity of the proposed project. A potentially locally significant historic residence was previously identified at 1823 7 <sup>th</sup> Street <sup>1</sup> . This property is located approximately 400 feet west of the project site and will not be impacted by the proposed project. The proposed project will have no impact on scenic resources.				

<sup>1</sup> “Cultural Resources Survey Chicago-Linden Strategic Plan” JMRC, July 2013.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>1c. Response: (Source: General Plan 2025)</b></p> <p><b>No Impact.</b> The proposed project consists of an infill project within an urbanized area completely surrounded by existing development. The architecture of the townhomes, community center, and commercial building will be consistent and compatible with the style currently occurring in the neighborhood, will be designed to meet the development standards of the adopted Chicago-Linden Strategic Plan. The project will enhance the visual character of the area by replacing vacant lots and buildings with new construction designed in a manner consistent with the Citywide Design Guidelines for new residential development. Therefore, it will not degrade the existing visual character of the area and no impact directly, indirectly or cumulatively to the visual character or quality of the neighborhood will occur.</p>				
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>1d. Response: (Source: General Plan 2025, General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines)</b></p> <p><b>Less Than Significant Impact.</b> The project would not result in a new source of substantial light or glare which would adversely affect day or nighttime views as the project. The site is not within the Mount Palomar Lighting Area. New sources of light will consist of one-, two- and three-story townhouses and will include landscaping lighting, security lighting, and parking lot lights from stationary sources, as well as lights from headlights accessing the site. The project area is urbanized and contains existing sources of light and glare from existing residential dwellings, streetlights, and vehicular headlights. Buildout of the proposed project would result in a residential complex, which will add new sources of light. However, new buildings will be consistent in design with existing development, and no highly reflective exterior or roofing materials that constitute significant sources of localized glare are anticipated. Street lights will be consistent with the City’s Roadway Lighting systems.</p> <p>The proposed project will be required to submit an exterior lighting plan and must comply with General Plan 2025 FPEIR mitigation measure AES 3, which stipulates the following: “To further reduce impacts related to light pollution, the City shall require at the time of issuing of building permits all developments that introduce light sources, or modifications to existing light sources, to have shielding devices or other light pollution limiting characteristics such as hoods or lumen restrictions.” The City also requires that new projects submit photometric studies and lighting specifications for Design Review. These plans must conform to City standards and must be approved prior to construction of the project. Adherence to the measure and conformance with the City’s standard requirements will ensure that light sources occurring on the project site will not significantly impact the lighting environment in the area.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>2. AGRICULTURE AND FOREST RESOURCES:</b>				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>2a. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability)</b>  <b>No Impact.</b> The Project is located within an urbanized area. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 reveals that the project site is not designated as and is not adjacent to or in proximity to any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the project will have no impact directly, indirectly or cumulatively to agricultural uses.				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves))</b>  <b>No Impact.</b> A review of Figure OS-3 – Williamson Act Preserves of the General Plan 2025 shows that the site is not designated or adjacent to any lands classified as Williamson Act Preserve and Contracted Land or Williamson Act Preserve. Furthermore, the project site is within a built environment. No Williamson Act contracts are implemented on the site. The proposed project will not conflict with existing zoning for agricultural uses or any applicable Williamson Act contracts. Therefore, no impacts will occur from this project directly, indirectly or cumulatively.				
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>2c. Response: (Source: General Plan 2025 – Zoning Map of the City of Riverside)</b>  <b>No Impact.</b> The City of Riverside has no forest land nor does it have any timberland. Further, the subject site is zoned as R-1-7000 Single-Family Residential and does not contain forest land. Therefore, no impacts will occur from this project directly, indirectly or cumulatively.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2d. Response:</b></p> <p><b>No Impact.</b> Although the City of Riverside is known as a “City of Trees”, the City’s Urban Forest Tree Policy Manual provides guidelines for the preservation and protection of the city’s tree heritage. Further, as stated above, the City of Riverside has no forest land that can support 10-percent native tree cover nor does it have any timberland, therefore no impacts will occur from this project directly, indirectly or cumulatively.</p>				
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2e. Response: (Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, Zoning Map of the City of Riverside)</b></p> <p><b>No Impact.</b> The project is located in an urbanized area of the City in an existing neighborhood. Additionally, the site is identified as urban/built out land and therefore does not support agricultural resources or operations. The project will not result in the conversion of designated farmland to non-agricultural uses. There are no agricultural resources or operations, including farmlands within proximity of the subject site. The City of Riverside has no forest land that can support 10-percent native tree cover. There will be no impact associated with agricultural or forestry conversion.</p>				



<b>3. AIR QUALITY.</b>				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
<b>a.</b> Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>3a. Response: (Source: South Coast Air Quality Management District's 2007 Air Quality Management Plan (AQMP))</b>  <p><b>Less Than Significant Impact.</b> The proposed project is consistent with the General Plan 2025 Program "Typical Growth Scenario". The Air Quality Management Plan (AQMP) for the South Coast Air Basin (SCAB) sets forth a comprehensive program that will lead the SCAB into compliance with all Federal and State air quality standards. The City of Riverside is located within the Riverside County sub region of the SCAG projections. The General Plan 2025 FPEIR determined that implementation of the General Plan 2025 would generally meet attainment forecasts and attainment of the standards of the AQMP.</p> <p>Furthermore, the approved Chicago-Linden Strategic Plan, and, as a direct result, the proposed project, fosters the revitalization of the Chicago-Linden neighborhood including the proposed project. Given that the proposed project is part of the initiatives set forth in the Strategic Plan it is consistent with the General Plan 2025 policies to promote mixed use, pedestrian-friendly communities that serve to reduce air pollutant emissions over time. This project is consistent with these policies.</p> <p>Thus, the proposed project will have no impact directly, indirectly or cumulatively to the implementation of an air quality plan.</p>				
<b>b.</b> Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>3b. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 AQMP, CalEEMod)</b>  <p><b>Less Than Significant Impact.</b> The implementation of the proposed project would result in the construction of a multi-family residential complex, a commercial building, and a community building. The analysis provided below represents the full build out of the entire project. For analysis purposes, it is assumed that the construction period would be nine months, beginning in mid-2019. The project proponent estimates that the proposed project's construction phase would take place in 2019 and extend to early 2020. The construction and operation of the proposed project will result in the release of criteria air pollutants. The California Emissions Estimator Model (CalEEMod) Version 2016.1.3 was used to determine air quality emissions that will be generated by construction and operation of the proposed project. Table 1 summarizes the short-term construction-related emissions, and Table 2 summarizes the ongoing emissions that will be generated at operation.</p> <p><u>Construction Emissions</u></p> <p>The construction period includes demolition, site preparation, grading, building construction, paving, and architectural coating associated with the proposed project. For analysis purposes, it is assumed that construction will occur over a nine-month period.</p> <p>As depicted in Table 1, emissions generated by construction activities will not exceed SCAQMD thresholds of significance for criteria air pollutants. The data reflect average daily emissions over a nine-month construction period, including both summer and winter weather conditions. It should be noted that the table shows projected mitigated emissions. Implementation of standard requirements including, but not limited to, the implementation of dust control practices in conformance with SCAQMD Rule 403 were included in the assumptions to calculate potential emissions. According to the CalEEMod analysis outputs, impacts to air quality from construction of the proposed project are expected to be less than significant since the levels are below the SCAQMD thresholds.</p>				

**Table 1**  
**Construction Emissions for the Entrada Housing Development**  
**(lbs per day)**

	CO	NOx	ROG	SOx	PM10	PM2.5
2018	19.18	24.42	23.07	0.04	7.52	4.44
<b>SCAQMD Threshold</b>	<b>550.00</b>	<b>100.00</b>	<b>75.00</b>	<b>150.00</b>	<b>150.00</b>	<b>55.00</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod Version 2016.3.1. CalEEMod output tables generated 4.23.18. Value shown represents the average emissions from summer and winter, unmitigated. See Appendix A.

#### Operational Emissions

Operational emissions are ongoing emissions that will occur over the life of the project. Operational emissions include area source emissions, emissions from energy (electric and natural gas) demand, and mobile source (vehicles) emissions. As shown in the table below, operational emissions will not exceed SCAQMD thresholds of significance for any criteria pollutants. Impacts will be less than significant.

**Table 2**  
**Construction Emissions for the Entrada Housing Development**  
**(lbs per day)**

	CO	NOx	ROG	SOx	PM10	PM2.5
Operation Emissions	21.03	6.49	2.93	0.05	3.89	1.11
<b>SCAQMD Threshold</b>	<b>550.00</b>	<b>100.00</b>	<b>75.00</b>	<b>150.00</b>	<b>150.00</b>	<b>55.00</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod Version 2016.3.1. CalEEMod output tables generated 4.23.18. Value shown represents the average emissions from summer and winter, unmitigated. See Appendix A.

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

☐
☐
☒
☐

**3c. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 Air Quality Management Plan, CalEEMod 2016 Model)**

**Less than Significant Impact.** The portion of the Basin within which the City is located is designated as a non-attainment area for ozone, PM-10 and PM-2.5 under State standards, and as a non-attainment area for ozone, carbon monoxide, PM-10, and PM-2.5 under Federal standards. Per the GP 2025 FPEIR, AQMP thresholds indicate future construction activities under the General Plan are projected to result in significant levels of NOx and ROG, both ozone precursors, PM-10, PM-2.5 and CO. Although long-term emissions are expected to decrease by 2025, all criteria pollutants remain above the SCAQMD thresholds.

Since the proposed project is consistent with the approved Chicago-Linden Strategic Plan, and the project will not exceed thresholds established by SCAQMD, cumulative impacts related to criteria pollutants as a result of the project are expected to be less than significant. Further, the proposed project does not result in any new significant impacts that were not previously evaluated and for which a statement of overriding considerations was adopted as part of the General Plan 2025 FPEIR. Therefore, cumulative air quality emissions impacts are less than significant.

d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>																														
<p><b>3d. Response:</b> <i>(Source: South Coast Air Quality Management District's Mass Rate Look-Up Table, CalEEMod)</i></p> <p><b>Less Than Significant Impact.</b> Short-term impacts associated with construction will result in increased air emissions from grading, earthmoving, and construction activities. Mitigation Measures of the General Plan 2025 FPEIR require individual development to employ construction approaches that minimize pollutant emissions (General Plan 2025 FPEIR MM AIR 1-MM AIR 5, e.g., watering for dust control, tuning equipment, limiting truck idling times).</p> <p style="text-align: center;"><b>Table 3</b> <b>Localized Significance Thresholds for the Entrada Housing Development</b> <b>(lbs/day)</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>CO</th> <th>NOx</th> <th>PM10</th> <th>PM2.5</th> </tr> </thead> <tbody> <tr> <td>Construction<sup>1</sup></td> <td>19.18</td> <td>24.42</td> <td>7.52</td> <td>4.44</td> </tr> <tr> <td><b>LST Construction</b></td> <td><b>2,292</b></td> <td><b>304</b></td> <td><b>14</b></td> <td><b>8</b></td> </tr> <tr> <td>Operational<sup>2</sup></td> <td>21.03</td> <td>6.49</td> <td>3.89</td> <td>1.11</td> </tr> <tr> <td><b>LST Operation</b></td> <td><b>2,292</b></td> <td><b>304</b></td> <td><b>4</b></td> <td><b>2</b></td> </tr> <tr> <td><b>Exceed?</b></td> <td><b>No</b></td> <td><b>No</b></td> <td><b>No</b></td> <td><b>No</b></td> </tr> </tbody> </table> <p>Source: CalEEMod Version 2016.3.1. CalEEMod output tables generated 4.23.18; Mass Rate Look-up Table, SCAQMD Area Source Receptor 23 (Metropolitan Riverside County) for a 5-acre project, sensitive receptor at 25 meters.</p> <p><sup>1</sup> Maximum unmitigated construction emissions</p> <p><sup>2</sup> Maximum unmitigated operational emissions</p> <p>The nearest sensitive receptors are residential developments immediately surrounding the project site's north and west boundaries. During construction, localized exposure of sensitive receptors to pollutant concentrations would range from weeks to months depending on the construction phase and proximity of emissions sources. Construction equipment will not be constantly in close proximity to any one sensitive receptor throughout the duration of construction activities. Maximum localized emissions were quantified for each construction activity and are shown above in Table 3. Furthermore, the proposed project will not require a CO hotspot analysis given that it meets other project level conformity requirements by being in compliance with the SCAQMD significance criteria as shown in Table 3.</p> <p>Project construction and operational emissions were analyzed using the CalEEMod model, which determined that project emissions would not exceed the SCAQMD thresholds for construction and operation thresholds. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and a less than significant impact would occur.</p>						CO	NOx	PM10	PM2.5	Construction <sup>1</sup>	19.18	24.42	7.52	4.44	<b>LST Construction</b>	<b>2,292</b>	<b>304</b>	<b>14</b>	<b>8</b>	Operational <sup>2</sup>	21.03	6.49	3.89	1.11	<b>LST Operation</b>	<b>2,292</b>	<b>304</b>	<b>4</b>	<b>2</b>	<b>Exceed?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
	CO	NOx	PM10	PM2.5																														
Construction <sup>1</sup>	19.18	24.42	7.52	4.44																														
<b>LST Construction</b>	<b>2,292</b>	<b>304</b>	<b>14</b>	<b>8</b>																														
Operational <sup>2</sup>	21.03	6.49	3.89	1.11																														
<b>LST Operation</b>	<b>2,292</b>	<b>304</b>	<b>4</b>	<b>2</b>																														
<b>Exceed?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>																														
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>																														
<p><b>3e. Response:</b> <i>(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 Air Quality Management Plan, CalEEMod 2016 Model)</i></p> <p><b>Less Than Significant Impact.</b> The operation of a residential complex is not typically associated with the generation of objectionable odors. The construction activities associated with the expected build out of the project site will generate airborne odors like diesel exhaust emissions, and architectural coating applications. However, these emissions would occur only during daylight hours, be short-term in duration, and would be isolated to the immediate vicinity of the construction site. Therefore, they would not expose a substantial number of people to objectionable odors on a permanent basis.</p> <p>The proposed use may potentially expose people to odors associated with cooking and housekeeping within the residential component of the project. Depending on the use that occurs within the commercial building proposed on the project site, some odors may be generated by that use. Neither land use, however, has the potential to generate significant objectionable odors that would affect substantial numbers of people. Impacts associated with objectionable odors are expected to be less than significant.</p>																																		

<b>4. BIOLOGICAL RESOURCES.</b> Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>4a. Response:</b> <i>(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area)</i></p> <p><b>No Impact.</b> The project site is located on a previously developed/improved site within an urbanized area surrounded by development on all sides. Common species typical of the urban environment occur on and around the project, based on the existence of ornamental landscaping within the area. The project site and its vicinity are not located in or near a Western Riverside MSHCP criteria cell or conservation area. The project will have no impact directly, indirectly and cumulatively on habitat modifications, species identified as a candidate, sensitive, or special status species in local or regional plans, and policies or regulations of the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>4b. Response:</b> <i>(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)</i></p> <p><b>No Impact.</b> As stated above, the project is located on a previously developed site within an urbanized area where no riparian habitat or other sensitive natural community exists on site or within proximity to the project site. The project site is not located within any MSHCP Narrow Endemic Plant Species Survey Areas (NEPSSA). The soils and conditions present at the project site are not suitable for sensitive species. Moreover, no narrow endemic or sensitive plant species, vernal pools, or riparian habitat. Therefore, no impact to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service will occur directly, indirectly, and cumulatively.</p>				
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>4c. Response:</b> <i>(Source: City of Riverside GIS/CADME USGS Quad Map Layer)</i></p> <p><b>No Impact.</b> The project is located within an urbanized area where no federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.), exist on site or within proximity to the project site. The project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and thus does not include United States Army Corps of Engineers (USACE) jurisdictional drainages or wetlands. Therefore, the proposed project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act directly, indirectly and cumulatively.</p>				

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>4d. Response: (Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage)</b>  <b>No Impact.</b> The subject area is located within an urban neighborhood, which is comprised of buildings and is not within a MSHCP linkage area. The site has been developed for a number of years and contains no native habitat, such that the project cannot interfere 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. For this reason, the proposed project will have no impacts to wildlife movement.				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>4e. Response: (Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual)</b>  <b>No Impact.</b> The proposed project is subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, any project within the City of Riverside’s boundaries that proposes planting a street tree within a City right-of-way must follow the Urban Forest Tree Policy Manual. The Manual documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. No impact is anticipated.				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens’ Kangaroo Rat Habitat Conservation Plan, Lake Mathews Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan)</b>  <b>No Impact.</b> The greater Chicago-Linden neighborhood, including the project site, is an urbanized area and does not contain any designated conservation lands. The project is within the boundary of the Western Riverside MSHCP, and will be responsible for the payment of fees, if applicable. However, the project is not within or in the vicinity of a conservation area, as defined by the Plan, due to its urbanized character. The neighborhood is not identified as being within, and therefore will not impact, an adopted Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan directly, indirectly and cumulatively. Therefore, the proposed project will have no impact on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.				

<b>5. CULTURAL RESOURCES.</b> Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>5a. Response:</b> <i>(Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code; Appendix C: Entrada Project Cultural Resources Survey Update for the Entrada Project, Chicago/Linden Strategic Plan prepared by JM Research and Consulting)</i></p> <p><b>Less Than Significant Impact.</b> The project site is located in a neighborhood that has existed for many years. The project is not located within a designated historic district or neighborhood, and no cultural resources have been recorded within the site boundaries. The project site is within the Chicago Linden Strategic Plan, for which JM Research and Consulting (JMRC) prepared a Cultural Resources Survey in 2013. JMRC identified seventy-five properties on seventy-seven parcels within approximately 44 acres bounded by Linden Street to the north, Chicago Avenue to the east, Seventh Street to the south and Dwight Avenue to the west. The Survey concluded that the project area, the Chicago/Linden neighborhood, is located within the Eastside Neighborhood. Development with the project area was largely attributed to early-20<sup>th</sup> century single-family and mid-20<sup>th</sup> century multi-family residential development. Several properties had been previously surveyed, yet none had been designated or found to be eligible for designation.</p> <p>The records search identified 43 cultural resources within a one-mile radius of the project site. These resources are historic built environments consisting of individual buildings, as well as a historic district and a railroad segment. None of these historic resources occurred within the project site.</p> <p>Only six properties were identified as potentially eligible for local individual designation. The following six properties: The Ekins Residence at 3509 Ottawa Avenue (1894); Pember-Herrick Grove Palm Row (ca. 1890s); Pacific Ready-Cut Kit House Style No. 385 at 1823 Seventh Street (1926); Apartment house at 1855-61 Loma Vista Street (1956); Palma Vista Apartments at 1783-97 Loma Vista Street (1957-8); and the Courtyard apartments at 1806 Loma Vista Street (1959) were identified as potentially eligible for local individual designation based on their historic or architectural distinction and were given a CHR Status Code of “5S3 – Appears to be individually eligible for local listing or designation through survey evaluation.” These identified properties are not located within or adjacent to the project area.</p> <p>The only one of these properties occurring in the vicinity of the project site is located at 1823 7<sup>th</sup> Street, about 400 feet west of the proposed project. The proposed project does not propose any physical demolition, destruction, relocation, or alteration of this site, nor will it impact any of the other identified resources within the neighborhood</p> <p>In May 2018, JMRC prepared a focused update of the 2013 survey for the currently proposed project area. This update reviewed the 2013 survey efforts and included a record search, field survey and digital photographs of the project area in order to identify changes to properties since the 2013 survey. The update identified changes to the properties, including demolition of buildings at 1705, 1719, and 1733 Seventh Street, and that the remaining buildings are currently vacant. The conclusions made in the 2013 survey remain in effect, no historic properties are located within the project site, and the proposed development of the subject site is consistent to that proposed by the Strategic Plan.</p> <p>The proposed project will be consistent with the Strategic Plan, which includes design guidelines pertaining to facades, lighting, fencing and other features to be sensitive to the neighborhood character in which it occurs. For this reason, the construction and subsequent operation of the proposed project will not significantly impact historic or potential historic structures. There will be a less than significant impact on historical resources as defined in Section 15064.5 of the CEQA Guidelines.</p>				

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>5b. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Cultural Resources Report for the Chicago/Linden Strategic Plan prepared by JM Research and Consulting ; Appendix C: Entrada Project Cultural Resources Survey Update for the Entrada Project, Chicago/Linden Strategic Plan prepared by JM Research and Consulting)</b>				
<p><b>Less Than Significant Impact.</b> All of the project area has been previously developed and disturbed numerous times in association with construction of homes, roads, and park facilities. The project site itself has been developed for a number of years, including two story structures that would have required over-excavation, and property-wide grading for parking areas and structures. A Sacred Lands Files search conducted by the Native American Heritage Commission in 2012, failed to indicate the presence of any Native American traditional cultural places or landscapes in the Strategic Plan project area. 15 Native American Tribes that have tribal cultural affiliations in the project area were contacted for consultation on the proposed project by BCR Consulting at the time the Strategic Plan was prepared. The Survey update conducted for the proposed project in 2018 included a new records search, which identified resources which are all historic in nature. In accordance with state law, the City sent out SB 18 and AB 52 consultation letters to the appropriate tribal authorities in order to invite them to consult on the proposed project. As of August 2018, comments have been received and consultation has been conducted with the Soboba Band of Luiseño Indians, Viejas Band of Kumeyaay Indians, and Morongo Band of Mission Indians. No known archaeological resources were identified, and none are known to occur within the project area. Consulting tribes identified no specific concerns relating to potential impacts to Tribal cultural resources, which are not known to exist on the project site, and only standard conditions relating to the treatment and disposition of inadvertent discoveries were requested.</p> <p>There will therefore be no direct, indirect or cumulative impact on archeological resources as a result of implementation of the proposed project.</p>				
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>5c. Response: (Source: General Plan 2025 Policy HP-1.3, Cultural Resources Report for the Chicago/Linden Specific Plan prepared by JM Research and Consulting ; Appendix C: Entrada Project Cultural Resources Survey Update for the Entrada Project, Chicago/Linden Strategic Plan prepared by JM Research and Consulting )</b>				
<p><b>No Impact.</b> The project is located on a previously developed/improved site within an urbanized area where no paleontological resources or unique geologic features have been identified. The General Plan reports that areas south of Mockingbird Canyon Reservoir, located approximately seven miles southwest of the project site, are the only areas in the General Plan planning area that are considered to have paleontological resources or unique geologic features. Further, the cultural resources survey that was conducted for the Strategic Plan area, including the project site, did not indicate that there was a presence of paleontological features or resources in the project area. The 2018 update to the 2013 survey found no new findings or discoveries related to paleontological resources. The project will have no impact directly or indirectly to a unique paleontological resource or site or unique geologic feature.</p>				
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>5d. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity Cultural Resources Report for the Chicago/Linden Strategic Plan prepared by JM Research and Consulting ; Appendix C: Entrada Project Cultural Resources Survey Update for the Entrada Project, Chicago/Linden Strategic Plan prepared by JM Research and Consulting)</b>				
<p><b>No Impact.</b> The project is located on a previously developed site within an urbanized area that has been covered with impervious surfaces and buildings for a number of years. No known burial sites or cemeteries occur in the vicinity of the project site. Even so, in the event human remains are discovered during construction of the proposed project the project contractor would be subject to state law regarding the discovery and disturbance of human remains, which requires the project contractor to immediately notify law enforcement and allow the coroner to determine the nature of the remains (historic or prehistoric, human or not). The coroner is also responsible for the proper removal and potential re-burial of the remains, and consultation with Tribal officials if the remains are determined to be Native American. As a result of these State requirements, impacts to human remains are expected to be less than significant. For this reason, the project will have</p>				

less than significant impacts directly, indirectly or cumulatively on any human remains, including those interred outside of formal cemeteries.

<b>6. GEOLOGY AND SOILS.</b> Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>6i. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones &amp; General Plan 2025 FPEIR Appendix E – Geotechnical Report)</b>  <b>No Impact.</b> There are no Alquist-Priolo zones located within the City, the greater Chicago/Linden neighborhood or the project area. Further, project site and surrounding area does not contain any known fault line and the potential for fault rupture is non-existent. No impact is anticipated.				
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>6ii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones)</b>  <b>Less Than Significant Impact.</b> The San Jacinto Fault Zone, located approximately 9 miles from the project site, in the northeastern portion of the City, or the Elsinore Fault Zone, located in the southern portion of the city's Sphere of Influence, have the potential to cause moderate to large earthquakes that would cause significant ground shaking. The proposed project will be required to comply with California Building Code regulations, which have been designed to reduce impacts to persons or property in the event of a significant earthquake. Therefore, impacts associated with strong seismic ground shaking will be less than significant.				
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>6iii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report)</b>  <b>Less Than Significant Impact.</b> The project site is located in an area with low potential for liquefaction as depicted in the GP 2025 Liquefaction Zones Map – Figure PS-2. Site-specific geotechnical analysis will be required by the City as part of the building permit process, to assess the suitability of on-site soils for the structures proposed. The proposed project will also be required to comply with the California Building Code regulations, to ensure that impacts related to seismic-related ground failure, including liquefaction, are reduced to less than significant levels directly, indirectly and cumulatively.				
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>6iv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix E – Geotechnical Report, Title 18 – Subdivision Code, Title 17 – Grading Code)</b>  <b>No Impact.</b> The project site is in an area with generally flat topography and is not located in an area prone to landslides per Figure 5.6-1 of the General Plan 2025 Program Final PEIR. Therefore, there will be no impact related to landslides directly, indirectly and cumulatively.				



b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>6b. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code)				
<p><b>Less Than Significant Impact.</b> The implementation of the proposed project will involve ground-disturbing activities, such as grading, that could potentially result in soil erosion. Given that the proposed project area is over one acre, state and federal requirements call for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The proposed project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. In addition, all projects must comply with Title 18 and Title 17 of the Municipal Code, which require the implementation of measures designed to minimize soil erosion. Compliance with state and federal requirements as well as with the Municipal Code will ensure that impacts to soil erosion or loss of topsoil will be less than significant.</p>				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>6c. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report)				
<p><b>Less Than Significant Impact.</b> The proposed project is currently developed and has a generally flat topography. The proposed project will be required to complete a site-specific soils analysis prior to issuance of building permits, to ensure that structures are not placed on expansive soils. This analysis will also determine whether special construction techniques are required for the size and structure of the proposed apartments. However, since the site has been developed with two-story structures in the past, it is not expected that significant soil remediation will be required. With the implementation of this standard requirement, the proposed project will have less than significant impacts relating to unstable soils.</p>				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>6d. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, General Plan 2025 Update 2018 Figure PS-3 Soils with High Shrink-Swell Potential, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)				
<p><b>No Impact.</b> The proposed project consists of a development on a previously developed site. The proposed project does not occur on expansive soils, according to General Plan 2025 Figure PS-3: Soils with High Shrink-Swell Potential. The project will adhere to the California Building Code adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code. With the implementation of these standard requirements, the proposed project will have no impact resulting in substantial risks to life or property due to expansive soils directly or indirectly or cumulatively.</p>				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>6e. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)				
<p><b>No Impact.</b> The entire Chicago-Linden neighborhood, including the project site, is currently served by sewer infrastructure which has capacity to accommodate the proposed project. Sewer line connections along 7<sup>th</sup> street and Chicago Avenue will service the project site. No septic systems would be constructed as a result of the proposed project. Therefore, there will be no direct, indirect or cumulative impact.</p>				

<b>7. GREENHOUSE GAS EMISSIONS.</b>				
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**7a. Response: (Source: South Coast Air Quality Management District's 2007 Air Quality Management Plan, CalEEMod 2016 Model, Riverside Restorative Growthprint – Climate Action Plan)**

**Less Than Significant Impact.** The proposed project includes the development of 65 apartment units, a community center and a small commercial building. The proposed project will occur on a site that has had existing, older structures for a number of years. These structures were not energy efficient, and not subject to current energy efficiency regulations. The same modeling tool used to determine air quality impacts was used to model greenhouse gas emissions for the proposed project. Greenhouse gas emissions are cumulative, insofar as the emissions accumulate in the atmosphere even when emitting activities stop. Operational activities will occur on the site for the life of the project. Construction emissions are short term, and will end when construction is complete. However, as required by SCAQMD, construction emissions are amortized over a 30 year period. As shown in Table 4, the implementation of the proposed project is likely to generate 209.22 metric tons per year (amortized), resulting from construction; and 1,079.10 metric tons of GHGs annually during the operation of the project.

**Table 1**  
**GHG Emissions from Construction of the Entrada Housing Development**  
**(metric tons per year)**

	<b>CO2</b>	<b>CH4</b>	<b>N2O</b>	<b>CO2e</b>
Construction Activities	208.27	0.04	0.00	209.22
Operational Activities <sup>1</sup>	1,054.12	0.60	0.00	1,079.10

Source: CalEEMod Version 2016.3.1. CalEEMod output tables generated 4.23.18. Values shown represent the total GHG emission projections.

1. Operation GHG emissions include area, energy, mobile, waste, and water source emissions.

SCAQMD has not formally adopted a significance threshold for GHG emissions associated with residential projects. On December 5, 2008, the SCAQMD formally adopted a greenhouse gas significance threshold of 10,000 MTCO<sub>2</sub>e/yr that only applies to stationary sources for industrial uses where SCAQMD is the lead agency (SCAQMD Resolution No. 08-35). This threshold was adopted based upon an October 2008 staff report and draft interim guidance document<sup>2</sup> that also recommended a threshold for all projects using a tiered approach.

It was recommended by SCAQMD staff that a project's greenhouse gas emissions be considered significant if it could not comply with at least one of the following "tiered" tests:

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the project below an absolute threshold (10,000 MTCO<sub>2</sub>e/yr for industrial projects; 3,000 MTCO<sub>2</sub>e/yr for residential and commercial projects)?
- Tier 4: Is the project below a (yet to be set) performance threshold?
- Tier 5: Would the project achieve a screening level with off-site mitigation?

The proposed project is consistent and compliant with Tier 3, in that the project is considered a residential project with an absolute threshold below 3,000 MTCO<sub>2</sub>e/yr.

Furthermore, the project will be required to comply with the City's General Plan policies, statewide Title 24 Building Code requirements designed to reduce GHG emissions, and City GHG reduction programs. The proposed project will improve energy efficiency in this area by replacing older, inefficient structures with efficiently constructed buildings, resulting in a beneficial impact relating to greenhouse gas emissions.

Based on the above analysis, the project's greenhouse gas emissions would be less than significant directly, indirectly and cumulatively.

<sup>2</sup> Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, prepared by SCAQMD, October 2008.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>7b. Response: (Source: South Coast Air Quality Management District's 2007 Air Quality Management Plan, CalEEMod 2016 Model, Riverside Restorative Growthprint – Climate Action Plan)</b></p> <p><b>Less Than Significant Impact.</b> The SCAQMD supports State, Federal and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and other rules it implements and has established an interim Greenhouse Gas (GHG) threshold. As indicated above, the proposed project would comply with the City's General Plan policies, State Building Code provisions designed to reduce GHG emissions, and the City's GHG reduction programs. Projects that are consistent with the projections of employment and population forecasts identified by the SCAG are considered consistent with the AQMP growth projections, since these forecast numbers were used by SCAG's modeling section to forecast travel demand and air quality for planning activities such as the RTP, the SCAQMD's AQMP, RTIP, and the Regional Housing Plan.</p> <p>Furthermore, in 2014 the City of Riverside was one of twelve municipalities that collaborated with Western Riverside Council of Governments (WRCOG) on the Subregional Climate Action Plan which provided the city a basis of emission reduction targets and measures as well as action steps that served as a foundation for the Riverside Restorative Growthprint – Climate Action Plan (CAP). The City's CAP stated that in 2010 communitywide CO2e emissions totaled 2,617,540 metric tons. In order to achieve the state-wide AB 32 goal and Executive Order (EO) S-3-05, which aim for a reduction of 80% below 1990 levels, the City has targeted a reduction of 1,542,274 metric tons of CO2e. The proposed project would generate 1,079.10 metric tons of CO2e annually, an increase of less than 1%. In addition, the proposed project will be required to install energy efficient appliances and would be built under current California Building Energy Efficiency Standards (Title 24, Part 6) thus resulting in buildings that will further contribute to reductions in CO2e when compared to the older buildings which occur or have occurred on-site.</p> <p>The proposed project is not anticipated to conflict with any applicable plan, policy or regulation related to the reduction in the emissions of GHG and thus impacts will be less than significant.</p>				

<b>8. HAZARDS &amp; HAZARDOUS MATERIALS.</b> Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>8a. Response:</b> <i>(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code)</i>  <b>Less Than Significant Impact.</b> The development of apartment units will not result in the transport of hazardous materials. The residential use of the site would typically include limited storage and use of hazardous materials such as oils, solvents, pesticides, electronic waste, and other materials associated with housekeeping and landscaping activities. These materials would be stored on site in small quantities, and therefore would not pose a significant threat to the public. Oversight by the appropriate federal, state, and local agencies, and compliance by the new development with applicable regulations related to the handling, storage and disposal of hazardous materials will cause the project to have a less than significant impact.				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>8b. Response:</b> <i>(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside's EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan)</i>  <b>Less Than Significant Impact.</b> During project construction certain types of hazardous materials, for instance diesel fuels, will be used on site. A Storm Water Pollution Prevention Plan (SWPPP), listing Best Management Practices (BMPs) to prevent construction pollutants and products from violating any water quality standard or waste discharge requirement would be prepared for the proposed project. The release of any spills would be prevented through the implementation of BMPs.  Upon operation, the proposed project would create a use that is consistent with the surrounding residential development. Thus, the project will involve the limited use of hazardous materials for household use in small quantities, and will comply with all applicable federal, state, and local laws and regulations pertaining to the use, disposal, handling and storage of hazardous waste, which are designed to protect against the risk of upset or accident. As such, the proposed project will comply with existing regulations which will ensure that the public would not be exposed to any unusual or excessive risks related to hazardous materials. For this reason, impacts associated with accidental release of hazardous materials will be less than significant.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>8c. Response:</b> <i>(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations)</i>  <b>No Impact.</b> Although small amounts of household hazardous materials and/or waste will be used and stored within individual apartments, and the site is located less than ¼ mile from the John W. North High School, the limited use of household cleaning products will not pose a hazard to the school. No impact is anticipated.				

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>8d. Response:</b> <i>(Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)</i>  <b>No Impact.</b> A review of hazardous materials site lists compiled pursuant to Government Code Section 65962.5 found that the project site is not included on any such lists, nor is it adjacent to such a site. Therefore, the project would have no impact relating to the creation of any significant hazard to the public or environment directly, indirectly, or cumulatively.				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>8e. Response:</b> <i>(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)), Airport Land Use Commission (ALUC) Development Review – Director’s Determination)</i>  <b>No Impact.</b> The project area is located within Airport Compatibility Zone E of the March Air Reserve Base/Inland Port Airport Influence Area (AIA). As a result of this, the project proponent submitted a development review application pursuant to the Riverside County Airport Land Use Commission (ALUC) Resolution No. 15-01. ALUC staff reviewed the proposed project. On November 9, 2017, ALUC issued a letter that determined that the proposed project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Therefore, the project will have no impact resulting in a safety hazard for people residing or working within an airport land use plan or within two miles of an airport.				
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>8f. Response:</b> <i>(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas)</i>  <b>No Impact.</b> Given that the project area is not located within proximity of a private airstrip, and does not propose a private airstrip, the construction and subsequent operation of the proposed project, a residential development, will not expose people residing or working in the city to a safety hazard related to a private airstrip and would have no impact directly, indirectly or cumulatively.				
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>8g. Response:</b> <i>(Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials)</i>  <b>Less Than Significant Impact.</b> The proposed project will have entry points via 7 <sup>th</sup> Street, a local collector street, and Chicago Avenue, a major roadway. This will allow the project to have access to the city’s network of streets, which have been designed to meet the Public Works and Fire Departments’ specifications. The alley located directly north of the project site will be temporarily closed from its entrance on Chicago Avenue due to paving and other upgrades during the construction of the project. Even so, the surrounding developments will not be significantly impacted since there are multiple exit and entry points that will remain available. After the project’s completion, the alley will be restored. Thus, it is anticipated that the proposed project will have a less than significant impact directly, indirectly or cumulatively to an emergency response or evacuation plan.				

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>8h. Response:</b> <i>(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside’s EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM’s Strategic Plan)</i></p> <p><b>No Impact.</b> The project site, and greater Chicago Linden neighborhood, are located in an urbanized area where no wildland fire hazards occur. Additionally, the project site is not located within a Very High Fire Severity Zone (VHFSZ) or adjacent to wildland areas or a VHFSZ. For this reason, no impact will occur regarding wildland fires either directly, indirectly and cumulatively.</p>				

<b>9. HYDROLOGY AND WATER QUALITY.</b>				
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9a. Response: (Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water; GP 2025 Figure 5.8-1 Watersheds)</b>  <b>Less Than Significant Impact.</b> The project site has been developed with close to 100 percent of impervious surface with the exception of landscaped areas. Upon construction of the buildings and parking lots for this project, the permeable area of the project site will increase slightly with additional landscaped area. The project site is located within the Santa Ana River Watershed (GP 2025 Figure 5.8-1). There is a potential for water quality impacts to occur without proper controls. For instance, soils loosened during grading, spills of fluids or fuels from vehicles and equipment or miscellaneous construction materials and debris, if mobilized and transported offsite in overland flow, could degrade water quality. Given that the area of ground disturbance affected by construction of the proposed project would exceed one acre, the proposed project is subject to the requirements of the statewide National Pollutant Discharge Elimination System (NPDES) stormwater permit for construction activity (Order 98-08 DWQ). A Water Quality Management Plan (WQMP) will be required for the proposed project to comply with the requirements of the local NPDES Stormwater Program. The proponent of the proposed project would implement a SWPPP listing BMPs to prevent construction pollutants and products from violating any water quality standards or waste discharge requirements. As a result of this standard requirement, impacts would be less than significant.				
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9b. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), RPU Urban Water Management Plan)</b>  <b>Less Than Significant Impact.</b> Potable drinking water would be supplied to the proposed project by the City of Riverside Public Utilities (RPU). A 48-inch water transmission main runs along 7 <sup>th</sup> Street and will offer connections for the proposed project. The existing water distribution lines, including the 7 <sup>th</sup> Street main, provide adequate water volume and pressure. Approximately 97 percent of the water supplied by RPU is supplied from Bunker Hill, Riverside North and South, and the Gage Exchange groundwater basins. The Bunker Hill basin is adjudicated, and its safe-yield and export rights from the basin are well defined. While not adjudicated, the Colton, Riverside North, and Riverside South basins are subject to management under a 1969 judgment. None of these basins are over-drafted, nor are they projected to become so. The proposed project would be consistent with the city's and the Chicago-Linden Strategic Plan's growth projections; therefore, operational use of groundwater is expected to be less than significant.				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9c. Response: (Source: "The Chicago-Linden Strategic Plan, 2014"; "Report on Master Drainage Plan for the City of Riverside (university Area): Zone One," prepared by the Riverside County Flood Control and Water Conservation District, July 1967. "Riverside General Plan 2025: Public Facilities and Infrastructure Element," prepared by the City of Riverside, Amended November 2012.)</b>  <b>Less Than Significant Impact.</b> As described above, the proposed project area has been covered with extensive impervious surfaces, with the exception of landscaped areas, for many years. There are no streams or rivers adjacent to the project area. The drainage patterns of the project area and overall neighborhood are well established, and the proposed project is not likely to change those patterns since the project area is currently serviced by the city's storm drain system which is comprised of gutters, pipes, inlets and culverts that carry rainwater flows to the Santa Ana River. The subject site is located within the central portion of the University drainage basin. An 18-inch concrete storm drain and reinforced concrete pipe (RCP) along				

Chicago Avenue conveys localized drainage. This existing facility is adequate and will not need to be upgraded in order to service the proposed project. The subject site is well protected by existing flood control retention and drainage improvements. Furthermore, there are no known drainage issues or problems within the neighborhood. Therefore, with the use of existing facilities not warranting the construction of additional facilities, the project will have no impact resulting in the construction of new storm water drainage facilities or the expansion of existing facilities. The project will be required to prepare and implement a Water Quality Management Plan for the prevention of erosion and siltation during construction and operation. The City will require approval of drainage system improvements that meet its standards and do not create erosion hazards. Therefore, with implementation of the City's standard requirements, the project will have a less than significant impact directly, indirectly or cumulatively to existing drainage patterns.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

**9d. Response:** (Source: "The Chicago-Linden Strategic Plan, 2014"; "Report on Master Drainage Plan for the City of Riverside (University Area): Zone One," prepared by the Riverside County Flood Control and Water Conservation District, July 1967. "Riverside General Plan 2025: Public Facilities and Infrastructure Element," prepared by the City of Riverside, Amended November 2012.)

**Less Than Significant Impact.** As explained in Response 9c, the project site is currently serviced by an existing storm drain system that includes an 18-inch concrete storm drain and reinforced concrete pipe (RCP) along Chicago Avenue which conveys localized drainage. The alley to the north of the project site has historically experienced flooding unrelated to the project site. The proposed project will drain to the south, and will manage on-site flows to meet City standards. Therefore, the proposed project will have no impact on the alley to the north of the site. Drainage issues associated with the alley to the north will be addressed through the project's site-specific hydrology study, which is a standard requirement of the City prior to the issuance of grading permits. The proposed project would require grading of the project site which would affect the drainage patterns of the site. However, drainage patterns would remain similar to existing conditions. The project site's drainage plan would be designed by a registered civil engineer to safely retain, detain, and/or convey stormwater runoff, including storm flows from the alley to the north, preventing flooding on- or off-site. Impacts would be less than significant.

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

**9e. Response:** (Source: "The Chicago-Linden Strategic Plan, 2014"; "Report on Master Drainage Plan for the City of Riverside (University Area): Zone One," prepared by the Riverside County Flood Control and Water Conservation District, July 1967. "Riverside General Plan 2025: Public Facilities and Infrastructure Element," prepared by the City of Riverside, Amended November 2012.)

**Less Than Significant Impact.** Within the scope of the project is the installation of a storm water drainage system concurrent with the construction of this project. The storm water drainage system will be adequately sized to accommodate the drainage created by this project.

The project is expected to generate the following pollutants: sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, bacteria and viruses, oil and grease, and pesticides. These expected pollutants will be treated through the incorporation of BMPs within the site design, including source control and treatment control measures specified in the project specific WQMP.

Therefore, as the expected pollutants will be mitigated through the project site design, source control and treatment controls already integrated into the project design, the project will not create or contribute runoff water exceeding capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff and there will be a less than significant impact.



f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>9f. Response:</b> (Source: “The Chicago-Linden Strategic Plan, 2014”; “Report on Master Drainage Plan for the City of Riverside (University Area): Zone One,” prepared by the Riverside County Flood Control and Water Conservation District, July 1967. “Riverside General Plan 2025: Public Facilities and Infrastructure Element,” prepared by the City of Riverside, Amended November 2012.)</p> <p><b>Less Than Significant Impact.</b> Given that the project site is over one acre in size, the proposed project will be required to submit a Water Quality Management Plan (WQMP) that will comply with the requirements of the local NPDES Stormwater Permit and have coverage under the State’s General Permit for Construction Activities. The proposed project would implement a SWPPP listing BMPs to prevent construction pollutants and products from violating any water quality standards. The purpose of this requirement is to ensure treatment BMPs are installed/constructed as part of the project so that the pollutants generated by the project will be treated in perpetuity. For this reason, impacts related to degrading water quality are less than significant directly, indirectly and cumulatively.</p>				
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>9g. Response:</b> (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps)</p> <p><b>No Impact.</b> The project area is not located in a FEMA-designated Special Flood Hazard Area per FEMA’s National Flood Insurance Rate Map 06065C0726G dated August 28, 2008. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project will not place a structure within a 100-year flood hazard area that would impede or redirect flood flows and no impact will occur directly, indirectly or cumulatively.</p>				
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>9h. Response:</b> (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps Enter zone and panel number)</p> <p><b>No Impact.</b> The project area is not located in a FEMA-designated Special Flood Hazard Area, as described in response 9g., above. No impact will occur.</p>				
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>9i. Response:</b> (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps)</p> <p><b>No Impact.</b> The project site is not located within or near a flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Hazard Areas or the National Flood Insurance Rate Map (Map Number 06065C0726G dated August 28, 2008). For this reason, the proposed project will not place structures within a flood hazard or dam inundation area that would expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam and therefore no impact will occur.</p>				
j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>9j. Response:</b> (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)</p> <p><b>No Impact.</b> Tsunamis are a phenomenon that occurs in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis will occur. In addition, the proposed project site and surroundings have generally flat topography in an urbanized area where mudflows will not occur. The project site is not in the vicinity of any of the lakes, rivers or streams that have been mapped in the City, and will therefore not be impacted by seiches. Therefore, no impact associated with tsunamis, seiches or mudflow are expected.</p>				

<b>10. LAND USE AND PLANNING:</b>				
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>10a. Response:</b> <i>(Source: General Plan 2025 Land Use and Urban Design Element, Entrada Housing Project site plan, City of Riverside GIS/CADME map layers)</i></p> <p><b>Less Than Significant Impact.</b> The greater Chicago-Linden neighborhood currently consists of a mix of residential development. In 2014, the city adopted the Chicago-Linden Strategic Plan in order to provide guidance on revitalizing and improving affordable housing options within the neighborhood. The project is consistent with the Chicago-Linden Strategic Plan, insofar as it implements its goals of improving living conditions in the neighborhood, and creates a cohesive community that integrates services and recreation into the project site.</p> <p>Residents within existing buildings will be relocated in compliance with the requirements of State law, as necessary, and new units for very low and low income households created. Further, the physical division of an established generally refers to a linear feature or the removal of access that separates an existing community from other areas. The proposed project does not include these components. Instead the proposed project, through the community center and commercial components, would further connect the community. Impacts are expected to be less than significant as a result of the proposed project.</p>				
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>10b. Response:</b> <i>(Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Chicago-Linden Strategic Plan, Title 19 – Zoning Code)</i></p> <p><b>Less Than Significant Impact.</b> The proposed project is a direct result of the implementation of programs and policies within the Chicago-Linden Strategic Plan, which provides guidance for the improvement of the neighborhood.</p> <p>Program 1.2 and Policy 2 are directly fulfilled by the proposed project. Program 1.2 of the Plan stipulates the development of “high quality multi-family (29-35) and mixed use project for Housing Authority-owned properties at 1705, 1725, and 1733 7<sup>th</sup> Street, incorporating neighborhood daycare”. Policy 2, states “Continue the Housing Authority’s commitment to owning and operating affordable housing in the Chicago-Linden neighborhood”, which will also be implemented by the project. Policy 5, “Improve the quality of life for Chicago-Linden neighborhood residents” and Program 5.1 “Implement a broad range of activities at the Community Center. etc” will also be implemented by the proposed project. Although the community center cited in the Plan was proposed at a different location, the activities and programs could be used in the project’s community center component.</p> <p>In addition, the Housing Element’s Objective H-2, aims “To provide adequate diversity in housing types and affordability levels to accommodate housing needs of Riverside residents, encourage economic development and sustainability, and promote an inclusive community.” The proposed project would provide an added 65 units of affordable housing to the city’s housing stock thus implementing Objective H-2. Policy H-2.6 states that “Collaborative Partnerships. Seek, support, and strengthen collaborative partnerships of nonprofit organizations, the development community, and local government to aid in the production of affordable and market rate housing,” which the project proponent is intending to fulfill by developing an underutilized area into a more viable and safe residential community. The project proponent is seeking a reduction in the required number of on-site parking spaces as a concession pursuant to the Density Bonus Ordinance in order to facilitate the development of affordable housing units. Policy H-2.7 provides the basis for the approval of this concession, “Housing Incentives. Facilitate the development of market rate and affordable housing through the provision of regulatory concessions and financial incentives, where feasible and appropriate.” For these reasons, the proposed project will carry out several of the General Plan 2025 objectives and policies and would thus be consistent with its goals.</p> <p>The applicant has also entered into an Affordable Housing Agreement, which according to Riverside Municipal Code Chapter 19.545.080 Affordable Housing Agreement the project proponent is eligible to receive a concession in development standards. The project proponent is seeking reduced parking requirement in order to accommodate the 65 affordable rental units and supplemental amenities.</p>				

Even though the development of the site was outlined in the Strategic Plan, the proposed project will require a General Plan Amendment and a Zone Change in order to develop the site as proposed. The project will be designed to be consistent with the pattern of development of the surrounding area, providing adequate access, circulation and connectivity consistent with the General Plan 2025, and will be in compliance with the requirements of the Zoning and Subdivision Codes, once the appropriate changes are approved.

#### General Plan

The Medium Density Residential (MDR) designation allows for the construction of up to 6.2 dwelling units per acre or 18.6 persons per acre or, with an approved PRD, 24 persons per acre. The project proponent is proposing a General Plan Amendment to change the land use designation for the 2.03 net acres included in the project to High Density Residential (HDR) which allows 29 dwelling units per gross acre. A mix of residential and commercial development surrounds the project site. As described above, the project is also consistent with the Chicago-Linden Strategic Plan, and implements its policies and programs. As a result, impacts of the General Plan Amendment will be less than significant.

#### Zoning Ordinance

The subject site is zoned R-1-7000 – Single Family Residential. The project is proposing a Zone Change to R-3-1500 – Multiple-Family Residential, which will allow the development of the project site at the density proposed. The project is consistent with the development standards of the Chicago-Linden Strategic Plan and will conform to these standards. Project review procedures for all uses also require Design Review approval by the City’s Development Review Committee (DRC), pursuant to Section 19.710.020(D) of the Riverside Municipal Code.

Impacts associated with the implementation of the project will be less than significant.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

☐
☐
☐
☒

#### **10c. Response: (Source: General Plan 2025, General Plan 2025 – Figure LU-10 – Land Use Policy Map)**

**No Impact.** The greater Chicago-Linden neighborhood, including the project site, is an urbanized area and does not contain any designated conservation lands. The project is within the boundary of the Western Riverside MSHCP, and will be responsible for the payment of fees, if applicable. However, the project is not within or in the vicinity of a conservation area, as defined by the Plan, due to its urbanized character. The neighborhood is not identified as being within, and therefore will not impact, an adopted Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan directly, indirectly and cumulatively. Therefore, the proposed project will have no impact on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

<b>11. MINERAL RESOURCES.</b>				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11a. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)</b>  <b>No Impact.</b> The proposed project is located within an established urban core where extensive development was occurred. Furthermore, according to the 2025 General Plan, the project is located in a State-classified MRZ-3 Mineral Resources Zone indicating that the area contains known or inferred mineral occurrences of undetermined mineral resource significance (Figure OS-1 – Mineral Resources). The project area is not, nor is it adjacent to, a locally important mineral resource recovery site delineated in the 2025 General Plan. Thus, the project will have no impact on mineral resources directly, indirectly or cumulatively.				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)</b>  <b>No Impact.</b> As described above, the project site is not, nor is it adjacent to a locally important mineral resource recovery site delineated in the 2025 General Plan (see 11a discussion). Given that the site is fully developed and has been designated for residential land uses for decades, no mineral extraction has occurred in the greater Linden-Chicago neighborhood or in the areas adjacent to the neighborhood. For this reason, there will be no impacts associated with the loss of important mineral resources.				

<b>12. NOISE.</b> Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>12a. Response:</b> (Source: General Plan Figure N-1 – 2003 Roadway Noise Figure N-5 (2025 Roadway Noise), N-6 (2025 Freeway Noise) and N-7 (2025 Railroad Noise), Figure N-10 (2025 Noise/Land Use Noise Compatibility Criteria))</p> <p><b>Less Than Significant Impact.</b> The proposed project is compatible with the existing residential character and land use pattern of the neighborhood. The project does not involve construction of any significant long-term sources of noise, such as new roadways, freeways, railroads, or airports. However, the proposed project will result in the construction of a new residential development that is comprised two- and three-story townhome style apartment buildings as well a community center, commercial building, and parking lot. The project will also include improvements to the existing sidewalks. The primary source of noise associated with build out of the project will be from construction activity. Specifically, noise from large diesel engines, grading equipment, truck deliveries, and hauling vehicles will increase noise levels within the community temporarily. Riverside Municipal Code Section 7.35.010(B)(5) regulates the allowable hours of construction activity to 7:00 A.M. to 7:00 P.M. on weekdays and 8:00 A.M. to 5:00 P.M. on Saturdays, with no construction activities allowed on Sunday or Federal holidays. In addition, the Municipal Code limits noise levels from construction activities to the maximum permitted exterior noise level for the affected land use. Noise impacts could be disruptive, but will be temporary and periodic as demolition, grading, and construction occur.</p> <p>Once these activities are completed, noise levels can be expected to return to current levels, consistent with a residential neighborhood. The proposed project will occur in an area that is currently urbanized. According to the General Plan (Figure N-6), future roadway noise from Chicago Avenue and freeway noise from Interstate 215, ranging between 60 and 65 CNEL will encroach onto the subject property in portions of the site where development is proposed. CNEL represents an averaging, weighted for time of day, of the noise levels on a project site over a 24 hour period. According to the General Plan (Figure N-10), noise levels up to 65 CNEL are considered normally acceptable noise levels for multi-family residential units and hotels/motels. Furthermore, the application of standard construction techniques consistent with the current Building Code requirements provides noise attenuation of approximately 20 dBA. Therefore, interior noise levels can be expected to range between 40 and 45 dBA CNEL, also consistent with General Plan standards. Finally, the City requires the preparation and submittal of an acoustical analysis with the submittal of plans for building permit plan check. This standard requirement assures that the project's noise levels will be consistent with City standards, and that impacts associated with long term noise levels will be less than significant. Therefore, proposed land uses are expected to be compatible with future traffic noise levels onsite.</p> <p>Operational noise associated with day-to-day activities of residents is expected to be very limited, and consistent with the noise levels that now occur in the neighborhood. City standard requirements such as General Plan Objective N-1 which requires the minimization of noise levels from point sources throughout the community and, wherever possible, mitigate the effects of noise to provide a safe and healthful environment, will assure that noise levels remain less than significant.</p>				
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>12b. Response:</b> (Source: General Plan Figure N-1 – 2003 Roadway Noise)</p> <p><b>Less Than Significant Impact.</b> Demolition, grading, and construction activities facilitated by the proposed project will result in short-term, temporary ground-borne noise and vibration that could affect residents surrounding the project area. Vibration sources will likely include heavy construction equipment, such as large bulldozers and jackhammers. Construction-related vibration will be short-term and temporary and will cease once construction is complete. The project will be required to comply with the City's noise standards, as discussed in item 12a., above. Compliance with these standards will assure that impacts associated with vibration will be less than significant directly, indirectly or cumulatively.</p>				
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>12c. Response:</b> (Source: General Plan Figure N-1 – 2003 Roadway Noise)</p>				

<p><b>Less Than Significant Impact.</b> Buildout of the project will result in a net increase of 65 dwelling units, one community center, and one 900 square foot commercial building and a parking lot in the subject site. These land uses are compatible with existing land use patterns and the residential character of the neighborhood. Construction noise will be periodic and temporary. Once complete, noise levels are not expected to result in noticeable changes in the community noise environment. Primary noise sources can be expected to include lawn and HVAC equipment and vehicular traffic typical of a residential community. The community center is expected to serve the immediate neighborhood population and not attract a substantial number of new vehicles (or vehicular noise) from outside the neighborhood. The enhancement of alleys and sidewalks, as facilitated by the proposed project will improve pedestrian and bicycle access to the community center, Patterson Park, and other local destinations, and may reduce traffic-related noise throughout the neighborhood. Overall long-term noise levels are not expected to significantly increase, and impacts will be less than significant.</p>				
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>12d. Response: (Source: FPEIR Table 5.11-J – Construction Equipment Noise Levels, Appendix G – Noise Existing Conditions Report</b></p> <p><b>Less Than Significant Impact.</b> The primary source of temporary or periodic noise associated with build out of the proposed project will be from construction activity. Although periodic and temporary, construction noise can be expected to increase ambient noise levels over existing conditions. This increase may be particularly noticeable and disruptive to residential units adjacent to the project area. The construction period is expected to require less than a year, with the early grading and site preparation stages causing the highest increases in noise levels. Once vertical construction begins, noise levels will be less elevated, and primarily associated with power tools and lighter weight equipment.</p> <p>Both the General Plan 2025 and Municipal Code Title 7 (Noise) limit construction activities to specific times and days of the week. These limitations assure that construction noise occurs during the less sensitive daytime hours. During the more sensitive evening and nighttime periods, construction will not be permitted. Considering the short-term nature of construction and the provisions of the Noise Code, the temporary and periodic increase in noise levels due to construction projects is expected to be less than significant.</p>				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>12e. Response: (Source: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)) , Airport Land Use Commission (ALUC) Development Review – Director’s Determination )</b></p> <p><b>No Impact.</b> The project area is located within Airport Compatibility Zone E of the March Air Reserve Base/Inland Port Airport Influence Area (AIA). As a result of this, the project proponent submitted a development review application pursuant to the Riverside County Airport Land Use Commission (ALUC) Resolution No. 15-01. ALUC staff reviewed the proposed project. On November 9, 2017, ALUC issued a letter that determined that the proposed project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Therefore, the project will have no impact resulting in a safety hazard for people residing or working within an airport land use plan or within two miles of an airport.</p>				
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>12f. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Area)</b></p> <p><b>No Impact.</b> The proposed project is not located in the vicinity of a private airstrip. Thus, the proposed project will not expose people residing or working to excessive noise levels either directly, indirectly or cumulatively.</p>				

<b>13. POPULATION AND HOUSING.</b>					
Would the project:					
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>13a. Response: (Source: General Plan 2025 Table LU-3 – Land Use Designations)</b></p> <p><b>Less Than Significant Impact.</b> In the 2014 Chicago-Linden Strategic Plan, the addition of new residential complexes was analyzed as well as the development of a new community center, which was intended to serve the social and recreational needs of residents in the greater Chicago-Linden neighborhood.</p> <p>The proposed project will result in the construction and operation of a residential complex which will be composed of 65 dwelling units that could marginally induce population growth. With an average household size of 3.56 persons per household in the project area, the proposed project could result in an additional 232 residents. However, the site has been previously occupied by multi-family dwellings in multiple apartment buildings, and although the total number of residents previously within the project boundary is unknown, the proposed project is likely to result in a similar number of residents as have previously occurred.</p> <p>According to the California Department of Finance – Demographic Research Unit’s Report E-1, the City of Riverside’s currently population is 326,792. The proposed project would represent a limited population increase of less than 1% over existing conditions. In addition, the project is intended to serve the social and housing needs for the broader Eastside population thus improving housing opportunities for the area’s residents. For these reasons, the proposed project will not result in substantial population growth in an area, either directly, indirectly or cumulatively.</p>					
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>13b. Response: (Source: CADME Land Use 2003 Layer)</b></p> <p><b>Less Than Significant Impact.</b> The project involves the redevelopment of an underutilized site and will displace existing people/residents; however, the displacement impact will be less than significant directly, indirectly and cumulatively because residents have been relocated, and additional affordable housing units will result from implementation of the project. The project site previously contained a total of 41 units, and will be replaced with a total of 65 units. The project is consistent with the General Plan 2025 objectives and policies. For example, the Housing Element’s Objective H-2, aims “To provide adequate diversity in housing types and affordability levels to accommodate housing needs of Riverside residents, encourage economic development and sustainability, and promote an inclusive community.” The proposed project would provide and added 65 units of affordable housing to the city’s housing stock thus implementing Objective H-2. Policy H-2.6 states that “Collaborative Partnerships. Seek, support, and strengthen collaborative partnerships of nonprofit organizations, the development community, and local government to aid in the production of affordable and market rate housing,” which the project proponent is intending to fulfill by developing an underutilized area into a more viable and safe community. The project proponent is seeking a reduction in the required number of on-site parking spaces as a concession pursuant to the Density Bonus Ordinance in order to facilitate the development of affordable housing units. Policy H-2.7 provides the basis for the approval of this concession, “Housing Incentives. Facilitate the development of market rate and affordable housing through the provision of regulatory concessions and financial incentives, where feasible and appropriate.”</p> <p>For these reasons, the proposed project will carry out several of the General Plan 2025 objectives and policies and would thus be consistent with its goals. Impacts associated with housing unit construction and replacement will be less than significant.</p>					
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>14. PUBLIC SERVICES.</b>				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>14a. Response: (Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)</b>  <b>Less Than Significant Impact.</b> The project is in an urbanized area and has been serviced by the Fire Department in the past. The proposed project will consist of a residential component, community center, and a commercial component. Fire facilities and services are provided by Station #4, located at 3510 Cranford Avenue, 1/4 mile east of the project site. Existing water distribution lines, along 7 <sup>th</sup> Street and Chicago Avenue provide adequate water volumes and pressure, and no major expansions of the system are anticipated in order to accommodate the proposed project. With the continued implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, there will be less than significant impacts on the demand for additional fire facilities or services.				
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>14b. Response: (Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)</b>  <b>Less Than Significant Impact.</b> The proposed project implements the goals and policies of the Chicago-Linden Strategic Plan. One of the main goals of the Strategic Plan is to improve public safety in the project area, and its implementation is expected to have an overall positive impact on neighborhood safety and crime prevention. The proposed project will contribute to neighborhood improvements, including the alley improvement program, and participation in the Crime-Free Multi-Housing program. Finally, the proposed project will provide safer, more modern living conditions for residents, and encourage a sense of neighborhood through programs and services offered at the project's community center.  Police facilities and services are provided by the Neighborhood Policing Center UNET-UCR located at 1201 University Avenue, less than 1 mile east of the project. With implementation of the General Plan 2025 policies, compliance with existing codes and standards and through Police Department practices, there will be less than significant impacts on the demand for additional police facilities or services either directly, indirectly or cumulatively.				
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>14c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD)</b>  <b>Less Than Significant impact.</b> The project area is located in the Riverside Unified School District (RUSD). Based on RUSD's student generation rates of 1.4 school children per dwelling unit, the proposed project has the potential to result in approximately 91 school children. Adequate school facilities and services are provided by RUSD to serve this project. The proposed community center has the potential to host after school programs that would further support the educational and recreational needs of area students. With continued implementation of General Plan 2025 policies, compliance with existing codes and standards, and through School District impact fees used to offset the impact of new development, there will be less than significant impacts on the demand for school facilities or services either directly, indirectly, or cumulatively.				
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>14d. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types)</b>  <b>Less Than Significant Impact.</b> The ultimate build out of the proposed project will generate a less than 1% increase in the city's population. This does not constitute a substantial population increase such that additional park facilities would be required. Recreational opportunities will be provided within the project at the community center and in project common				



areas. The proposed project is within ¼ mile of Patterson Park, which offers sports and passive recreation opportunities. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Park, Recreation and Community Services practices, as well as payment of local and regional park development fees, there will be less than significant impacts on the demand for additional park facilities or services either directly, indirectly or cumulatively.

e. Other public facilities?

☐
☐
☒
☐

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

**Less Than Significant Impact.** The project consists of four residential building that will total 65 dwelling units, a community center, and small commercial building. Adequate public facilities and services, within the greater Chicago-Linden Neighborhood will serve this project. On-site amenities and infrastructure in surrounding streets have sufficient capacity to serve the proposed project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Park and Recreation and Community Services and Library practices, there will be no impacts on the demand for additional public facilities or services either directly, indirectly or cumulatively.

<b>15. RECREATION.</b>					
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>15a. Response:</b> <i>(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways)</i></p> <p><b>Less Than Significant Impact.</b> The proposed project would result in net increase of 65 dwelling units and a population increase of approximately 232 residents. This does not constitute a substantial population increase such that there will be a substantial physical deterioration of existing recreational facilities. Residents will have access to Patterson Park and its facilities, but will not over-tax these facilities. Furthermore, the proposed project will include a community center for the will be able to provide recreational services to the project site.</p>					
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>15b. Response:</b></p> <p><b>No Impact.</b> The project will include new recreational facilities at the community center and recreational opportunities in common areas. The project's facilities, however, will not have an adverse impact on the environment, and the community center's impacts have been considered throughout this Initial Study.</p>					

<b>16. TRANSPORTATION/TRAFFIC.</b> Would the project result in:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**16a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, Traffic Impact Report for the Entrada Housing Project prepared by Kunzman Associates, Inc.)**

**Less Than Significant Impact with Mitigation.** In order to estimate potential traffic associated with the site, a project-specific Traffic Impact Analysis was prepared by Kunzman Associates, Inc. (please see Appendix B). The traffic impact report is a comprehensive analysis that involved a review of existing traffic conditions, trips generated by the project, distribution of the project trips to roads outside the project, calculation of existing plus project traffic conditions, and an analysis of opening year traffic conditions without and with the project, and an analysis of buildout year traffic conditions without and with the project was include since the proposed project involves a General Plan Amendment.

Currently, the project site is partially vacant and partially developed with residential uses, which does not result in significant trips. Roadways adjacent to the site include Chicago Avenue to the east, and 7<sup>th</sup> Street to the south. The proposed project will have access to both Chicago Avenue and 7<sup>th</sup> Street.

As stated above, the proposed project requests a General Plan Amendment to change the existing General Plan Land Use designation for 1.88 acres from MDR – Medium Density Residential to HDR – High Density Residential and a Rezoning to change the zone of the entire 2.03-acre (net) site from R-1-7000 – Single-Family Residential to R-3-1500 – Multiple-Family Residential. The R-1-7000 zone allows for development of a maximum of 6.3 single-family detached residential dwelling units per gross acre (or up to 8 per acre with a Planned Residential Development Permit); the R-3-1500 allows for a maximum of 29 multi-family attached residential dwelling units per gross acre.

At current conditions the project site of 2.63 gross acres allows for 21 single-family detached dwellings units, which are projected to generated 189 daily vehicle trips. As shown in Table 5 below, the proposed project, including the apartments, community center and commercial space, will generate a total of 990 daily trips. This estimate is conservative, insofar as the commercial building and community center will be geared to project residents, rather than outside the area, but its space was included in order to assure that all potential trips were considered. It is assumed that a portion of the commercial space generated trips, which are characterized as a convenience market land use in the table below, will come from pass-by trips. The project trips have been reduced based upon the City of Riverside Public Works Department, Traffic Impact Analysis Preparation Guide January 2016.

**Table 5  
Entrada Housing Project  
Traffic Report Summary**

			Peak Hour						Daily
Land Use	Quantity	Units	Morning			Evening			
<u>Trip Generation Rates</u>			Inbound	Outbound	Total	Inbound	Outbound	Total	
Multifamily Housing (Low-Rise)	1.00	DU	0.11	0.35	0.46	0.35	0.21	0.56	7.32
Convenience Market	1.00	TSF	31.27	31.27	62.5	25.05	24.06	49.1	762.28
<u>Trips Generated</u>									
Multifamily Housing (Low-Rise)	65	DU	7	23	30	23	13	36	476
Convenience Market	0.900	TSF	28	28	56	23	22	44	686
<b>Subtotal</b>			35	51	86	46	35	80	1,162
<u>Pass-By Trips Reduction</u>									
Convenience Market (25%)			-7	-7	-14	-6	-6	-12	-172
<b>New Trips Generated</b>			28	44	72	40	29	68	990

In order to effectively analyze project impacts, the study intersections that were analyzed consist of Chicago Avenue at the project's North Access along 7<sup>th</sup> Street and Chicago Avenue at 7<sup>th</sup> Street. The City of Riverside allows a rating of "D" for its acceptable Level of Service (LOS) for the study intersections. Both intersections are currently operating above a D rating. In order to analyze the traffic conditions with the proposed project, existing traffic volumes are combined with areawide growth. For analysis purpose the opening year is 2020 and buildout year is 2025.

Per the traffic impact report, there is a potential for significant impact to occur at three intersections during the opening year. These intersections are Chicago Avenue at the project's north access, Chicago Avenue at 7<sup>th</sup> Street, and Chicago Avenue at the project's south access, without improvements. With the addition of a striped center median, allowing for left turns from Chicago Avenue at these locations, these locations will operate at an acceptable level. Therefore, with the implementation of the mitigation measure provided below, impacts are reduced to less than significant level, since the project will not degrade the LOS to a lower rating than D which is considered acceptable by the city.

The traffic impact report also considered the build out of the General Plan (2025) as it relates to the proposed General Plan Amendment for the project. That analysis found that, as with opening year conditions, the same three intersections at Chicago Avenue would operate at unacceptable levels. However, with the implementation of a center median, all intersections would operate at acceptable levels, as under opening year conditions. With mitigation, therefore, the General Plan Amendment and associated Zone Change would have a less than significant impact on the circulation system.

The improvements were outlined in the traffic impact report's Figure 40 which may be found in Appendix B and included site-specific circulation and access recommendations. Mitigation Measure 16-1 details the required improvements that will assure that the added 839 daily vehicle trips the proposed project will add to existing conditions create less than significant impacts to applicable plans, ordinances, policies that establish effectiveness for the performance or policy establishing measures to the performance of the circulation system, which takes into account all relevant components of the circulation system. Implementation of Mitigation Measure 16-1 will result in a less than significant impact.

b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

**16b. Response: (Source: General Plan 2025 Figure 8 – Circulation Element)**

**No Impact.** Neither Chicago Avenue nor 7<sup>th</sup> Street are included in the County's Congestion Management Program. There will therefore be no impact to the CMP.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

**16c. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas)**

**No Impact.** The subject site is not located within an airport influence area. The proposed project will not change air traffic patterns, increase air traffic levels, or change the location of air traffic patterns. For this reason, the project will have no impact directly, indirectly or cumulatively on-air traffic patterns.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>16d. Response: (Source: Project Site Plan; Traffic Impact Analysis for the Entrada Housing Project prepared by Kunzman Associates, Inc. )</b>  <b>Less Than Significant Impact.</b> The proposed project is compatible with adjacent residential developments. It has been designed so as not to cause any hazards to the surrounding area or general public. Intersections of project driveways with public streets are provided at a 90-degree angle and have sufficient sight lines to allow the safe maneuvering of vehicles onto and out of the project. In addition, the City Engineer will review project plans to assure that they meet City standards for roadway improvements and safety. As a result of this standard City requirement, project impacts associated with design hazards will be less than significant directly, indirectly, and cumulatively				
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>16e. Response: (Source: California Department of Transportation Highway Design Manual, Municipal Code, Traffic Impact)</b>  <b>Less Than Significant Impact.</b> Access to the project site will be provided by driveway entrances along 7 <sup>th</sup> Street and Chicago Avenue, as well as an entrance via an alley on the site's northern boundary. Traffic improvements facilitated by the proposed project have the potential, during their construction, to obstruct lanes of travel that may have a temporary impact on emergency access. However, the project's construction plans will be reviewed by the city, and traffic management plans developed as needed to assure traffic safety, as required by the City. The proposed project will also require plan approval by Riverside Fire Department. Impacts associated with emergency access are expected to be less than significant directly, indirectly and cumulatively.				
f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>16f. Response: (Source: General Plan 2025 Circulation Element Figure 9 – Transit Routes; Figure 10 City of Riverside Bike Paths)</b>  <b>Less Than Significant Impact.</b> The proposed project as designed is not in conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks). The added amenities would include bike lanes along Chicago Avenue, as required in the Strategic Plan. The project site is currently served by Riverside Transit Agency Routes 13 and 22 along Chicago Avenue and Routes 1, 14, 22, 204, and Gold Line along University Avenue. There will be no interruptions to these stops or routes as a result of the proposed project. Therefore, the proposed project impacts related to adopted policies, plans or programs supporting alternative transportation are less than significant directly, indirectly and cumulatively.				

<b>17. TRIBAL CULTURAL RESOURCES</b> Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>17a. Response:</b> <i>(Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Cultural Resources Report for the Chicago/Linden Strategic Plan prepared by JM Research and Consulting; Appendix C: Entrada Project Cultural Resources Survey Update for the Entrada Project, Chicago/Linden Strategic Plan prepared by JM Research and Consulting)</i></p> <p><b>No Impact.</b> The project site is located within the Chicago-Linden neighborhood. The project site has been previously developed and disturbed numerous times in association with construction of homes and roads. Only two (2) small parcels are vacant and currently undeveloped, although both have had development on them in the past. A Sacred Lands File search conducted by the Native American Heritage Commission on November 26, 2012 failed to indicate the presence of any Native American traditional cultural places or landscapes in the Strategic Plan project area, which includes the project site. Fifteen (15) Native American tribes that have tribal cultural affiliations in the project area were contacted for consultation on the proposed project by BCR Consulting, on November 30, 2012. In 2018, the city sent out SB 18 and AB 52 consultation letters to the appropriate tribal authorities in order to invite them to consult on the proposed project. As of August 2018, consultation has been conducted and concluded with the Soboba Band of Luiseño Indians, Viejas Band of Kumeyaay Indians and Morongo Band of Mission Indians.</p> <p>As described in the Cultural Resources discussion, an update to the 2013 project-specific cultural resources survey was conducted in May 2018, which included a record search, field survey and digital photography of the project area to supplement the review of previous survey efforts. In addition, the record search conducted in 2018 identified only resources that were related to the historic built environment. Since there are no prehistoric or archaeological deposits identified within a one-mile radius of the subject site, the survey concluded that there is a low level of sensitivity for buried archaeological deposits within the subject site.</p> <p>No resources were identified, and none are known to occur within the project area. Therefore, no direct, indirect or cumulative impact would occur to sites, features, places or cultural landscapes that are listed or eligible for listing in the California Register of Historic Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).</p>				
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>17b. Response:</b> <i>(Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Cultural Resources Report for the Chicago/Linden Strategic Plan prepared by JM Research and Consulting; Appendix C: Entrada Project Cultural Resources Survey Update for the Entrada Project, Chicago/Linden Strategic Plan prepared by JM Research and Consulting)</i></p> <p><b>No Impact.</b> As stated above, the proposed project area was analyzed as part the cultural resources report for the greater Chicago-Linden Strategic Plan, which included a thorough records research, historical research, and field survey have produced negative results. A focused update to the survey was conducted for the project area.</p> <p>No archaeological resources were identified, and as a result no tribal resources are expected to be adversely impacted by the proposed project. As described above, the 2018 update to the survey concluded that there is a low level of sensitivity for buried archaeological deposits within the subject site since there have not been any prehistoric or historical archaeological deposits identified within a one-mile radius of the subject site. Consulting tribes identified no specific concerns relating to</p>				

potential impacts to Tribal cultural resources, which are not known to exist on the project site, and only standard conditions relating to the treatment and disposition of inadvertent discoveries were requested.

The construction and ultimate operation of the proposed project is not expected to result in direct, indirect or cumulative impacts to resources determined by the City, 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.

<b>18. UTILITIES AND SYSTEM SERVICES.</b> Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>18a. Response:</b> (Source: General Plan 2025 Figure PF-2 – Sewer Facilities Map, FPEIR Figure 5.16-5 – Sewer Service Areas, Table 5.16-K – Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area)</p> <p><b>Less Than Significant Impact.</b> As stated in the Hydrology discussion, the project site is located within the Santa Ana River Watershed (GP 2025 Figure 5.8-1). As required by state and local law, all new development is required to comply with all provisions of the NPDES program and the City’s Municipal Separate Sewer Permit (MS4), as enforced by the Regional Water Quality Control Board (RWQCB). Implementation of this requirement will work to ensure the wastewater treatment requirements of the RWQCB are met. The site’s sewer and wastewater services are provided by the Riverside Public Utilities Department. Existing wastewater facilities in the project site’s vicinity include conveyance pipes within the right-of-way of Chicago Avenue and a sewer easement on 7<sup>th</sup> Street. The pipes along Chicago Avenue are 18-inch vitrified clay pipes. Wastewater will be disposed of via the existing sewer system, which has adequate capacity to serve the site. With the implementation of the above referenced regulatory requirements to ensure the RWQCB standards are not violated the project’s development and operation would result in less than significant impacts.</p>				
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>18b. Response:</b> (Source: General Plan 2025 Table PF-1 – RPU PROJECTED DOMESTIC WATER Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025)</p> <p><b>No Impact.</b> The site’s wastewater services are provided by the Riverside Public Utilities. Currently, there is comprehensive system of wastewater facilities in the project site’s vicinity which includes conveyance pipes within the right-of-way of Chicago Avenue and a sewer easement on 7th Street. The pipes along Chicago Avenue are 18-inch vitrified clay pipes. Although the project will intensify the density of the site, the existing sewer system has adequate capacity to serve the existing demand within the project area. The existing system has capacity to adequately serve the proposed project.</p> <p>The project is consistent with the Typical Growth Scenario of the General Plan 2025 where future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 Final PEIR). Therefore, the project will have no impact resulting in the construction of new water or wastewater treatment facilities or the expansion of existing facilities directly, indirectly or cumulatively.</p>				
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>18c. Response:</b> (Source: FPEIR Figure 5.16-2 - Drainage Facilities)</p> <p><b>No Impact.</b> The project area is currently serviced by the city’s storm drain system which is comprised of gutters, pipes, inlets and culverts that carry rainwater flows to the Santa Ana River. The subject site is located within the central portion of the University drainage basin. An 18-inch concrete storm drain and reinforced concrete pipe (RCP) along Chicago Avenue conveys localized drainage. This facility is adequate and will not need to be upgraded in order to service the proposed project. The subject site is well protected by existing flood control retention and drainage improvements. Therefore, with the use of existing facilities not warranting the construction of additional facilities, the project will have no impact resulting in the construction of new storm water drainage facilities or the expansion of existing facilities directly, indirectly or cumulatively.</p>				



d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>18d. Response:</b> (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025))  <b>Less Than Significant.</b> The City’s Urban Water Management Plan must be updated every five years to include the most recent population trends. Similarly, the City must consult with the Riverside Public Utilities regarding development projects exceeding the thresholds noted in the CEQA Guidelines Section 15155 to ensure that sufficient water supplies are available and this review took place.  Domestic water supply and demand has been projected to the year 2040 by the RPU’s Urban Water Management Plan, although the proposed project will require the adoption of a GPA and Zone Change to intensify the density of the site, the gross additional dwelling units would be 14 more than projected estimations based on land use designations. The urban water use target for 2020 is 213 gallons per capita per day (gpcd), the project’s operational year is 2020. Using the RPU’s water factor, and the project’s anticipated population of 232 persons, the project’s total demand would be 49,416 gpd. However, the project’s net additional demand (14 units and 50 people) would result in 10,650 gallons per day, or 11.93 acre feet per year. Total water supplies for RPU in the year 2020 would be 116,903 acre feet per year. The increased demand thus would be less than 1%. Water supply is projected to remain sufficient. Further, the RPU plans to increase water supplies by conjunctive use projects and recycled water infrastructure projects. Therefore, the proposed project will have a less than significant impact on water supplies either directly, indirectly or cumulatively.				
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>18e. Response:</b> (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025))  <b>Less Than Significant Impact.</b> See 18c response.				
f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>18f. Response:</b> (Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area)  <b>Less Than Significant Impact.</b> Solid waste is disposed via trash and recycling services from City approved waste haulers. All solid waste within the city is taken to the Robert A. Nelson Transfer Station, then the waste is transferred to either the El Sobrante Landfill or Lamb Canyon Landfill for ultimate disposal. There are sufficient disposal capacities within the two landfills to service the city and the proposed project.  The implementation of the city’s recycling efforts, which have earned the city recognition as a “Model City for Local Government Recycling and Waste Reduction”, will contribute to further reduce waste and limit the city’s solid waste that is diverted from ending up in landfills. Impacts will be less than significant.				
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>18g. Response:</b> (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)  <b>No Impact.</b> The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50% of all solid waste generated by January 1, 2000. In 2015, the City is had achieved a 60% diversion rate, well above State requirements. This achievement has earned the City recognition as a “Model City for Local Government Recycling and Waste Reduction.” With continued implementation of the city’s recycling and clean-up programs, such as C.U.R.E (Clean Up Riverside’s Environment), compliance with federal, state, and local statues and regulations related to solid waste will be achieved by the proposed project. Therefore, no impacts related to solid waste statues will occur directly, indirectly or cumulatively.				

<b>19. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>19a. Response:</b> (Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area)</p> <p><b>Less Than Significant Impact.</b>  <u>Biological Resources</u>  As stated in the Biological Resources discussion, the subject site is a previously developed and disturbed site located within an urban neighborhood which diminishes the potential for the occurrence of sensitive biological resources. Development of the proposed project would thus result in less than significant impact to biological resources.</p> <p><u>Cultural Resources</u>  No archaeological, historic, or paleontological resources have been identified onsite. Three tribes have requested consultation with the City on the proposed project. The City will incorporate recommendations or mitigation measures into the final Initial Study prior to completion of the document and approval of the project.</p>				
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>19b. Response:</b> (Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)</p> <p><b>Less Than Significant Impact.</b> The proposed project will contribute to the cumulative impacts of development in the City and broader Inland Empire since the project is requesting a General Plan Amendment and a Change of Zone which will increase the intensity of development currently allowed under the General Plan 2025. This increased impact will affect traffic as explained in Section 16, Traffic/Transportation. In order to reduce these impacts Mitigation Measures 16-1 through 16-6 will be required. Once these measures are implemented the impacts to traffic as a result of the proposed project will be reduced to less than significant levels, and cumulative impacts associated with build out of the General Plan will also be less than significant.</p>				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>19c. Response:</b> (Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)</p> <p><b>Less Than Significant Impact.</b> The proposed project will not significantly impact human beings. The project is small scale, will add only 14 additional housing units to the area, and will not result in exceeded thresholds of significance relating to air quality, noise, public facilities, hazards and hazardous materials or transportation. Based on the analysis and conclusions in this initial study, the project will not cause substantial adverse effects, directly or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed project are less than significant.</p>				

***Staff Recommended Mitigation Measures***

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>3</sup>	Monitoring/Reporting Method
<b>Transportation</b>	<b>MM Trans 16-1:</b> An extension of the striped median on Chicago Avenue shall be provided from its current location south of 7 <sup>th</sup> Street to the project's northern boundary. On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the project.	Prior to Final Occupancy	Planning Division Public Works Department	Compliance with Project Conditions of Approval. Approval of Off-Site Improvement Plans. Issuance of a Certificate of Occupancy.

---

<sup>3</sup> All agencies are City of Riverside Departments/Divisions unless otherwise noted.  
Environmental Initial Study