



The Exchange Project

Draft Environmental Impact Report

SCH#2018071058

prepared by

City of Riverside

Planning Division, Community Development Department

3900 Main Street, 3rd Floor

Riverside, California 92501

Contact: Brian Norton, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.

2215 Faraday Ave, Suite A

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Acronyms and Abbreviations

AB	(California) Assembly Bill
ADA	Americans with Disabilities Act
ADRP	Archeological data recovery program
ADT	Average daily traffic
AF	acre feet
AFY	acre feet per year
AJD	Approved jurisdictional determination
ALUCP	airport land use compatibility plan
amsl	above mean sea level
APCD	air pollution control district
APE	area of potential effect
APN	Assessor's Parcel Number
APS	alternate planning strategy
APTA	American Public Transportation Association
APZ	agricultural protection zone
AQMD	air quality management district
BAAQMD	Bay Area Air Quality Management District
Basin	South Coast Air Basin
BCE	before the common era
BFE	base flood elevation
bgs	below ground surface
BMP	best management practices
BP	year(s) before the present
btu	British thermal unit
°C	degree(s) Celsius
CAA	Clean Air Act

CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGreen	California Green Building Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution control Officers Association
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CAT	Climate Action Team
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFC	Chlorofluorocarbons
CFGF	California Fish and Game Code
CFGF	California Fish and Game Code
CGS	California Geological Survey
CH ₄	Methane
CNG	Compressed Natural Gas
CNPS	California Native Plant Society
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalents
CPUC	California Public Utilities Commission
CRAM	California Rapid Assessment Method

CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agencies
CWA	Clean Water Act
cy	cubic yards
dB	decibel
dBA	A-weighted decibel
DOC	(California) Department of Conservation
DOE	(U.S.) Department of Energy
DOF	California Department of Finance
DOGGR	(California) Division of Oil, Gas, and Geothermal Resources
DP	Development Plan
DPM	diesel particulate matter
DWR	California Department of Water Resources
EA	environmental assessment
EAP	(California) Energy Action Plan
ECOS	Environmental Conservation Online System (USFWS database)
EDR	Environmental Data Resources
EIA	(U.S.) Energy Information Administration
EIR	Environmental Impact Report
EO	(California) Executive Order
°F	degree(s) Fahrenheit
FAR	floor-area ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
GHG	greenhouse gas
GHz	gigahertz
GIS	geographic information system
gpd	gallons per day
gpm	gallons per minute
GPS	global position system

GWh	gigawatt-hour
GWP	global warming potential
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbons
HRA	Health Risk Assessment
HU	Hydrologic Unit
HVAC	Heating, ventilation, and cooling
I-215	Interstate 215
Interchange	the Riverside Interchange (of SR 60 and I-215)
IPCC	International Panel on Climate Change
kW	kilowatt
Ldn	Day-night average sound level
LEED	Leadership in Energy and Environmental Design
Leq	Equivalent noise level
LID	Low Impact Development
Lmax	Maximum sound level
Lmin	Minimum sound level
LOP	Level of protection
LOS	Level of service
LST	Localized Significance Thresholds
LUST	Leaking Underground Storage Tank
MBtu	Millions Btu
MCL	Maximum Contaminant Levels
mgd	million gallons per day
mpg	miles per gallon
MS4	municipal separate storm sewer system
MSHCP	Multiple Species Habitat Conservation Plan
MSL	mean sea level
Mthm	million (U.S.) therms
NAAQS	National Ambient Air Quality Standards

NAHC	Native American Heritage Commission
NMFS	National Marine Fisheries Service
NO	Nitric oxides
NO ₂	Nitrogen dioxide
NOC	Notice of
NOD	Notice of Determination
NOP	Notice of Preparation
NO _x	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O ₃	Ozone
OA	Old Agoura Overlay
OHWM	Ordinary High Water Mark
PFC	perfluorocarbons
PM	particulate matter
PM ₁₀	particulate matter between 2.5 and 10 micrometers diameter
PM _{2.5}	particulate matter less than 2.5 micrometers diameter
ppm	parts per million
PRC	[California] Public Resources Code
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCIP	Riverside County Integrated Project
RCP	reinforced concrete pipe
RCTC	Riverside County Transportation Commission
RMC	Riverside Municipal Code
ROG	reactive organic gas
ROW	right-of-way
RPR	Rare Plant Rank
RPR	Rare Plant Rank
RPS	Renewable Standard Portfolio
RPU	Riverside Public Utilities
RRG-CAP	Riverside Restorative Growthprint-Climate Action Plan

RTA	Riverside Transit Authority
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RTPA	Regional Transportation Planning Agency
RUSD	Riverside Unified School District
RV	Recreational vehicle
RWQCB	Regional Water Quality Control Board
SAF Plan	State Alternative Fuels Plan
SARWQCB	Santa Ana Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
sf	square foot/feet
SoCalGas	Southern California Gas Company
SoCalGas	Southern California Gas Company
SO _x	Sulfur oxide
SR	State Route
SRA	source receptor area
SSC	Species of Special Concern
ST	State Threatened
STC	sound transmission class
SWP	(California) State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
thm	(U.S.) therms
TIA	Traffic Impact Assessment
TMDL	Total Maximum Daily Load
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture

USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Service
VOC	Volatile Organic Compound
WDR	Waste Discharge Requirements
WMWD	Western Municipal Water District
WoS	Waters of the State
WoUS	Waters of the United States
WQCB	Water Quality Control Board
WQMP	Water Quality Management Plan
WQS	Water Quality Standards

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of The Exchange Project (project). This section summarizes the characteristics of the project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Project Synopsis

Project Applicant

AFG Development, LLC
1451 Research Park Drive, Suite 200
Riverside, California 92507

Lead Agency Contact Person

Brian Norton, Senior Planner
City of Riverside
Planning Division, Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92552
951-826-2308

Project Description

This EIR has been prepared to examine the potential environmental effects of The Exchange project. The following is a summary of the full project description provided in Section 2.0, Project Description. The approximately 35.4-acre project site is located in the northwestern section of the City of Riverside, and is bounded generally by Orange Street to the west, Strong Street to the north, State Route (SR) 60 to the south and Interstate 215 (I-215) to the east. The project site comprises seven parcels with the following parcel numbers: 209-151-029, 209-151-036, 209-020-022, 209-020-047, 209-020-048, 209-020-059, 209-020-060, 209-020-061, 209-020-062, 209-060-023, 209-060-027, 209-060-029, and 209-070-015. The project site is undeveloped except for a concrete storm drain that traverses the center. Remnant foundational materials from previously demolished residences are also found on the site.

A number of land use designations and zoned districts regulate the site. These include General Plan Land Use designations of O – Office and MDR – Medium Density Residential and Zoning designations of R-1-7000 – Single Family Residential, R-3-1500 – Multiple Family Residential, and R-1-7000-WC – Single Family Residential and Water Course Overlay.

Project Characteristics

The proposed mixed-use project would consist of multi-family residential dwelling units, multi-tenant commercial buildings, a vehicle fueling station, a drive-thru restaurant, two hotels, recreational vehicle overnight parking (RV parking), and space for intermittent outdoor

entertainment and on-site activities (e.g., farmers market, car shows). A description of each project component follows.

RESIDENTIAL

The residential component of the proposed project would be located on approximately 18.4 acres, on the northern portion of the site and would have three gated entry points. The project would include 482 one-, two-, and three-bedroom, multi-family residential units in 21 three-story buildings with a density of 26.2 dwelling units per acre. Of the 482 units; 157 residential units would be one-bedroom, one-bathroom, ranging from 710 to 796 square feet (sf). Ten of the one-bedroom, one-bathroom units would be dedicated as live/work units. Another 308 residential units would be two-bedroom, two-bathroom, ranging in size from 1,015 to 1,159 sf. The remaining 17 residential units would be three-bedroom, two-bathroom, and approximately 1,297 sf in size. The average unit size would be 995 sf.

COMMERCIAL

The commercial component of the proposed project would include 49,000 sf of leasable commercial space in eight buildings, on approximately 7.6 acres, primarily on the southwest portion of the site. Four of the commercial buildings would be divided into four multi-tenant buildings, with two to four tenants each. Two larger, multi-tenant buildings would be able to accommodate up to eight tenants. Two stand-alone buildings would allow for a drive-thru restaurant and fueling station with a convenience store with quick-serve restaurant and drive-thru carwash.

HOTEL AND RV PARKING

The hotel component totals approximately 130,000 sf in area and consists of two buildings, on approximately 7.4 acres of the project site. Combined, the hotels contain 229 rooms, and each building is proposed at four stories in height. The hotels would be fully separate entities; owned and operated by different companies with independent amenities. Hotel 1 would be approximately 70,000 sf and contain 120 rooms. Hotel 2 would be approximately 60,000 sf and contain 109 rooms. Each hotel would have a pool for visitor use.

The proposed project would include short-term RV parking on the southeast portion of the project site, south of Hotel 2. The RV parking would provide 23 RV spaces, with room to accommodate one standard RV and a personal vehicle at each space, and 12 automobile parking spaces for visitor use. Each RV parking space would be equipped with water, gas, sewer, and electrical hookups.

FARMERS MARKET, LIVE ENTERTAINMENT, AND SPECIAL EVENTS

The project includes provisions for spaces for a farmers market, live entertainment, and special events to serve the proposed residences and surrounding community. The farmers market would occur on weekends from morning until early afternoon. Live entertainment would be situated in the center courtyard of the commercial buildings. The events would occur occasionally, on Friday, Saturday, and/or Sunday, and would have the condition to comply with the City's Noise Ordinance as part of the permit issuance process. Special events would vary throughout the year and would occur in the southern parking lot area, south of Building Shop 1 and Shop 2.

Green Building Features

A number of green building features are proposed, including on-demand hot water systems, efficient HVAC systems, LED lighting, and individual unit water-use monitoring. Each residential unit

would be wired for a future electric vehicle (EV) charging station. A ride-sharing pick-up point is proposed for residents and people visiting the site to encourage ride-sharing, simplify pick-up and drop-off, and reduce traffic hazards. A package delivery concierge service, with package lockers, would be provided as part of the proposed residential development. This would create a one-stop pick-up and drop-off location for packages, reducing the need for idling delivery trucks throughout the residential development. Lighting for the project would consist of low-energy, LED lights and would comply with City's lighting standards. Proposed green building features are discussed further in Section 4.5, *Energy Conservation*.

Landscaping and Open Space

RESIDENTIAL

Private and common open areas for the residential component of the project are provided in accordance with City's Zoning Code. The proposed project includes 55 to 133 sf of private outdoor space for each dwelling unit (averaging 102 sf) in the form of patios or balconies, totaling 48,985 sf for all units combined. The project would provide 71,240 sf of common outdoor space, equating to 148 sf per dwelling unit. The common open space areas would include low-water landscaping, pools with barbeque areas, seating, and decks, and lawn/turf areas for outdoor activities, gathering spaces, and an approximately 13,000-sf dog park and two clubhouses.

COMMERCIAL

Common space throughout the commercial and hotel portions of the development would include connected courtyards and public gathering areas with seating and dining tables. Landscaping throughout the project site would consist of California native, low water use trees, shrubs, and ground cover, and various planted accent pots, detailed in the project plans in Appendix M. The design includes decorative crosswalks, paving, and seating furniture for the commercial and residential areas.

Freeway Signage

The project would include two pylon signs, with a maximum height of 60 feet from the grade of the adjacent freeway, installed near SR 60 on the south side of the site and along the SR 60/I-215 interchange ramp. The height of the sign along SR 60 could be up to approximately 49.3 feet, and the height of the sign along I-215 could be approximately 70.8 feet. Individual business names would be backlit in a 25-foot tall portion of the top part of the pylon that would be visible to drivers on the freeways. There would be space for six businesses to advertise on each sign.

Parking, Site Access, and On-site Circulation

A total of 1,587 parking spaces would be provided for the entire proposed project site. The residential component includes 886 spaces; the commercial component includes 400 spaces shared among retail and restaurant uses; 301 spaces at the hotel and RV parking components.

Primary vehicular access to the project site would be provided via a driveway on the western boundary of the site on Orange Street. Future residents would access the site from entrances on La Cadena Drive and the northern-most driveway along Orange Street. Three gate-controlled entrances within the project site would secure the residential component of the project. Commercial patrons and hotel and RV parking visitors would access the site by the driveways along Orange Street.

The main circulation flow would be from a private central roadway, extending from Orange Street to La Cadena Drive. This would be the primary vehicular travel route to access the commercial or residential areas, with a four-way intersection at the center of the site. The majority of the existing concrete-lined channel that traverses the site would be covered by the central roadway and parking spaces.

Utilities

Riverside Public Utilities would provide electric and water utility services to the proposed project site. The City's Public Works Department would provide wastewater services. SoCalGas would provide gas service and either the City or a private contractor would provide solid waste disposal. Utility services are discussed in Section 4.14, *Utilities and Service Systems*.

Off-site Improvements

The project would include various off-site construction activities and improvements necessary for its implementation. Grading in the Caltrans right-of-way would occur during site preparation, as would improvements to the Orange Street off-ramp. The work within the Caltrans right-of-way would be subject to Caltrans permitting and environmental review processes. Various other traffic measures would also require off-site improvements, including installation of traffic signals, restriping lanes, and providing turn lanes at intersections around the project site.

Construction and Grading

Construction of the proposed project is expected to occur over approximately two years. Construction activity would comply with the City's Municipal Code Section 7.35.020 and would not operate between the hours of 7:00 PM and 7:00 AM on weekdays, between the hours of 5:00 PM and 8:00 AM on Saturday, or anytime on Sunday. Construction activity would consist of phased site preparation and grading, building construction, architectural coating, and paving. The concrete-lined channel that bisects the site would need to be covered to provide easy access to the southern and northern portions of the project site during grading and construction. Therefore, the first phase of site preparation and grading would include the removal of the open concrete channel and the installation of a minimum 98-inch reinforced concrete pipe to reroute the water under the proposed primary roadway. Once the channel is covered, the remainder of the site could be cleared and graded.

Based on the project site's existing topography, grading would require a maximum cut and/or fill of approximately 20 feet. The soils investigation anticipated shrinkage of 10 percent and subsidence of 0.1 foot. Coupled with the loss of soil due to stripping of vegetation, removal of existing asphalt/concrete and export of other deleterious material, the soil is anticipated to balance on the site. Various retaining walls, up to 12 feet, would be constructed around the perimeter of the development. A grading exception is being requested as part of the proposed project to allow the retaining walls to exceed 6 feet in height. The second phase of site preparation and grading activity would include establishing building pads and preparing for building construction. Construction equipment for the project would include tractors, bulldozers, graders, and scrapers for the site preparation and grading, and cranes, forklifts, welders, rollers, and other paving equipment for building construction and paving.

Project Objectives

The proposed project intends to achieve the following objectives:

- Increase the type and amount of housing available consistent with the goals of the City's Housing Element
- Increase the number of hotel rooms in the City
- Respond to a growing need of RV parking for short-term visitors
- Provide amenities for the surrounding neighborhood in the form of a commercial center with provisions for a farmers market, live entertainment, and special events
- Use land resources more efficiently by providing a well-planned, infill development on a currently vacant site
- Create a mixed-use development consistent with the City's Smart Growth principles
- Increase commercial, retail, and restaurant space in the City

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following four alternatives. Based on the alternatives analysis, Alternative 1 was determined to be the environmentally superior alternative.

- Alternative 1: No Project
- Alternative 2: Develop the Site Pursuant to Current Underlying Zoning Regulations
- Alternative 3: Mixed-Use Development with Lower Residential Density
- Alternative 4: No Riverside County Flood Control and Water Conservation District Lease Area Development

Alternative 1 (No Project) assumes that the proposed 482 residential units, 49,000 sf of commercial space, two hotels, RV parking, and associated roadways and parking lots are not constructed. The current undeveloped site would remain undeveloped, and the existing concrete channel wash would remain uncovered. The No Project alternative would not fulfill any of the project's objectives because the existing site would not provide housing, increase the number of hotel rooms in the City, respond to a growing need for RV parking spaces, provide amenities to the surrounding community, or create a mixed use, infill development. Impacts under the No Project alternative would be less than impacts under the proposed project

Alternative 2 (Develop the Site Pursuant to Current Underlying Zoning Regulations) analyzes development of the site in accordance with the current land use and zoning designations. A number of land use designations and zoning districts regulate the site. These include General Plan Land Use designations of O – Office and MDR – Medium Density Residential and Zoning designations of R-1-7000 – Single Family Residential, R-3-1500 – Multiple Family Residential, and R-1-7000-WC – Single Family Residential and Water Course Overlay. The current project is proposing a General Plan and Zoning Code Amendment in order to amend the land use designation and zone of the site to a Mixed Use Urban and Commercial land use and Mixed Use Urban and Commercial Retail zoning designation. This change would allow the desired increase in residential density, commercial development, two hotels, visitor-serving mixed uses, farmers market, and outdoor entertainment.

Development under Alternative 2 would allow primarily single-family development with some multi-family. The underlying zoning would allow for 6.2 single-family residences per acre in the R-1-7000 zone and 29 multi-family residences (apartments or condominiums) per acre in the R-3-1500 zone. Therefore, development under Alternative 2 could yield up to 173 single-family residences and an 87 unit multi-family residential development. Approximately 4 acres of the site would still be undevelopable due to the Riverside County Transportation Commission easement that could remain vacant or be converted to open space. The only proposed project objective satisfied under this alternative would be increasing the type and amount of housing available in the City. Of the alternatives evaluated in this EIR, Alternative 2 is determined to be the environmentally superior alternative.

Alternative 3 (Mixed Use Development with Low Density Residential) would not alter the current site plan or mix of uses proposed on the project site. The residential uses would be located on the northern area of the site and commercial and visitor-serving uses would be located to the south and east. The circulation and traffic flow on-site would also remain the same. The commercial uses, hotels, and RV parking areas would also remain the same relative to use, size, massing, and layout. General Plan and Zoning Code Amendments would still be required under Alternative 3 to allow mixed-use development.

The residential portion of the project under Alternative 3 would remain in the same location but be reduced in density for consistency with density allowed in the R-1-7000 Single-Family Residential Zone. The proposed project proposes a residential density of 26.2 units per acres. Under Alternative 3, a density of 6.2 units per acre would be provided. The residentially zoned portion of the site consists of approximately 18.4 acres. Under this alternative, 114 residential units would be allocated. This would constitute a reduction in 368 units from the currently proposed 482 units. This Alternative maintains the existing layout of the project, with residential uses to the north and commercial and visitor-serving uses to the south and east. This alternative still meets the objectives of the proposed project, but would not reduce the significant and unavoidable impacts to air quality and greenhouse gas emissions.

Alternative 4 (No Riverside County Transportation Commission Lease Area Development) would remove the development area on the Riverside County Transportation Commission leased land, which totals approximately 4.34 acres. This alternative would remove the proposed RV Parking portion as well as parking area for the hotels. Due to the reduction in parking spaces, Alternative 4 would have only one hotel. The remaining site plan, circulation, and traffic flow would remain the same as under the proposed project. Alternative 4 would consist of 482 residential units, 49,000 sf of leasable commercial space, and one hotel. General Plan and Zoning Code Amendments would still be required under Alternative 4 to allow the mixed use development. This alternative would meet all of the project objectives except for responding to the growing need for RV parking in the City. Similar to Alternative 3, this alternative would have significant and unavoidable impacts to air quality and greenhouse gas emissions.

Refer to Section 6.0, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The City of Riverside circulated an Initial Study and a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on July 25, 2018 and ending on August 24, 2018. The City distributed the NOP to the State Clearinghouse, responsible agencies, and other interested parties. The City held an EIR Public Scoping Meeting on August 2, 2018, aimed at providing

information about the proposed project and the CEQA process to members of public agencies, interested stakeholders, and residents/community members.

In addition to verbal comments from members of the public during the Public Scoping Meeting, the City received one email from a resident, two letters from community groups, three comment cards from the Public Scoping Meeting, and three letters from public agencies. Appendices A and B of this EIR present the Initial Study, the NOP, and all comments received during the 30-day review period. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the City are summarized in Section 1.0, *Introduction*.

Primary areas of concern include the following:

- Health risk associated with the project's proximity to two major freeways
- Compliance with tribal outreach and consultation
- Impacts to the neighboring elementary school
- Project alternatives
- The aesthetic quality of the project
- Increased traffic congestion and changes to circulation patterns
- Changes to drainage patterns
- increased strain on the City's park system
- Light and noise impacts to neighboring homes
- privacy issues
- temporary noise and dust from construction
- Inclusion of energy efficiency measures
- Changes in the site topography
- Impacts to biological resources

Written and verbal comments from agencies and interested parties in response to the NOP are summarized in Table ES-1, which summarizes the comments and details where each is addressed in the EIR.

Issues Not Studied in Detail in the EIR

The Initial Study (Appendix A) determined no substantial evidence exists that significant impacts would occur with regards to the following issue areas: Agricultural Resources, Hazards and Hazardous Materials, Mineral Resources, Population and Housing, and Public Services. Section 4.15, Impacts Found to be Less than Significant, summarizes the issues determined to have no impact and issues from the environmental checklist determined to be less than significant in the Initial Study.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a

Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.

- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure(s)	Residual Impact
Aesthetics		
Impact AES-1. Development of the project would alter the visual character of the vacant subject site by introducing a cluster of multi-story buildings that differ from the suburban, industrial, and commercial forms on adjacent parcels. While the change would be substantial, the existing visual character and quality of the site and its surroundings would not be substantially degraded because of project implementation. The proposed buildings and landscaping would adhere to the City's design guidelines and contribute to the city policies related to aesthetics, bringing about an improvement to existing unmaintained parcels. Impacts would be less than significant.	None required	Less than Significant
Impact AES-2. The project would introduce new lighting and glare to the area. The addition of commercial and residential properties would generate vehicle use and associated light and glare, along with street and security lights, and light emitted from buildings and signage. However, the project would be required to follow the performance standards in the City zoning code that regulate lighting to avoid light and glare impacts, including those that prevent light spillage onto the surrounding properties. Impacts would be less than significant.	None required	Less than Significant
Air Quality		
Impact AQ-1. The proposed project would generate new housing and employment opportunities that could contribute to additional population growth. The anticipated increase in population would	Implementation of mitigation measures AQ-3 and AQ-4 would reduce operational NO _x emission impacts to the maximum extent feasible by incorporating additional conservation measures and ensuring compliance with CalGreen and Title 24	Significant and Unavoidable A Statement of Overriding Consideration is

Impact	Mitigation Measure(s)	Residual Impact
not exceed growth forecasts used in the development of the Air Quality Management Plan (AQMP). However, the project would generate NO _x emissions that exceed thresholds and could result in an increase in air quality violations, which would conflict with the AQMP. Because there are no feasible mitigation measures to reduce NO _x emissions, the project could conflict with implementation of the AQMP and impacts would be significant and unavoidable.	requirements.	required prior to project approval
Impact AQ-2. Construction of the proposed project would result in the temporary generation of air pollutants that would affect local air quality. Mitigation would be required to reduce short-term emissions of ROG during the construction phase and reduce maximum daily emissions of PM10 and PM2.5 during site preparation. This impact is less than significant with mitigation.	AQ-1 Super Compliant Low VOC Paints. During the architectural coating phase of construction, the project shall utilize “Super-Compliant” low VOC paints formulated to exceed the regulatory VOC limits put forth by SCAQMD Rule 1113. Super-Compliant low VOC paints shall contain no more than 10 grams of VOC per liter. Alternatively, the applicant may utilize tilt-up concrete panels that do not require architectural coatings. AQ-2 Site Preparation and Grading Watering. During site preparation and grading activity phases of construction, all actively graded areas shall be watered at two-hour watering intervals (i.e., four times per day) or a movable sprinkler system shall be in place to ensure a minimum soil moisture of 12 percent is maintained. Moisture content shall be verified with the use of a moisture probe by the grading contractor four times per day during grading activities.	Less than Significant
Impact AQ-3. Operational emissions from the project would exceed SCAQMD thresholds for NO _x from mobile sources. Implementation of mitigation measures AQ-3 and AQ-4 would reduce impacts to the maximum extent feasible. Since no feasible mitigation measures exist to control tailpipe emissions, impacts would be significant and unavoidable.	AQ-3 Exceedance of California Building Code Title 24. Prior to the issuance of building permits, the project applicant shall submit energy usage calculations to the City of Riverside Building Division showing that the project is designed to achieve a minimum five percent efficiency beyond the existing California Building Code Title 24 and Building and Safety Requirements. Examples of measures that reduce energy consumption include, but are not limited to, the following: <ul style="list-style-type: none">▪ Increase in insulation such that heat transfer and thermal bridging is minimized▪ Limit air leakage through the structure and/or within the heating and cooling distribution system▪ Use energy-efficient space heating and cooling equipment▪ Install electrical hook-ups at loading dock areas▪ Install dual-paned or other energy efficient windows▪ Use interior and exterior energy efficient lighting that exceeds current California Title 24 Energy Efficiency performance standards	Significant and Unavoidable A Statement of Overriding Consideration is required prior to project approval

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> ▪ Install automatic devices to turn off lights where they are not needed ▪ Apply a paint and surface color palette that emphasizes light and off-white colors to reflect heat away from buildings ▪ Design buildings with “cool roofs” using products certified by the Cool Roof Rating Council, and/or exposed roof surface using light off-white colors ▪ Design buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems ▪ Install ENERGY STAR-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting product <p>The items listed above are not all required, but present examples of efficiency measures. Neither is the list all-inclusive; other features that reduce energy consumption could be acceptable at the discretion of the City Building Official.</p> <p>AQ-4 Enhanced Water Conservation. Prior to the issuance of building permits, the project applicant shall prepare a Water Conservation Strategy and demonstrate a minimum 30 percent reduction in outdoor water use compared to baseline water demand. Baseline water demand is the total expected water demand without implementation of the Water Conservation Strategy. The project Water Conservation Strategy shall be subject to review and approval by the City. The project shall also implement the following:</p> <ul style="list-style-type: none"> ▪ Install a landscaping palette emphasizing drought tolerant plants ▪ Use water-efficient irrigation techniques ▪ Implement USEPA Certified WaterSense labeled or equivalent faucets, high-efficiency toilets, and water-conserving shower heads 	
Impact AQ-4. Although the project would increase traffic along local roadways, increased project-related traffic would not result in the creation of CO hotspots; neither would the project result in a cumulatively considerable increase of criteria pollutants, including those designated non-attainment. Impacts would be less than significant.	None Required	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact AQ-5. The project would expose surrounding sensitive receptors to construction dust and toxic air contaminants, and would expose sensitive receptors to TACs from adjacent freeways. However, construction emissions and TACs would not exceed SCAQMD thresholds and impacts would be less than significant.	None Required	Less than Significant
Impact AQ-6. The proposed project does not contain land uses that are associated with odor complaints and impacts would be less than significant.	None Required	Less than Significant
Biological Resources		
Impact BIO-1. Implementation of the project could result in direct or indirect impacts to Burrowing Owl through removal of ground cover and habitat, and from construction during the breeding season. Impacts would be less than significant with mitigation incorporated.	<p>BIO-1a Burrowing Owl Preconstruction Survey. Pre-construction presence/absence surveys for burrowing owl shall be conducted in the survey area where suitable habitat is present prior to ground disturbance in new areas, throughout the construction phase of the project. Pre-construction surveys shall be conducted by a qualified biologist in the development footprint and a 500-foot buffer no more than 30 days prior to grading or other significant site disturbance. The surveys should be conducted in accordance with the most recent CDFW and California Burrowing Owl Consortium guidelines. A burrow shall be considered occupied when there is confirmed use by burrowing owl based on observations made by a qualified biologist. If owls are not found to be occupying habitat in the survey area during the pre-construction survey, the proposed disturbance activities may proceed. Take of active nests shall be avoided.</p> <p>BIO-1b Burrowing Owl Avoidance Measures. If owls are discovered on and/or within 500 feet of the proposed project site, avoidance measures shall be developed in compliance with the MSHCP and in coordination with the CDFW and/or Western Riverside County Regional Conservation Authority. Such measures will include but not be limited to the following:</p> <ul style="list-style-type: none"> ▪ Burrowing owls shall not be disturbed on-site and/or within a 500-foot buffer between February 1 and August 31 to avoid impacting nesting. ▪ Prior to any ground disturbance, all limits of project construction shall be delineated and marked to be clearly visible to personnel on foot and in heavy equipment. All construction-related activities shall occur inside the limits of construction and designated staging areas. Construction staging and equipment storage shall be located outside of any occupied burrowing owl burrow locations. All 	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
	<p>construction-related movement shall be restricted to the limits of construction and staging areas.</p> <ul style="list-style-type: none"> Avoidance measures shall include passive relocation by a qualified biologist to remove the owls between September 1 and January 31, which is outside of the typical nesting season. 	
<p>Impact BIO-2. Implementation of the project could result in direct or indirect impacts to nesting birds and raptors through removal of trees and vegetation that serve as nesting habitat. Impacts would be less than significant with mitigation incorporated.</p>	<p>BIO-2 Nesting Bird Avoidance. Prior to issuance of grading permits, the following measures shall be implemented:</p> <p>To avoid disturbance of nesting and special-status birds such as Cooper’s hawk, and including other raptorial species protected by the Migratory Bird Treated Act and CFGC, activities related to the project, including but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 30). If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than 30 days prior to initiation of construction activities. The nesting bird pre-construction survey shall be conducted on foot inside the project site disturbance areas, and including a 500-foot buffer. Inaccessible areas (e.g., private lands) will be surveyed from afar using binoculars to the extent practical. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in western Riverside County. If nests are found, an appropriate avoidance buffer will be determined by a qualified biologist and demarcated by a qualified biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. Effective buffer distances are highly variable and based on specific project stage, bird species, stage of nesting cycle, work type, and the tolerance of a particular bird pair. The buffer may be up to 500 feet in diameter, depending on the species of nesting bird found and the biologist’s observations.</p> <p>If nesting birds are located adjacent to the project site with the potential to be affected by construction activity noise above 60 dBA Leq (see Section 4.10, Noise, for definitions and discussion of noise levels), a temporary noise barrier would be erected. The barrier would consist of large panels designed specifically to be deployed on construction sites for reducing noise levels at sensitive receptors. If 60 dBA Leq is exceeded, an acoustician would require the construction contractor to make operational and barrier changes to reduce noise levels to 60 dBA during the breeding season (February 1 through August 30). Noise monitoring shall occur during operational changes and installation of barriers to ensure their effectiveness.</p>	<p>Less than Significant</p>

Impact	Mitigation Measure(s)	Residual Impact
	<p>All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No parking, storage of materials, or construction activities shall occur within this buffer until the avian biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist, if it is determined such encroachment will not adversely impact the nesting birds.</p>	
<p>Impact BIO-3. The project proposes to permanently develop over a concrete-lined channel and a soft-bottom drainage that contain habitat the CDFW and RWQCB consider sensitive. Impacts to the concrete-lined channel and the soft-bottom drainage would result in adverse impacts to riparian habitat. Impacts would be less than significant with mitigation incorporated.</p>	<p>BIO-3 Avoidance and Minimization. Jurisdictional areas outside the footprint of direct development impact (i.e., the eastern portion of the concrete channel) shall be avoided. Any material/spoils generated from project activities shall be located away from jurisdictional areas and protected from stormwater run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. Any material spills will be stopped if this can be done safely. The contaminated area will be cleaned and any contaminated materials properly disposed. For all spills, the project foreman will be notified.</p> <p>BIO-4 Consultation and Compensatory Mitigation. Prior to ground disturbance activities that will impact waters and WoUS and/or WOS, the project proponent shall consult with USACE on the need for a CWA Section 404 permit, the RWQCB regarding compliance with Section 401 of the CWA, CDFW on the need for a Streambed Alteration Agreement, and the Western Riverside Conservation Authority, which oversees compliance with the MSCHP. Discussions with these agencies were initiated in October 2018 and are ongoing. Appropriate permits shall be obtained prior to disturbance of jurisdictional resources. Impacts to jurisdictional waters shall be mitigated through the purchase of the appropriate number of riparian/riverine restoration credits from the nearby Riverside-Corona Resource Conservation District. These impacts will be mitigated at no less than a 1:1 ratio.</p>	<p>Less than Significant</p>
<p>Impact BIO-4. Construction of the project would permanently impact 0.36 acre of non-wetland WoUS, protected under the CWA. Impacts would be less than significant with mitigation incorporated.</p>	<p>Implementation of Mitigation Measures BIO-3 and BIO-4 would require the project to avoid impacts to jurisdictional features to the extent feasible, to consult with applicable agencies to obtain appropriate permits prior to ground-disturbing activities, and to purchase riparian/riverine restoration credits for impacts to jurisdictional waters at no less than a 1:1 ratio.</p>	<p>Less than Significant</p>

Impact	Mitigation Measure(s)	Residual Impact
Impact BIO-5. No proposed or existing MSHCP core areas, linkages, or habitat blocks are on or near the project site. There would be no impact.	None Required	No Impact
Impact BIO-6. The Project is located in the MSHCP plan area and will be required to conduct pre-construction surveys for burrowing owl and to pay an MSHCP development mitigation fee to reduce potential impacts. The project site also contains two drainage features under jurisdiction of USACE, CDFW, and RWQCB. Implementation of mitigation measures would reduce impacts to less than significant with mitigation incorporated.	Implementation of mitigation measures BIO-3 and BIO-4 would reduce potential impacts to riparian/riverine resources to a less than significant level by avoiding impacts to jurisdictional features to the extent feasible and ensuring there is no net-loss to these resources. This would reduce potential conflicts with the adopted MSHCP to less than significant.	Less than Significant
Cultural Resources		
Impact CR-1. No known archaeological resources are present on the project site. However, construction of the project would involve ground-disturbing activities, such as grading and surface excavation, with the potential to unearth or adversely impact previously unidentified archaeological resources. Therefore, the project would result in less than significant impacts with mitigation incorporated.	<p>CR-1 Archaeological Monitoring Plan. At least 30 days prior to issuance of grading permit and before any grading, excavation, and/or ground disturbing activities take place, the developer shall retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983), to carry out all mitigation measures related to archaeological and historic resources.</p> <p>The project archaeologist, in consultation with consulting tribes, the developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include:</p> <ul style="list-style-type: none"> ▪ Project grading and development scheduling ▪ A rotating or simultaneous schedule in coordination with the developer and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists ▪ Protocols and stipulations that the developer, tribes, and project archaeologist/ paleontologist shall follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or non-renewable paleontological resources that shall be subject to a cultural resources evaluation ▪ Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site ▪ The scheduling and timing of the Cultural and 	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
	<p>Archaeological Sensitivity Training noted in mitigation measure CR-2.</p> <p>CR-2 Cultural and Archaeological Sensitivity Training. A qualified archaeologist and any consulting tribes shall attend the pre-grading meeting with the developer’s contractors to conduct a Worker’s Environmental Awareness Program training for cultural and archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. Archaeological sensitivity training shall include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, procedures to follow during ground disturbance in sensitive areas, and protocols in the event unanticipated resources are discovered. Only construction personnel who received this training can conduct construction and disturbance activities in sensitive areas. All attendees shall confirm attendance by signing a sign-in sheet to be submitted to the City of Riverside.</p> <p>CR-3 Treatment and Disposition of Cultural Resources. In the event cultural resources are encountered inadvertently during ground-disturbing activities, work in the immediate area must halt and the qualified archaeologist must be immediately contacted and may consult with the tribal monitor(s) to evaluate the find and develop a plan for treatment of the find/archaeological site. The following procedures shall be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none">1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site shall need to be inventoried thoroughly with tribal monitor oversight, as necessary, of the process.2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains, as part of the required mitigation for impacts to cultural resources. The landowner(s) shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:<ul style="list-style-type: none">▪ Accommodate the process for on-site reburial of the discovered items with the consulting tribes. This shall include measures and provisions to protect the future reburial	

Impact	Mitigation Measure(s)	Residual Impact
	<p>area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation are completed.</p> <ul style="list-style-type: none"> Secure a curation agreement with an appropriate qualified repository in Riverside County that meets federal standards per 36 CFR Part 79 and will professionally curate and make available findings to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility in Riverside County, to be accompanied by payment of the fees necessary for permanent curation. If more than one consulting tribe is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors, as necessary, within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced shall be submitted to the City of Riverside, Eastern Information Center, and consulting tribes. 	
<p>Impact CR-2. No known paleontological resources or human remains are present on the project site. However, construction of the project would involve ground-disturbing activities such as grading and surface excavation, which have the potential to unearth or adversely impact previously unidentified paleontological resources or human remains. Therefore, the project would result in Less Than Significant Impacts with Mitigation Incorporated.</p>	<p>CR-4 Paleontological Resources Monitoring. The following mitigation measure would address the potentially significant impacts relating to the discovery of paleontological resources during project implementation and ground-disturbing activities. This measure would apply to all phases of project construction and would ensure that any significant fossils present on-site are preserved. The following procedures shall be carried out:</p> <ul style="list-style-type: none"> Prior to the commencement of ground-disturbing activities under the project, a qualified professional paleontologist shall be retained to conduct paleontological monitoring during project ground disturbing activities. The 	<p>Less than Significant</p>

Impact	Mitigation Measure(s)	Residual Impact
	<p>Qualified Paleontologist (Principal Paleontologist) shall meet the education and professional experience standards as set forth by the SVP, which recommends the paleontologist shall have at least a Master's Degree or equivalent work experience in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques.</p> <ul style="list-style-type: none"> ▪ Ground-disturbing construction activities (including grading, trenching, drilling with an auger greater than three feet in diameter, and other excavation) below five feet and within project areas with high paleontological sensitivity (i.e., Pleistocene alluvium; Qvof, Qof) shall be monitored on a full-time basis. Spot-check monitoring is recommended for ground disturbance below ten feet for project areas underlain by geologic units with low paleontological sensitivity (i.e., younger Quaternary alluvium; Qyf) to determine underlying sensitive units are being impacted. Monitoring shall be supervised by the Qualified Paleontologist and shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP, which includes a BS or BA degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources. ▪ The duration and timing of the monitoring shall be determined by the Qualified Paleontologist. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new ground disturbances are required and reduction or suspension would need to be reconsidered by the Qualified Paleontologist. ▪ If a paleontological resource is discovered, the monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Once salvaged, significant fossils shall be prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the Western Science Center in Hemet). Curation fees are the responsibility of the project owner. ▪ A final report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the project. The report shall include a summary of the field 	

Impact	Mitigation Measure(s)	Residual Impact
	and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the lead agency(s) for the project. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.	
Energy Conservation		
Impact E-1. The project would consume electricity, natural gas, and fuel during construction and operation. However, the project would not place significant demand on RPU or SoCalGas and would comply with applicable energy conservation standards. Impacts would be less than significant.	None Required	Less than Significant
Geology and Soils		
Impact GEO-1. A liquefaction analysis was conducted on soils collected from the project site and concluded low potential for liquefaction. Soils on the project site show significant potential for hydroconsolidation, or soil collapse. Site preparation, design, and review and monitoring recommendations in the geotechnical report prepared for the project address potential impacts associated with soil instability due to hydroconsolidation. This impact would be less than significant with mitigation incorporated.	<p>GEO-1 Plan Review and Construction Monitoring. Prior to the issuance of grading permits, project foundation and grading plans shall be reviewed by the geotechnical engineer to confirm consistency with all standards contained in the geotechnical report and required under the City's grading ordinance. Plans shall demonstrate positive drainage away from all structures, as recommended in the geotechnical report. All grading operations, including the preparation of the natural ground surface, shall be observed and compaction tests performed by the geotechnical engineer to ensure site preparation and grading adheres to over-excavation and relative compaction standards contained in the geotechnical report. Sub-excavated surfaces and all other surfaces to receive fill should be scarified to a minimum depth of 12 inches, moisture conditioned to at least 120 percent of the optimum moisture content, and densified to a minimum relative compaction of 90 percent pursuant to ASTM International standard D1557—Standard Test Methods for Laboratory Compaction Characteristics of Soil Using Modified Effort—as confirmed by the geotechnical engineer.</p> <p>GEO-2 Geotechnical Recommendation Implementation. All recommendations included in the approved geotechnical report shall be implemented as project conditions of approval. Such recommendations include, but are not limited to:</p> <ul style="list-style-type: none"> Over-excavation, moisture conditioning, densification, and relative compaction standards detailed in the geotechnical report Application of appropriate seismic design parameters cited in the geotechnical report 	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> Retaining wall design standards and soil backfill requirements Shallow foundation design standards, including placement of 12-inch wide footings at least 18 inches below the lowest final adjacent grade for retaining walls and one-, two-, and three-story buildings. The spread and wall footings should be designed for a maximum safe soil bearing pressure of 2,000 pounds per square foot for dead plus live loads. Footings for the 4-story buildings should be at least 24 inches in depth, and may be designed for a maximum safe soil bearing pressure of 2,500 pounds per square foot. Slab-on-grade design features specified in the geotechnical report, including four-inch thick floors and concrete slabs-on-grade reinforced with No. 3 bars at 24 inches on-center each way or equivalent. <p>The implementation of these recommendations shall be overseen by the geotechnical engineer throughout grading operations and shall be confirmed by the City of Riverside.</p>	
Greenhouse Gas Emissions		
Impact GHG-1. The proposed Project would generate GHG emissions that exceed the established service population threshold even with the implementation of mitigation measures. Because there are no feasible mitigation measures to control mobile emissions, this impact would be significant and unavoidable.	Implementation of mitigation measures AQ-3 and AQ-4, detailed in Section 4.2, Air Quality, would be required to reduce GHG emissions to the extent feasible. Mitigation Measure AQ-3 would require the exceedance of California Building Code Title 24 by 5 percent through implementing recommended measures and Mitigation Measure AQ-4 would require enhanced water conservation that reduced outdoor water use by 30 percent. These amounts are typical and the most feasible as building and landscaping requirements and materials become more efficient.	Significant and Unavoidable A Statement of Overriding Consideration is required prior to project approval
Impact GHG-2. The project would be consistent with the goals and strategies of SB 375 and SCAG's RTP/SCS, as well as with applicable measures in the 2017 Scoping Plan and the City's adopted Climate Action Plan. However, since the project would exceed thresholds established to meet GHG reduction targets, the project would conflict with adopted policies and impacts would be significant and unavoidable.	58 percent of the project's GHG emissions are from mobile sources. Even with the removal of all GHG emissions from construction, area, energy, solid waste, and water use, the project would still exceed SCAQMD thresholds, as detailed in Impact GHG-1. Therefore, there are no feasible mitigation measures to meet established thresholds created to meet GHG reduction targets.	Significant and Unavoidable A Statement of Overriding Consideration is required prior to project approval
Hydrology and Water Quality		
Impact HWQ-1. Construction and operation of the project could increase erosion and stormwater runoff due to site disturbance and increased impervious surface area. Compliance with applicable regulations and policies, including on-site	None Required	Less than Significant

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Impact	Mitigation Measure(s)	Residual Impact
capture and treatment of stormwater runoff through an infiltration BMP, would prevent the violation of water quality standards or waste discharge requirements. Impacts would be less than significant.		
Impact HWQ-2. Impervious surface cover would increase on the project site under the proposed project, reducing the potential for recharge of the underlying aquifer. However, all on-site runoff would be routed through a perforated detention chamber, where groundwater recharge would occur. Flows carried off the site via the existing University Drain system would continue to discharge to Lake Evans and the Santa Ana River, where additional potential for infiltration and recharge exists. This impact would be less than significant.	None Required	Less than Significant
Impact HWQ-3. Under the proposed project, all on-site stormwater runoff would be captured and treated via a detention and infiltration chamber, designed to accommodate the 85 th percentile, 24-hour precipitation depth. The project would not result in substantial off-site hydromodification impacts. However, covering and filling of existing drainages would result in substantial, permanent siltation of waterways on the project site. This impact would be less than significant with mitigation incorporated.	Mitigation measures BIO-3 and BIO-4, as described in Section 4.3, Biological Resources, would require compliance with applicable state and federal permitting requirements pertaining to streambed alteration and discharge of fill material to waters. Such permits would require adherence to avoidance and minimization measures and compensatory mitigation, as necessary.	Less than Significant
Impact HWQ-4. A portion of the project site is located in the 1-percent-annual-chance flood event zone, as designated by FEMA. This zone would be unlikely to continue to experience flooding under post-development drainage conditions. The project would be required to comply with applicable regulations pertaining to flood hazards, including development permit review by the City's Floodplain Administrator. This impact would be less than significant with mitigation incorporated.	HWQ-1 Letter of Map Revision. Prior to the issuance of building permits, the applicant shall obtain a revision to the Flood Insurance Rate Map reflecting post-development drainage conditions. This process will first entail a conditional letter of map revision prior to issuance of a grading permit. Then, prior to issuance of a building permit, a letter of map revision showing the actual "as built" plans shall be submitted. The applicant shall adhere to all FEMA-required processes and shall demonstrate, with supporting technical data, that the lowest point of all structures remain at or above the 1-percent-annual-chance flood event base flood elevation.	Less than Significant
Land Use and Planning		
Impact LU-1. The current land use and zoning designations would not allow the proposed project land uses and development design. The proposed project application, therefore, includes requests for a General Plan Land Use	None Required	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Amendment and a Zoning Code Amendment. Upon approval of the project, the proposed development would comply with all new applicable land use and zoning regulations. Impacts would be less than significant.		
Impact LU-2. The project is proposing development that would potentially impact biological resources in the Western Riverside Multiple Species Habitat Conservation Plan fee area. Implementation of mitigation measures BIO-1 through BIO-4 would reduce impacts to less than significant.	Implementation of mitigation measures BIO-1a, BIO-1b, BIO-2, BIO-3, and BIO-4, detailed in Section 4.3, Biological Resources, would reduce impacts to less than significant through conducting necessary burrowing owl and nesting bird surveys, avoiding jurisdictional features to the extent feasible, and mitigating impacted riparian habitat at a 1:1 ratio.	Less than Significant
Noise		
Impact N-1. Operation of the project would generate new vehicle trips on area roadways and result in a nominal increase in traffic-related noise levels at land uses adjacent to these roadways. The change in noise levels would not result in a substantial permanent increase in ambient noise levels in the area and would not exceed applicable thresholds. Therefore, impacts would be less than significant.	None Required	Less than Significant
Impact N-2. Operation of the project would generate new sources of noise in the project vicinity and result in a nominal increase in ambient noise levels at adjacent land uses. The change in noise levels would not result in a substantial permanent increase in ambient noise levels in the area and would not exceed applicable thresholds. Therefore, impacts would be less than significant.	None Required	Less than Significant
Impact N-3. Ambient noise levels in the project vicinity currently exceed exterior noise standards for residential uses. Project-specific operational noise levels would contribute minimally to the exterior noise levels at the nearest sensitive resources. To ensure project-specific noise source impacts do not independently exceed standards, mitigation would be required. Impacts would be less than significant with mitigation incorporated.	N-1 Operational Noise Barrier. The project applicant shall incorporate a permanent noise barrier along the entire northern boundary of the project site. The design for this barrier shall be completed prior to issuance of building permits, and construction of the barrier shall be completed prior to the issuance of a certificate of occupancy. The noise barrier shall be 6 feet high and shall consist of a solid face from top to bottom. Unnecessary openings or decorative cutouts in the barrier shall not be made. All gaps, except for weep holes, shall be filled with grout or caulking. The noise barrier shall provide a weight of at least four pounds per square foot of face area or it shall provide a minimum transmission loss of 20 dBA. The noise barrier shall be constructed using the following materials capable of providing a minimum transmission loss of 20 dBA:	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
	<ul style="list-style-type: none"> ▪ Decorative Masonry block; ▪ Precision masonry block with stucco 	
Impact N-4. Project construction would intermittently generate groundborne vibration on and adjacent to the site. This may affect sensitive receptors near the project site, but would not create excessive levels of vibration that could cause structural damage, disturb sleep at nearby sensitive residential receptors, or interfere with operation of the sensitive school receptor. Impacts would be less than significant.	None required	Less than Significant
Impact N-5. Construction activities would be conducted in accordance with the City's Noise Control Ordinance and are exempt from the noise level standards. However, construction of the project would result in a substantial temporary or periodic increase in ambient noise levels at adjacent sensitive receptors and therefore, mitigation measures are recommended to reduce construction noise impacts to the extent feasible.	None required	Less than Significant
Impact N-6. Outdoor events facilitated by the proposed project would result in a temporary and periodic increase in noise levels in the project vicinity. However, the additional noise generated by these events would not create a perceptible noise level increase at nearby sensitive noise receptors. Therefore, impacts would be less than significant.	None Required	Less than Significant
Recreation		
Impact REC-1. Implementation of the proposed project would incrementally increase use of existing City parks and recreational facilities. The proposed project would provide adequate on-site recreational space for residents that would complement and supplement existing City facilities. The project would also be required to pay City park impact fees. Therefore, the project would result in a less than significant impact.	None Required	Less than Significant
Impact REC-2. Proposed recreational facilities have been assumed to be part of the project. No additional or expanded recreational facilities would be required for the City as a direct result of this project. This impact would be less than significant.	None Required	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Transportation and Traffic		
<p>Impact T-1. Under Existing Conditions, four project study area intersections are operating at unacceptable LOS. Under Existing Plus Project Conditions, the proposed project would result in additional impacts to these intersections as well as result in unacceptable LOS at two additional intersections. There would be less than significant impacts with mitigation incorporated.</p>	<p>To reduce project impacts to traffic operations at intersections #3, #8, 11, #14, and #16, prior to the issuance of building permits, the applicant shall implement Mitigation Measures T-1 through T-3 and pay the project fair share for mitigation measures T-4 and T-5, as agreed to by the City and the applicant.</p> <p>T-1 Main Street and Strong Street (Intersection #3). Restripe the eastbound and westbound approaches to provide a left turn lane and a shared through-right turn lane. A conceptual striping plan is provided in Appendix 1.2 of the Traffic Impact Analysis.</p> <p>T-2 Orange Street and Strong Street (Intersection #8). Install a traffic signal.</p> <p>T-3 Orange Street and Oakley Avenue/SR 60 Westbound Ramps (Intersection #11). Install a traffic signal, construct a northbound left turn lane, and construct a westbound right turn lane with a minimum of 200 feet of storage.</p> <p>T-4 West La Cadena Drive and Interchange Street/I-215 Southbound Ramps (Intersection #14). Prior to the issuance of building permits, the applicant shall contribute their fair-share amount for the recommended improvements, which consist of signalization, a northbound left turn lane, and a southbound left turn lane.</p> <p>T-5 East La Cadena Drive and I-215 Northbound Ramps (Intersection #16). Prior to the issuance of building permits, the applicant shall contribute its fair-share amount for the recommended improvements at this intersection, which consists of signalization, restriping the northbound through lane as a shared through-left lane and construction of a second receiving lane on the on-ramp.</p>	<p>Less than Significant</p>
<p>Impact T-2. Under Existing Conditions, all roadway segments operate at an acceptable LOS. Under Existing Plus Project Conditions, all roadway segments would continue to operate at an acceptable LOS. Impacts would be less than significant.</p>	<p>None Required</p>	<p>Less than Significant</p>
<p>Impact T-3. Under Opening Year (2022) Without Project Conditions, six project study area intersections would operate at unacceptable LOS. Under Opening Year (2022) With Project Conditions, the proposed project would result in additional impacts to these intersections as well as result in unacceptable LOS at two additional intersections. Implementation of mitigation measures would require the project to pay a fair</p>	<p>T-6 Riverside Avenue/Main Street and Placentia Lane (Intersection #1). Prior to the issuance of building permits, the applicant shall contribute their fair-share amount for the recommended improvements, which consist of installation of a traffic signal.</p> <p>T-7 Orange Street and Russell Street (Intersection #12). Prior to the issuance of building permits, the applicant shall contribute their fair-share amount for the recommended improvements, which consist of installation of a traffic signal, and construction of</p>	<p>Less than Significant</p>

Impact	Mitigation Measure(s)	Residual Impact
share toward intersection improvements. Impacts would be less than significant with mitigation incorporated.	northbound, southbound, eastbound, and westbound left turn lanes. T-8 East La Cadena Drive and Columbia Avenue (Intersection #17). Prior to the issuance of building permits, the applicant shall contribute their fair-share amount for the recommended improvements, which consist of modifying the traffic signal to implement overlap phasing on the westbound right turn lane.	
Impact T-4. Under Opening Year (2022) Without Project Conditions, all roadway segments would operate at an acceptable LOS. Under Opening Year (2022) With Project conditions, all roadway segments would continue to operate at an acceptable LOS. Therefore, impacts would be less than significant.	None Required	Less than Significant
Cumulative Intersection Impacts. Study area intersections #1, #3, #5, #6, #8, #11, #12, #14, #16, and #17 are anticipated to operate at unacceptable LOS under 2040 Without Project and 2040 With Project conditions.	No feasible mitigation measures were identified to reduce impacts to Intersection #6 to less than significant levels. Implementation of mitigation measures T-1, T-2, T-3, T-5, T-7, and T-8 would reduce impacts at intersections #3, #8, #11, #12, #16, and #17 to less than significant levels. Implementation of Mitigation Measures T-9 through T-11 is required to reduce the project's contribution to cumulative impacts to intersections #1, #5, and #14 to less than significant levels. The Applicant shall pay the project fair share for the following improvements: T-9 Riverside Avenue/Main Street and Placentia Lane (Intersection #1). Prior to the issuance of building permits, the applicant shall contribute their fair-share amount for the recommended improvements, which consist of construction of a southbound approach to provide a second left turn lane. T-10 Main Street and SR 60 EB Ramps (Intersection #5). Prior to the issuance of building permits, the applicant shall contribute their fair-share amount for the recommended improvements, which consist of construction of a second southbound left turn lane. T-11 West La Cadena Drive and Interchange St/I-215 Southbound Ramps (Intersection #14). Prior to the issuance of building permits, the applicant shall contribute their fair-share amount for the recommended improvements, which consist of construction of a second southbound left turn lane and the westbound approach to provide a left turn lane.	Residual cumulative impacts to Intersections #1, #3, #5, #8, #11, #12, #14, #16, and #17 would be Less than Significant Residual cumulative impacts to Intersection #6 would be Significant and Unavoidable and a Statement of Overriding Consideration is required prior to Project approval.

Impact	Mitigation Measure(s)	Residual Impact
Cumulative Roadway Impacts. All study area roadway segments are anticipated to operate at an acceptable LOS under 2040 conditions except for Roadway Segment #1. Implementation of the project would contribute significantly to the cumulative roadway traffic. Impacts would be less than significant with the incorporation of mitigation.	Implementation of Mitigation Measure T-3 would provide additional capacity to Roadway Segment #1, thereby reducing impacts to less than significant levels.	Less than Significant
Tribal Cultural Resources		
Impact TCR-1. Construction of the project would involve ground-disturbing activities such as grading and surface excavation, with the potential to unearth or adversely impact previously unidentified tribal cultural resources. No known tribal cultural resources are present on the project site. Therefore, project impacts would be Less Than Significant Impacts with Mitigation Incorporated.	Implementation of mitigation measures CR-1 through CR-4 would reduce potential impacts to tribal cultural resources to less than significant levels by requiring an archaeology monitoring plan, cultural and archaeological sensitivity training, provisions for the treatment and disposal of cultural resources, and paleontological resources monitoring.	Less than Significant
Utilities and Service Systems		
Impact U-1. The project would demand 382 AFY of water, which would represent less than 0.49 percent of RPU's projected potable water demand for the year 2020. Based on the water supply and demand projections, projected water supplies are sufficient to meet the anticipated water demand of the project. Impacts would be less than significant..	None Required	Less than Significant

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1 Introduction

1.1 Purpose and Scope

In accordance with Section 15121 of the California Environmental Quality Act (*CEQA Guidelines*), the purpose of this Environmental Impact Report (EIR) is to serve as an informational document that:

will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (California Code of Regulations, Title 14).

This EIR has been prepared as a project EIR pursuant to Section 15161 of the *CEQA Guidelines*. A Project EIR is appropriate for a specific development project. The *CEQA Guidelines* state:

This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.

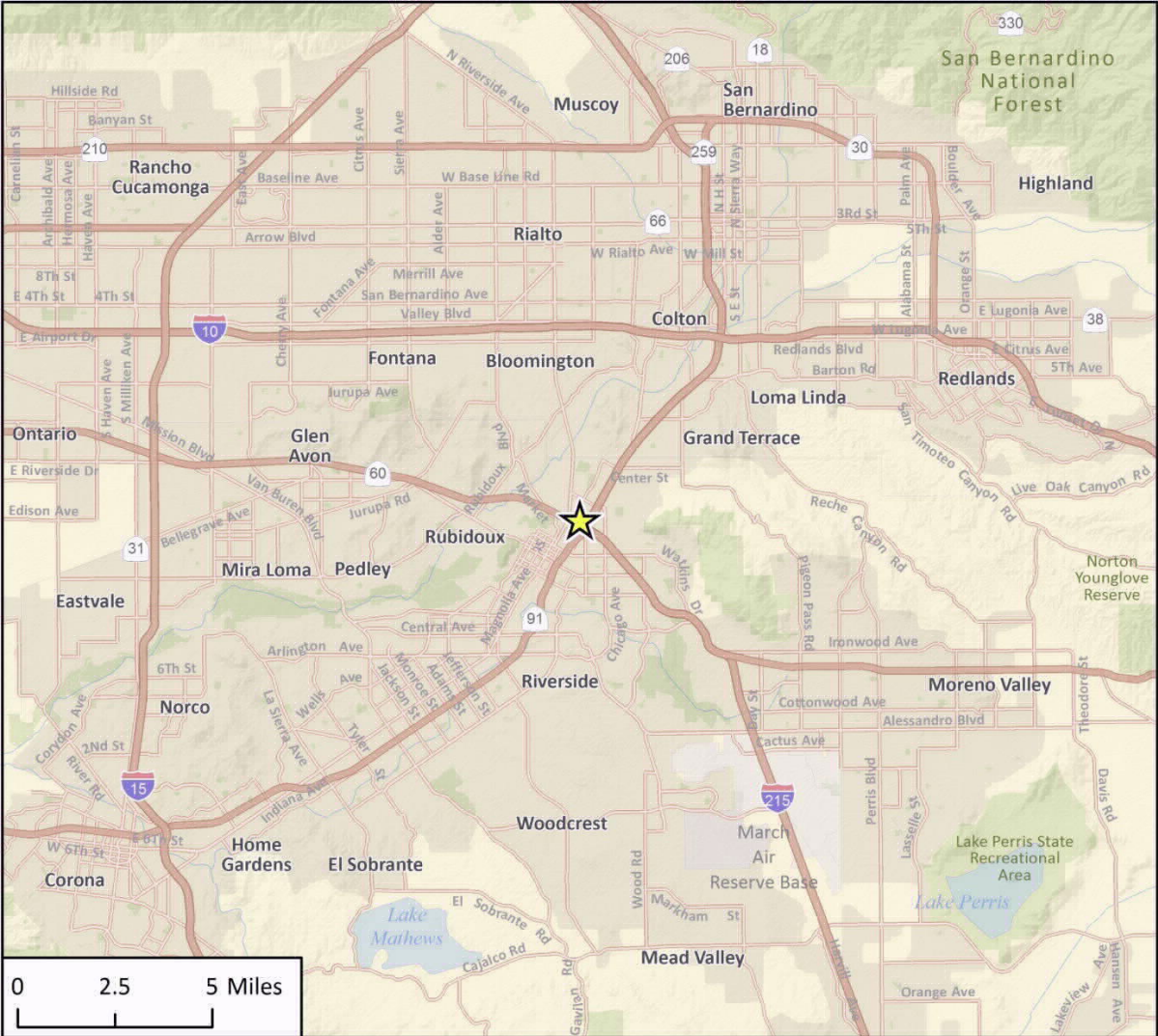
This EIR discloses the potential environmental consequences from the implementation of The Exchange Project, a proposed mixed-use development located at the northwest corner of the Interstate 215 (I-215) and State Route 60 (SR 60) interchange, in the City of Riverside, California. Figure 1-1 shows the regional location of the project.

The Exchange Project (hereafter referred to as the “proposed project” or “project”) would be constructed on a 35.4-acre site. The site is undeveloped except for a concrete stormwater channel extending east to west through the center of the property. Development of the proposed project would involve site clearing, rough grading and compaction, pouring of concrete and asphalt, and construction and operation of the proposed structures. The proposed mixed-use project would consist of multi-family residential dwelling units, multi-tenant commercial buildings, a vehicle fueling station, a drive-thru restaurant, two hotels, a recreational vehicle (RV) overnight parking component, and space for intermittent outdoor entertainment and on-site activities (e.g., farmers market, car shows).

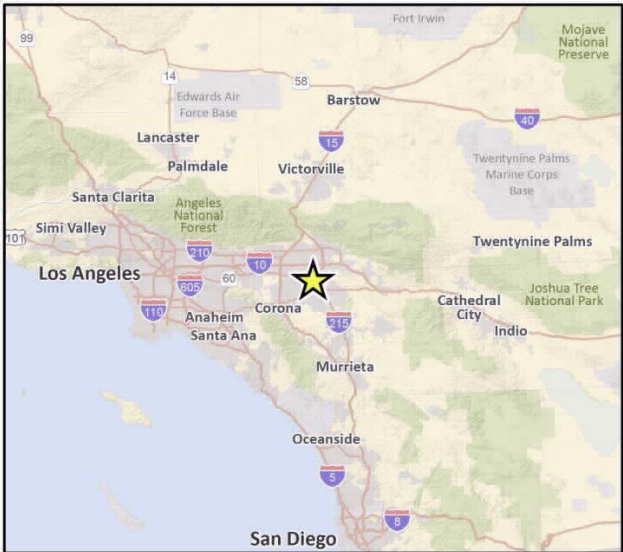
This EIR is to serve as an informational document for the public and City of Riverside (City) decision makers. The process to finalize the EIR includes public hearings before the Planning Commission and City Council to consider certification of a Final EIR and approval of the proposed project.

This section discusses (1) the EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) issue areas found not to be significant by the Initial Study; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required by CEQA. The proposed project is described in detail in Section 2.0, *Project Description*.

Figure 1-1 Regional Project Location



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1.2 Legal Authority

The City, as “Lead Agency,” prepared this EIR in accordance with the *CEQA Guidelines*, for the implementation of the California Environmental Quality Act (State CEQA Guidelines), Sections 15000-15387 of the California Code of Regulations, and the City’s CEQA Guidelines. The proposed project considered in this EIR is a “project,” as defined by Section 15378 of the State CEQA Guidelines, which states that an EIR must be prepared for any project that may have a significant impact on the environment. The City, as the Lead Agency, has determined the project may have a significant adverse impact on the environment, and, therefore, preparation of an EIR was required for project approval.

1.3 Environmental Procedure

The EIR process typically consists of three parts: the Notice of Preparation (NOP), the Draft EIR, and the Final EIR. Pursuant to Section 15060(d) of the CEQA Guidelines, the City initiated the environmental process with the preparation of an Initial Study (Environmental Checklist) for the project to determine if it would have a significant effect on the environment. Appendix A provides a digital copy of the Initial Study.

The City circulated the Initial Study and an NOP of the EIR for a 30-day agency and public review period starting July 25, 2018 and ending August 24, 2018. The City distributed the NOP to the State Clearinghouse, responsible agencies, and other interested parties.

The City held an EIR Public Scoping Meeting on August 2, 2018, from 6:00 PM to 8:00 PM at the Springbrook Clubhouse at 1011 Orange Street, Riverside. The meeting aimed to provide information about the proposed project and the CEQA process to members of public agencies, interested stakeholders, and residents/community members. In addition to verbal comments from members of the public during the Public Scoping Meeting, the City received one email from a resident, two letters from community groups, three comment cards from the Public Scoping Meeting, and three letters from public agencies. The NOP and all comments received during the 30-day review period are provided in Appendix B. Table 1-1 summarizes written and verbal comments from agencies and interested parties in response to the NOP; it also details where each is addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where it was Addressed
Agency Comments		
South Coast Air Quality Management District (SCAQMD)	The project is in close proximity to two major freeways: State Route 60 and Interstate 215. Residents would be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and a carcinogen. SCAQMD recommends the Lead Agency conduct a health risk assessment (HRA) to disclose potential health risks to residents. SCAQMD further recommends the Lead Agency review the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005) when making decisions on the project.	A Health Risk Assessment was conducted and is attached as Appendix E. Impacts to air quality are discussed in Section 4.2, <i>Air Quality</i> .

Commenter	Comment/Request	How and Where it was Addressed
	Requests mitigation measures to minimize or eliminate significant adverse impacts to air quality. Specifically measures to reduce exposure of toxic air contaminants.	Mitigation measures listed in Section 4.2, <i>Air Quality</i> , require the use of super low VOC paints, site preparation and grading watering, the exceedance of California Building Code Title 24, and enhanced water conservation measures to demonstrate a minimum of 30% reduction of outdoor water use.
	Requests a discussion of alternatives, especially if there is a significant adverse air quality impact.	Alternative are discussed in Section 6, <i>Alternatives</i> .
Southern California Gas Company (SoCalGas)	SoCalGas does not operate any facilities within the project. However, SoCalGas Southeast Distribution Region may maintain and operate facilities.	Email sent to SoCalGas Southeast Distribution Region contact on September 27 2018, with a requested respond-by date of October 5, 2018. No response was received by the City.
Native American Heritage Commission (NAHC)	States that the proposed project is subject to the requirements and provisions under Assembly Bill (AB 52) and Senate Bill (SB 18) for tribal cultural resources.	Consultation required by AB 52 and SB 18 was carried out by the City of Riverside as part of this project. Impacts to cultural resources are discussed in Section 4.4, <i>Cultural Resources</i> , and Section 4.13, <i>Tribal Cultural Resources</i> of this EIR.
Public Comments		
Stacy Mollony, Resident	What impacts would the project have on new students overcrowding Fremont School, located adjacent to the project site?	Impacts to schools are addressed in Section 4.15, <i>Impacts Found to be Less than Significant</i> , and in the Initial Study Section 14, <i>Public Services</i> , attached as Appendix A.
	The project should consider senior housing and assisted living as a feasible alternative as it would not impact schools and reduce the potential for crime.	Alternatives are discussed in Section 6, <i>Alternatives</i> .
	Apartments bring gangs and crime and the hotels would bring transients, drugs, and prostitution to the area.	Impacts to public services, including police services, are discussed in Section 4.15, <i>Impacts Found to be Less than Significant</i> , and in the Initial Study, Section 14 <i>Public Services</i> attached as Appendix A.
	The resident believes the project is ugly and not an improvement to the Northside Neighborhood.	Project design features are discussed in Section 2, <i>Project Description</i> . Impacts to aesthetics are discussed in Section 4.1, <i>Aesthetics</i> .
Gary L - Resident	Will La Cadena be widened through the project site? The proposed two-lane road is too narrow.	A Traffic Impact Analysis was conducted and is attached as Appendix L Impacts from traffic are discussed in Section 4.12 <i>Transportation and Traffic</i> .
	Resident would like to see Strong Street closed to the east at La Cadena.	Project traffic and circulation are discussed in Section 4.12 <i>Transportation and Traffic</i> .
	The adjacent properties along Strong Street all drain into the project site. How will the project handle the drainage?	Impacts to and from hydrological features are discussed in Section 4.8, <i>Hydrology and Water Quality</i> .

Commenter	Comment/Request	How and Where it was Addressed
Michael Ervin-Resident	A resident-only dog park restricts the property and should be open to the public. The dog park could be expanded to include playground facilities since it is near a school. The City is short on park space and the area could be a larger recreational opportunity for the City.	Impacts to recreational facilities are discussed in Section 4.11, <i>Recreation</i> . Alternatives are discussed in Section 6, <i>Alternatives</i> .
	Traffic is a problem when school is in session and will be a bigger problem with the project. The project should find a way to alleviate traffic congestion by the school.	Traffic impacts are discussed in Section 4.12, <i>Transportation and Traffic</i> .
Ted K. - Resident	Will this project substantially change the site through grading?	Project grading plans are available for review at the City and involve rough grading and compaction to level the site. Standard conditions of approval would ensure project compliance with applicable City policies and codes related to grading. Changes in site topography and impacts water flow are discussed in Section 4.8, <i>Hydrology and Water Quality</i> .
	The project should consider incorporating low-income housing into the project.	Alternatives are discussed in Section 6, <i>Alternatives</i> .
John Gonzales-Resident	The project will be saturated with light in an area that is currently a peaceful area.	Impacts from light and glare are discussed in Section 4.1, <i>Aesthetics</i> .
	The project is proposing a very dense development which will be saturated with people and housing. It will create bumper to bumper traffic.	Project density is discussed in Section 2, <i>Project Description</i> , and Section 4.9, <i>Land Use and Planning</i> . Traffic impacts are discussed in Section 4.12, <i>Transportation and Traffic</i> .
	What is going to happen to the wash? Areas on the site already have flooding issues.	Proposed changes to the wash are discussed in Section 2, <i>Project Description</i> . Flooding impacts are discussed in Section 4.8, <i>Hydrology and Water Quality</i> .
	The project has three story apartments. Will they be able to look down into our properties?	Project design features are discussed in Section 2, <i>Project Description</i> . Impacts related to aesthetics are discussed in Section 4.1, <i>Aesthetics</i> . Compliance with setback regulations is discussed in Section 4.9, <i>Land Use and Planning</i> .
Deb Bloodworth-Resident	Would the project have impacts on the ability of the neighbors to have chickens and goats?	The project does not change the use of the neighboring private properties. Compatibility of the proposed project to the neighboring properties is discussed in Section 4.9, <i>Land Use and Planning</i> .
	Could the project install a block wall along the properties on Strong Street? This would be helpful to reduce noise and improve views from the existing residents.	The project includes the construction of a wall along the north property line. Project design features are discussed in Section 2, <i>Project Description</i> .
	Why would the City allow a zone change for this project, but not change the zoning in other areas of the City where warehouses are being proposed?	This EIR analyzes impacts related to the implementation of the proposed project only. Land use and zoning change impacts are discussed in Section 4.9, <i>Land Use and Planning</i> .

Commenter	Comment/Request	How and Where it was Addressed
	Will the apartments be able to look down on our properties and affect our privacy?	Project design features are discussed in Section 2, <i>Project Description</i> . Impacts related to aesthetics are discussed in Section 4.1, <i>Aesthetics</i> . Compliance with setback regulations is discussed in Section 4.9, <i>Land Use and Planning</i> .
Resident	How dirty and dusty will it be during construction activities?	Air quality impacts from construction activity and associated mitigation measures are discussed in Section 4.2, <i>Air Quality</i> .
Vivian Gonzales-Resident	Traffic at the school is already a mess and traffic along La Cadena getting on the freeway is always really bad in the mornings.	Traffic impacts are discussed in Section 4.12, <i>Transportation and Traffic</i> .
	Riverside does not currently have problems with brownouts during the summer. How will the project, specifically air conditioning use, affect the potential for brownouts in the City?	Energy efficiency, consumption, and compliance with greenhouse gas reduction plans are analyzed in Section 4.5, <i>Energy Conservation</i> , and Section 4.7, <i>Greenhouse Gas Emissions</i> .
Resident	Will the RV Park be secured and will there be hookups?	Details of the RV parking lot are discussed in Section 2, <i>Project Description</i> .
Nyle Bloodworth-Resident	My house is on a hill above the project site, will the project involve the construction of any retaining walls?	Grading plans are available for review at the City and detail the location of all retaining walls. Project design features are discussed in Section 2, <i>Project Description</i> .
Steve McKee-Resident	Are solar systems proposed for any of the structures?	Project design features are discussed in Section 2, <i>Project Description</i> . Energy conservation measures are discussed in Section 4.5, <i>Energy Conservation</i> .
Wittwer Parkin representing Southwest Carpenters	The Initial Study did not provide project description information in one central location. Please provide information on leasable commercial space, a definitive list of all project approval requirements, and more details regarding the RV facilities.	Project details are discussed in Section 2, <i>Project Description</i> .
	Disclose information on the temporary events proposed to occur in the project parking lots. Does the City intend to limit the size, location, number, dates, and duration of these temporary events?	Project details, including the provision for special or temporary outdoor events, are discussed in Section 2, <i>Project Description</i> . Impacts related to noise from special or temporary events are discussed in Section 4.10, <i>Noise</i> . Other restrictions that may be imposed on special or temporary events would be addressed through conditions of approval for the Conditional Use Permit for the specific event.
	100 square foot balconies are not sufficient for open space. Does the City have an open space impact fee?	Open space requirements and provisions are discussed in Section 2, <i>Project Description</i> , Section 4.9, <i>Land Use and Planning</i> , and Section 4.11, <i>Recreation</i> . Open space impact fees are implemented through the City's permitting process and are not an area of concern under CEQA.

Commenter	Comment/Request	How and Where it was Addressed
	Please disclose the total volume of grading and account for these impacts.	Preliminary grading plans are available for review at the City and final grading plan will detail the total volume of cut and fill proposed for this project. Project construction assumptions, including a discussion of grading, are discussed in Section 2, <i>Project Description</i> .
	The project will conflict with the AQMP, please mitigate accordingly.	Impacts to air quality and associated mitigation measures are discussed in Section 4.2, <i>Air Quality</i> .
	Reassess the significance of particulate matter emissions.	An Air Quality Study was conducted and attached as Appendix B. Impacts to air quality are discussed in Section 4.2, <i>Air Quality</i> .
	Provide a baseline of species present and potentially present.	A Multiple Species Habitat Conservation Plan Consistency Analysis and Habitat Assessment was conducted and is attached as Appendix F. Impacts to biological resources are discussed in Section 4.3, <i>Biological Resources</i> .
	Impacts to wildlife movement have not been fully addressed in the initial study.	Impacts to biological resources are discussed in Section 4.3, <i>Biological Resources</i> .
	Please fully disclose and describe impacts to cultural resources and mitigation measures, not simply the conditions of approval. The project also has the potential to impact human remains. Please disclose and address these impacts.	A Cultural Resources Report was prepared and attached as Appendix H. Impacts to cultural resources are discussed in Section 4.4, <i>Cultural Resources</i> .
	Why are impacts to cultural resources less than significant but potentially significant to tribal cultural resources?	Impacts to general cultural resources are discussed in Section 4.4, <i>Cultural Resources</i> . Impacts specific to tribal cultural resources are provided in Section 4.13, <i>Tribal Cultural Resources</i> .
	Please test, evaluate, and fully disclose the potential of all areas of the Project to cause liquefaction.	A Hydrology and Geotechnical Analysis was conducted and attached as Appendix J. Impacts related to liquefaction are discussed in Section 4.6, <i>Geology and Soils</i> .
	The DEIR should include a discussion of the impact of construction activities on erosion and loss of topsoil.	Impacts to construction activities on erosion and loss of topsoil are found in Section 4.15, <i>Impacts Found to be Less than Significant</i> and in Section 6, <i>Geology and Soils</i> , of the Initial Study in Appendix A.
	Please clarify if there is reliable data that the project site does not contain expansive soils.	Please reference the Hydrology and Geotechnical Analysis, attached as Appendix J.
	The project is estimated to emit 22,182 MTCO ₂ e per year. The City must provide mitigation to the maximum extent feasible.	Impacts related to greenhouse gas emissions and associated mitigation measures are discussed in Section 4.7, <i>Greenhouse Gas Emissions</i> .
	The project will emit, transport, and handle hazardous materials near a school. This is a significant impact which requires disclosure and mitigation. The City must disclose all pertinent information	Impacts related to hazards and hazardous materials are discussed in Section 4.15, <i>Impacts Found to be Less than Significant</i> and in Section 8, <i>Hazards and Hazardous Materials</i> , of the Initial Study in Appendix A.

Commenter	Comment/Request	How and Where it was Addressed
	regarding hazards and require mitigation that reduces potential hazards to workers.	
	Identify any aquifers potentially affected by the project and their current status.	Please refer to Section 4.14, <i>Utilities and Service Systems</i> .
	Evaluate impacts of impervious surfaces on hydrology and water quality.	Please refer to Section 4.8, <i>Hydrology and Water Quality</i> .
	The EIR should identify and discuss all relevant policies the City has related to environmental protection and evaluate whether a project conflicts with these policies.	Relevant environmental policies are discussed in each of the topics under Section 4, <i>Environmental Impact Analysis</i> . Discussion on land use and zoning change and compliance with policies and regulations are provided in Section 4.9, <i>Land Use and Planning</i> .
	The project proposes all market rate housing units. Discuss whether the project is consistent with the Housing Element and condition the project to provide affordable housing.	Discussion on housing is provided in Section 13, <i>Population and Housing</i> , of the Initial Study provided in Appendix A.
	Why is the project determined to have an impact on parks but not police, fire, or schools?	Impacts to recreation facilities are discussed in Section 4.11, <i>Recreation</i> . Impacts to other public services are discussed in Section 4.15, <i>Impacts Found to be Less than Significant</i> and in Section 14, <i>Public Services</i> , in the Initial Study provided in Appendix A.
	Impacts to public services ignore cumulative impacts of development in the City. The City should address cumulative impacts on these services.	Cumulative projects are listed in Table 3-1 in Section 3, <i>Environmental Setting</i> , and impacts to public services are discussed in Section 4.15, <i>Impacts Found to be Less than Significant</i> and in Section 14, <i>Public Services</i> , in the Initial Study, provided in Appendix A.
	The City should consider the direct, indirect, and cumulative impacts of the project on wastewater treatment facilities during peak wet-weather conditions.	Impacts from wet-weather conditions on wastewater treatment facilities are provided in Section 4.14, <i>Utilities and Service Systems</i> .
	The City indicated a WSA will be conducted.	A Water Supply Assessment was conducted and is attached as Appendix N,
Laborers International Union of North America, local union #1184	Requests mailed notices of any and all actions or hearings related to any public hearing in connection with the project and notices pursuant to CEQA.	This comment is noted and the commenter has been added to the project activity contact list.
Melanie Wennerstrom	The resident would like a fence to be put up between project and residential areas prior to construction to protect from noise and dust.	Temporary construction and operational noise impacts are discussed in Section 4.10, <i>Noise</i> . Impacts related to dust from construction are addressed in Section 4.2, <i>Air Quality</i> .
	Resident recommends secondary grey water systems for landscaping as water is becoming scarce and getting more expensive.	Details on proposed landscape design are discussed in Section 2, <i>Project Description</i> . Impacts to water resources are discussed in Section 4.14, <i>Utilities and Public Services</i> . Mitigation measure AQ-4 in Section 4.2, <i>Air Quality</i> , also provides measures for reducing outdoor water use.

Commenter	Comment/Request	How and Where it was Addressed
	Fueling station should include electric charging stations and a place for dogs to go to the bathroom.	The project is required to comply with all applicable development regulations and design features. This is not a CEQA concern.
	Make the drive-thru a co-op food cafeteria staffed by RCC culinary	The project is required to comply with land use and zoning regulations for permitted uses on-site. This is not a CEQA concern.

1.4 Scope and Content

This EIR addresses impacts identified by the Initial Study to be potentially significant. The following issues were found to include potentially significant impacts and have been studied in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy Conservation
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

EIR preparation included use of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. References are provided at the end of each section.

The alternatives section of the EIR (Section 6.0) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives capable of eliminating or reducing significant adverse effects associated with the project while potentially and feasibly attaining most of the basic project objectives. The alternatives section identifies the "environmentally superior" alternative among the alternatives assessed; the evaluation included the CEQA-required "No Project" alternative and three alternative development scenarios for the project area.

The level of detail throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based, as follows:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.5 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible, and trustee agencies. The City is the lead agency for the project because it holds principal responsibility for approving the proposed project.

A responsible agency refers to a public agency other than the lead agency with discretionary approval over the project. Responsible agencies for the proposed project include:

- **Santa Ana Regional Water Quality Control Board**, which regulates water quality in the region
- **California Department of Transportation**, which regulates state roads and highways
- **California Department of Fish and Wildlife**, which protects and conserves fish and wildlife resources
- **U.S. Army Corps of Engineers**, which regulates waters of the United States
- **Riverside County Flood Control and Water Conservation District**, which protects residents from flood hazards

A trustee agency refers to a state agency with legal jurisdiction over natural resources affected by a project. Trustee agencies for the proposed project include:

- **South Coast Air Quality Management District**, which regulates air quality in the region

Section 2.7 of the *Project Description* details permits required for implementation of the proposed project. All responsible and trustee agencies have been notified of the proposed project and the preparation of this EIR. The Draft EIR will be provided to these agencies for review and comment.

1.6 EIR Format

This EIR has been organized in several sections as follows:

- **Table of Contents.** Assists readers in locating the analysis of different subjects and issues as required by Section 15122 of the State CEQA Guidelines
- **Executive Summary.** Identifies the project applicant and lead agency, covers the summary requirements of CEQA by providing a brief project description, lists required approvals, discusses the alternatives considered, and summarizes the environmental impacts in a table
- **Section 1 – Introduction.** Describes the scope and purpose of the EIR, lead, responsible, and trustee agencies, provides a brief summary of the CEQA process to date, summarizes the documents incorporated by reference, identifies the parties that provided written and verbal comments in response to the NOP, summarizes the comments provided, and identifies the location in the EIR in which the comments are addressed
- **Section 2 – Project Description.** Details the existing site characteristics and background, provides photographs of the existing site and area, describes the current land use regulation of the site and the surrounding area, and details the various proposed project components including location, size, construction schedule, proposed land uses, project objectives, and required approvals
- **Section 3 – Environmental Setting.** Provides a general overview of the regional and project site setting, including proposed cumulative projects in the area

- **Section 4 – Environmental Impact Analysis.** Discusses the possible environmental impacts of the project for the various environmental issue areas, divided into specific environmental issues where the project was identified as having potentially significant impacts
- **Section 5 – Other CEQA.** Analyzes the growth-inducing and irreversible environmental impacts of the project
- **Section 6 – Alternatives.** Provides a range of reasonable alternatives to the project, as required by Section 15126.6 of the *CEQA Guidelines*, which would attain the project objectives and avoid or lessen at least one of the significant impacts
- **Section 7 – References.** Provides the sources of information used to develop and analyze environmental impacts of the project, including reference material, contact persons, and a list of preparers

1.7 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below. The steps are presented in sequential order.

1. **NOP and Initial Study.** After deciding an EIR is required, the Lead Agency (City) must publically circulate an NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts.
2. **Draft EIR Prepared.** The Draft EIR must contain a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing, and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public, and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).
4. **Final EIR.** A Final EIR must include a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making any decision on a proposed project, the lead agency must certify that a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project, and d) the

Final EIR reflects the lead agency's independent judgement and analysis (*CEQA Guidelines* Section 15090).

6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and a statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file an NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the county clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

2 Project Description

This section describes the proposed project, identifies the project applicant, the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval.

2.1 Project Applicant

AFG Development, LLC
1451 Research Park Drive, Suite 200
Riverside, California 92507

2.2 Lead Agency Contact Person

Brian Norton, Senior Planner
City of Riverside
Planning Division, Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92552
951-826-2308

2.3 Project Location

The approximately 35.4-acre project site is located in the northwestern section of the City of Riverside, and is bounded generally by Orange Street to the west, Strong Street to the north, State Route (SR) 60 to the south and Interstate 215 (I-215) to the east. The project site comprises the following parcel numbers:

- | | |
|---------------|---------------|
| ▪ 209-151-029 | ▪ 209-020-061 |
| ▪ 209-151-036 | ▪ 209-020-062 |
| ▪ 209-020-022 | ▪ 209-060-023 |
| ▪ 209-020-047 | ▪ 209-060-027 |
| ▪ 209-020-048 | ▪ 209-060-029 |
| ▪ 209-020-059 | ▪ 209-070-015 |
| ▪ 209-020-060 | |

Figure 2-1 shows the location of the site in its neighborhood context. The site is in an urban area, has been previously graded and developed, and is surrounded by roads, highways, residential buildings, and a school.

Figure 2-1 Project Site Location



2.4 Existing Site Characteristics

2.4.1 Project Site Background

Land uses in the project vicinity were largely rural through the 19th and early 20th centuries, with a mixture of ranches, orchards, and rural homesteads. Residential development in the vicinity of the project site began in the early 1900s with construction of several homes along Strong and Orange Streets. Single-family residences were constructed on the project site in the 1920s, but were demolished by the late 1980s. Remnants of residences remain on the site and include a series of joined concrete walls, concrete posts, railing, and retaining walls.

The University Wash/Thornton Storm Drain traverses the project site from east to west; it was completed in 1981 by the Riverside County Flood Control and Water Conservation District. It is still in operation under the control of Riverside County Flood Control and Water Conservation District.

Three freeways converge at the southeast corner of the subject property: California SR 60, California SR 91, and I-215. SR 60, known as the Pomona Freeway, runs along the southern boundary of the subject property. SR 91, known as the Riverside Freeway, runs along a portion of the eastern boundary of the site; it was constructed between 1963 and 1975. I-215 also runs along a portion of the eastern boundary of the project site; it was constructed originally as U.S. 395. In 1982, it was re-designated I-215.

The Riverside Interchange (Interchange) consists of the I-215, SR 60, and SR 91 freeways. It was constructed in the late 1950s in a cloverleaf interchange design. The interchange underwent a \$317 million upgrade that was completed in 2008. Reconstruction replaced loop ramps that joined I-215 north with SR 91 south and I-215 south with SR 60 east. Construction included widening 5.0 miles of the intersecting freeways and reconstructing 11 vehicular bridges.

The project site is undeveloped except for a concrete storm drain that traverses the center of the site. It supports mature trees and seasonal grasses. Remnant foundational material is on the site from residences demolished previously. Figure 2-2a and Figure 2-2b below present images illustrating existing conditions of the site.

2.4.2 Current Land Use Designation and Zoning

A number of land use designations and zoned districts regulate the site. These include General Plan Land Use designations of O – Office and MDR – Medium Density Residential, and zoning designations of R-1-7000 – Single Family Residential, R-3-1500 – Multiple Family Residential, and R-1-7000-WC – Single Family Residential and Water Course Overlay.

2.4.3 Surrounding Land Uses

The site is bordered on the north and west by existing residential, institutional, and commercial development. A majority of the adjacent uses are single-family residences along Orange and Strong Streets. Fremont Elementary school is west of the project site, and Calvary Baptist Church is adjacent to the site on the north. Commercial uses occur to the southwest of the site near the SR 60 off-ramp. The southern portion of the site is bounded by SR 60 and the eastern portion of the site is bounded by I-215. Table 2-1 details the surrounding land use pattern and land use regulatory designations.

Figure 2-2a Site Photograph



View of the project site looking southeast from the western boundary

Figure 2-2b Site Photograph



View of the concrete-lined storm drainage facing south from the center of the site

Table 2-1 Surrounding Land Use Designations

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant Land	MDR - Medium Density Residential, O - Office	R-1-7000 - Single Family Residential, R-3-1500 – Multi-Family Residential, R-1-7000-WC – Single Family Residential and Water Course Overlay
North	Residential, Calvary Baptist Church	MDR - Medium Density Residential, O – Office, B/OP - Business/Office Park	R-1-7000 - Single Family Residential, R-1-7000-CR - Single Family Residential and Cultural Resources Overlay
West	Residential, Commercial, Fremont Elementary School	MDR - Medium Density Residential, C - Commercial, PF - Public Facilities/ Institutional	R-1-7000 - Single Family Residential, PF - Public Facilities/ Institutional, R-1-7000-WC - Single Family Residential and Water Course Overlay, CG - Commercial General
South	Commercial, Business & Office Park, SR 60	C - Commercial, B/OP - Business/Office Park	R-1-7000 - Single Family Residential, BMP - Business and Manufacturing Park
East	Residential, I-215	MDR - Medium Density Residential	R-1-7000 - Single Family Residential

2.5 Project Characteristics

The proposed mixed-use project would consist of multi-family residential dwelling units, multi-tenant commercial buildings, a vehicle fueling station, a drive-thru restaurant, two hotels, recreational vehicle (RV) overnight parking, and space for intermittent outdoor entertainment and on-site activities (e.g., farmers market, car shows). The residential portion of the project would be constructed on approximately 18.4 acres on the northern half of the project site. The commercial, vehicle fueling station, and drive-thru restaurant portion of the project would be located on approximately 7.6 acres located in the southwest corner of the project site. Two hotel buildings with associated parking would be located on approximately 7.4 acres, near the southeast corner of the project site. The proposed RV parking area would be located in the southeast corner of the project site, closest to the SR 60/I-215 interchange and adjacent to the proposed hotels. Figure 2-3 shows the site plan and layout of the proposed project.

The project would provide an additional source of tax revenue through property, sales, and transient occupancy taxes. The commercial portion of the project would bring additional jobs to the City, provide amenities to the surrounding neighborhood, and add regional shopping areas to the City. Additionally, the RV parking and hotels would allow more people to visit and stay in the City.

The retail shops would generally operate 12 to 15 hours a day, with the exception of the proposed gas station, which would operate 24 hours a day. The hotels and RV parking would operate 24 hours a day. The proposed site plan, floor plans, elevations, and landscape plans are included in Appendix M of this report. Figure 2-2a and Figure 2-2b show photographs of the existing undeveloped site with the concrete wash that would be covered by roadways and parking as part of the development.

Figure 2-3 Proposed Site Plan



THE EXCHANGE
AFG DEVELOPMENT
1451 RESEARCH PARK DRIVE, SUITE 200, RIVERSIDE, CA 92507

RIVERSIDE, CA

DATE: 12-17-2018
JOB NO.: 2017-057
ARCHITECTS ORANGE
144 NORTH ORANGE ST., ORANGE, CA 92686
(714) 639-9860



2.5.1 Residential Component

The residential component of the proposed project would be on approximately 18.4 acres, on the northern portion of the site, and would include 482 one-, two-, and three-bedroom multi-family residential units in 21 three-story buildings. This would amount to a density of 26.2 dwelling units per acre, and an average unit size of 995 square feet. All residential units would be provided at market rate. The residential component of the development would incorporate a number of amenities, including 10 ground-level live-work units, two fitness centers, two clubhouses, two outdoor pool areas, and a resident-use-only dog park.

Of the 482 units, 157 residential units would be one-bedroom/one-bathroom, ranging in size from 710 to 796 square feet (sf). Ten of the one-bedroom/one-bathroom units would be dedicated live/work units. Three-hundred-eight residential units would be two-bedroom/two-bathroom, ranging in size from 1,015 to 1,159 sf. The remaining 17 residential units would be approximately 1,297 sf, three-bedroom/ two-bathroom units.

Table 2-2 Residential Unit Details

Unit Types	Number of Units	Percentage of Total Unit Count	Unit Size (sf)
1-bedroom	157	33%	710 - 796
2-bedroom	308	64%	1,015 - 1,159
3-bedroom	17	4%	1,297
Total	482	100%	Average: 995

Residential Parking Component

Per the City of Riverside Off-Street Parking and Loading Standards, residential developments require one to two parking spaces per unit, depending on the number of proposed bedrooms. A total of 886 parking spaces would be required for the residential component of the project. Zoning regulations require 75 percent of the total required spaces be covered (i.e., in a garage or carport). The residential parking areas would be accessed from three gated vehicle entry points.

The project proposes to provide the residential portion of the project with 167 standard open parking stalls, 24 diagonal open stalls, 18 American with Disabilities Act (ADA)-accessible open stalls, 346 standard covered carports, 6 ADA-accessible covered carport spaces, 318 attached fully enclosed standard garages, and 7 ADA-accessible fully enclosed garages. A total of 886 parking spaces would be provided for residential and visitor use, as detailed in Table 2-3. Of these, 76 percent, or 677 spaces, would be covered or enclosed, as detailed in Table 2-4.

Table 2-3 Residential Unit Parking Requirements

Number and Type of Unit	Required Parking Ratio (spaces per unit)	Parking Spaces Required	Parking Spaces Provided
157 1-bedroom	1.5	236	236
308 2-bedroom	2.0	616	616
17 3-bedroom	2.0	34	34
Total	1.5 - 2.0	886	886

Table 2-4 Covered Parking Space Compliance

Parking Type	Total Number of Parking Spaces
Stall (Uncovered)	209
Garage (Covered)	325
Carport (Covered)	352
Total Spaces	886
Required Covered Spaces	665 (76 percent of total)
Total Provided Covered Spaces	677

2.5.2 Commercial Component

The commercial component of the proposed project would include 49,000 sf of leasable commercial space in eight buildings, on approximately 7.6 acres, primarily on the southwest portion of the site. The commercial building breakdown is included in Table 2-5. Buildings P1 through P4 are multi-tenant, with each building capable of having two to four tenants. Building shops 1 and 2 are larger multi-tenant structures that can accommodate up to eight commercial tenants within 8,000 sf and 12,000 sf. Buildings P5 and P6 are stand-alone commercial uses. Building P5 is proposed as a drive-thru restaurant. The proposed fueling station (Building P6) would include six pumping stations (12 pumps), a drive-thru car wash, and a convenience store with quick-serve restaurant.

Table 2-5 Commercial/Retail Building Size Details

Building Number	Size (sf)
Building P1	5,500
Building P2	5,000
Building P3	5,500
Building P4	4,500
Building P5 (drive-thru restaurant)	4,000
Building P6 (fueling station with quick serve restaurant)	4,500
Building Shops 1	12,000
Building Shops 2	8,000
Total	49,000

Commercial Parking Component

The exact tenant mix of the commercial tenant is undetermined. However, the site plan indicates that 15,000 sf of the proposed commercial component would be leased by retail tenants, while 34,000 sf would be leased by restaurant tenants. The City of Riverside Parking and Loading Standards require one parking space for every 250 sf of retail space, and one parking space for every 100 sf of restaurant space. As detailed in Table 2-6, the proposed project would require 400 total parking spaces. The commercial component of the proposed project would provide 400 parking spaces for retail and restaurant customers, which would include the provision of required ADA-compliant spaces.

Table 2-6 Commercial/Retail Parking Requirements

Use (total sf)	Required Parking Ratio	Required Number of Parking Spaces	Provided Number of Parking Spaces
Retail (15000 sf)	1 space/250 sf	60	60
Restaurant (34000 sf)	1 space/100 sf	340	340
Total		400	400

2.5.3 Hotel and RV Parking Component

The hotel component would include approximately 130,000 sf between two buildings, on approximately 7.4 acres of the project site. The hotels would contain a total of 229 rooms, and each building would be four stories in height. The hotels would be fully separate entities; owned and operated by separate companies with independent amenities. Hotel 1 would be approximately 70,000 sf and contain 120 rooms. Hotel 2 would be approximately 60,000 sf and contain 109 rooms. Each hotel would have a pool for visitor use.

In addition, the proposed project would include short-term RV parking, situated on the southeast portion of the project site, south of Hotel 2. Each RV parking space would be equipped with water, gas, sewer, and electrical hookups. The RV parking component would include an on-site manager, security monitoring, and the potential for crossover amenities and management by the hotels. Use of the RV parking area would be for short-term visitors only and visitors would be limited to 30 days in one stall.

The City of Riverside Parking and Loading Standards require 1.0 parking space per hotel room. A total of 266 shared parking spaces would be dedicated to the hotels. Hotel 1 would utilize 124 parking spaces and include the provision for eight ADA-compliant spaces; Hotel 2 would utilize 142 parking spaces, including six ADA-compliant spaces. The RV parking lot would provide 23 RV spaces with space available for one standard vehicle at each RV site, as well as 12 additional standard parking spaces for visitor use. A total of 301 parking spaces would be provided for the hotel and RV Parking component of the proposed project, as detailed in Table 2-7.

Table 2-7 Hotel and Short-Term Visitor Parking Requirements

Use	Required Parking Ratio	Required Number of Parking Spaces	Provided Number of Parking Spaces
Hotel 1	1 space/room	120	124
Hotel 2	1 space/room	109	142
RV Parking	1 space/RV spot	23	35
Total		252	301

2.5.4 Farmers Market, Live Entertainment, and Special Events

The proposed project would include areas to hold a farmers market, live entertainment, and special events to serve the proposed residences and surrounding community. The farmers market would be situated in the parking lot area south of Building Shop 1 and Shop 2 and would occur on weekends from morning until early afternoon. Live entertainment would be situated in the center courtyard of buildings P1 through P4. The events would occur occasionally on Fridays, Saturdays, and/or

Sundays, and would be conditioned to comply with the City of Riverside's Noise Ordinance. Special events would vary throughout the year and would take place in the parking lot area south of Building Shop 1 and Shop 2. An example of a special event would be a demonstration car show, which would not allow the revving of engines, loud stereos, or idling of vehicles. The farmers market and special events situated in the parking lot would be located as to not impact circulation in the parking lots or the on-site roads. The events would occur in the shared commercial parking area, with convenient access for local residents, hotel visitors, and commercial customers.

2.5.5 Green Building Features

A number of green building features are proposed, including on-demand hot water systems, HVAC systems, LED lighting, and individual unit water-use monitoring. Each residential unit would comply with California Building Code standards and be wired for a future electric vehicle charging station. A ride-sharing pick-up point is proposed for residents and people visiting the site to encourage ride-sharing, simplify pick-up and drop-off, and reduce traffic hazards. A package delivery concierge service, with package lockers, would be provided as part of the proposed residential development. This would create a one-stop pick-up and drop-off location for packages, reducing the need for idling delivery trucks throughout the residential development. Lighting for the project would consist of low-energy LED that would comply with City of Riverside lighting standards. Proposed green building features are discussed further in Section 4.5, *Energy Conservation*.

2.5.6 Open Space, Landscaping, and Walls/Fencing

The residential portion of the project would include a combination of private and common open space in accordance with City of Riverside open space requirements. The proposed project includes 55 to 133 sf of private outdoor space for each dwelling unit (averaging 102 sf) in the form of patios or balconies, totaling 48,985 sf. The project would provide 71,240 sf of common outdoor space, equaling 148 sf per dwelling unit. The common open space areas would include low-water landscaping, pools with BBQ areas, seating, decks, and lawn/turf areas for outdoor activities and gathering spaces. Additional shared residential space would include two clubhouses and an approximately 13,000-sf resident-use-only dog park. Common space throughout the commercial and hotel portions of the development would include connected courtyards and public gathering areas with seating and dining tables.

Landscaping throughout the project site would consist of California native, low water use trees, shrubs, and ground cover, as well as various planted accent pots; these are detailed in the plans located in Appendix M. Large trees are proposed on the periphery of the project site, along roadways, within parking lot planters, and throughout the residential common open space areas. Common trees in the landscape plan consist of Chitalpa, Magnolia, California Pepper, Southern Live Oak, Honey Locust, Golden Medallion, and Coast Live Oak. Groundcover, shrubs, and accent plants are proposed along walkways, throughout the residential common open space areas, and in the commercial gathering areas, seating areas, and courtyards. The plans include decorative crosswalks, paving, and seating furniture for the residential and commercial areas.

The project proposes a 6-foot block wall along the northern property line between the residences and church along Strong Street and the project. This would provide some privacy between the proposed multi-family units and the existing single-family residences to the north. The wall would be constructed with masonry block and would provide attenuation for noise from the proposed residential parking lot, detailed in Section 4.10, *Noise*. A decorative 5-foot high steel, tubular fence would be placed near the Orange Street entrance and along the south side of buildings P3 and P4.

Various retaining walls, up to 12 feet, would be constructed around the perimeter of the development. All of the fences and walls would be designed to enhance the aesthetics of the proposed project, while providing security, privacy, and slope stability where needed. The walls and fences would comply with City of Riverside standards. A grading exception is being requested as part of the proposed project, to accommodate the proposed the height of some of the retaining walls.

2.5.7 Freeway Signage

The project would include two pylon signs, with a maximum height of 60 feet from the grade of the adjacent freeway, installed near SR 60 on the south side of the site and along the SR 60/I-215 interchange ramp. The height of the sign along SR 60 could be up to 49.3 feet, and the height of the sign along I-215 could be up to 70.8 feet. The design of the signs would include painted plaster and tile to match the commercial and hotel buildings with metal cladding on top and simple lettering to announce the name of the project. Individual business names would be backlit in a 25-foot portion of the top half of the pylon to be visible to drivers on the freeways. There would be space for six businesses to advertise on each sign.

2.5.8 Parking, Site Access, and On-site Circulation

Parking space allotment for each component of the proposed project is described above. A total of 1,587 parking spaces would be provided for the entirety of the proposed project. No underground parking is proposed.

A driveway on the western boundary of the site, on Orange Street, would provide primary vehicular access to the project site. Future residents would access the site from entrances on La Cadena Drive and at the northern-most driveway along Orange Street. Three gate-controlled entrances, located within the project site, secure the residential component of the project. Commercial patrons and hotel and RV parking visitors would access the site through the driveways along Orange Street.

The main circulation flow would be from a private central roadway, extending from Orange Street to La Cadena Drive. This would be the primary vehicular travel route to access the commercial or residential areas, with a four-way intersection at the center of the site. The majority of the existing concrete-lined channel that traverses the site would be covered by the central roadway and parking spaces.

2.5.9 Utilities

Riverside Public Utilities would provide electric and water utility services to the proposed project site. The City Public Works Department would provide wastewater services. SoCalGas would provide gas service and either the City or a private contractor would provide solid waste disposal. Utility services are discussed in Section 4.14, *Utilities and Service Systems*.

2.5.10 Off-site Improvements

Project implementation would include various off-site construction activities and improvements. Grading within the Caltrans right-of-way would occur during site preparation and grading, as well as for improvements to the Orange Street off-ramp. The work within the Caltrans right-of-way would be subject to Caltrans permitting and environmental review processes. Various other traffic improvement measures would also require off-site improvements, which include installation of

traffic signals, restriping lanes, and proving turn lanes at intersections surrounding the project site. Details of the traffic improvements are in Section 4.12, *Transportation and Traffic*.

2.5.11 Construction and Grading

Construction of the proposed project is expected to occur over approximately two years. Construction activity would comply with the City's Municipal Code Section 7.35.020 and would not operate between the hours of 7:00 PM and 7:00 AM on weekdays, between the hours of 5:00 PM and 8:00 AM on Saturdays, or at anytime on Sundays. Construction activity would consist of phased site preparation and grading, building construction, architectural coating, and paving. The concrete-lined channel that bisects the site would be covered to easily access the southern and northern portions of the project site during grading and construction. Therefore, the first phase of site preparation and grading would include the removal of the open water, concrete channel and the installation of a minimum 98-inch reinforced concrete pipe under the proposed primary roadway. Once the channel is covered, the remainder of the site could be cleared and graded.

Based on the project site's existing topography, grading would require a maximum cut and/or fill of approximately 20 feet. The existing site ranges in elevation from 812 to 877 with a mean elevation of 849.6; the proposed improvements range in elevation from 832 to 866 with a mean elevation of 847.3. The initial estimated quantity of cut and fill are 236,380 cubic yards (cy) and 162,816 cy respectively, giving an initial export volume of 73,564 cy. The soils investigation anticipated shrinkage of 10 percent and subsidence of 0.1 foot. Coupled with the loss of soil from stripping vegetation, removal of existing asphalt/concrete, and export of other deleterious material, it is anticipated that the site would balance. Various retaining walls, up to 12 feet, would be constructed around the perimeter of the development. A grading exception is being requested as part of the proposed project to allow for the retaining walls that exceed 6 feet.

The second phase of site preparation and grading activity would include establishing building pads and preparing for building construction. Construction equipment for the project would include tractors, bulldozers, graders, and scrapers for the site preparation and grading, and cranes, forklifts, welders, rollers, and other paving equipment for building construction and paving.

2.6 Project Objectives

The proposed project intends to achieve the following objectives:

- Increase the type and amount of housing available consistent with the goals of the City's Housing Element
- Increase the number of hotel rooms in the City
- Respond to a growing need of RV parking for short-term visitors
- Provide amenities for the surrounding neighborhood in the form of a commercial center with provisions for a farmers market, live entertainment, and special events
- Use land resources more efficiently by providing a well-planned, infill development on a currently vacant site
- Create a mixed-use development consistent with the City's Smart Growth principles
- Increase commercial, retail, and restaurant space in the City

2.7 Required Approvals and Consultation

The project would require the following City approvals and entitlements, along with standard building and grading permits:

- 1 **General Plan Amendment (GPA)** to amend approximately 34.34 acres of the proposed project area from MDR – Medium Density Residential and O – Office to MU-U – Mixed Use Urban and amend approximately 1.06 acres of the area for the proposed vehicle fueling station from O – Office to C – Commercial
- 2 **Zoning Code Amendment (RZ)** to Rezone approximately 34.34 acres of the proposed project area from R-1-7000 Single Family Residential, R-3-1500 – Multi-Family Residential, and R-1-7000-WC – Single Family Residential – Watercourse Overlay Zones to MU-U – Mixed Use Urban and amend 1.06 acres of the area proposed for the vehicle fueling station from R-1-7000 – Single Family Residential to CR – Commercial Retail
- 3 **Site Plan Review (PPE)** for the proposed site design and building elevations, with the exception of the vehicle fueling station
- 4 **Tentative Parcel Map (PM)** to subdivide the project site into 15 parcels, ranging in size from 0.49 acres to 7.67 acres, including a private street
- 5 **Conditional Use Permits (CUP)** to permit each of the following uses: Hotels and RV parking, vehicle fueling station, drive-thru restaurant, live entertainment and special events, and a farmers market
- 6 **Design Review (DR)** for the proposed vehicle fueling station site design and building elevations
- 7 **Grading Exception (GE)** to allow retaining walls over permissible height limits
- 8 **Minor Conditional Use Permit (MCUP)** for two freestanding, freeway-oriented monument signs
- 9 **Environmental Impact Report (EIR)** to analyze the potential environmental impacts of project implementation

The project would require the following permits from federal and state agencies, as indicated:

- **Regional Water Quality Control Board:** Clean Water Act Section 401 Water Quality Standards Certification for potential impacts to water quality within and downstream of the on-site concrete-lined channel and soft bottom drainage
- **California Department of Transportation (Caltrans):** Encroachment Permit to allow grading in Caltrans right-of-way and for the expansion of the westbound, Main Street off-ramp to include a right-turn-only lane
- **California Department of Fish and Wildlife:** Streambed Alteration Agreement per California Fish and Game Code Section 1600 to develop mitigation, minimization, and avoidance measures for potential impacts to the on-site concrete-lined channel and soft bottom drainage
- **U.S. Army Corps of Engineers:** Section 404 Clean Water Act Permit to develop mitigation, minimization, and avoidance measures for proposed impacts to the on-site concrete-lined channel

The project would require the following consultation processes in order to move forward with the project:

- **Senate Bill (SB) 18 and Assembly Bill (AB) 52:** Pursuant to SB 18, consultation with California Native American Tribes on the contact list maintained by the California Native American Heritage Commission is required due to the proposed General Plan amendment. Also, pursuant to AB 52, the project would be required to notify and consult with local tribes who requested notification from the City for projects subject to CEQA. Two tribes requested consultation under AB 52: the Morongo Band of Mission Indians and the Rincon Band of Luiseño Indians. Copies of the tribal notifications are included in this EIR as Appendix I.
- **SB 610:** The project meets the criterion that requires the preparation of a water supply assessment (WSA). Consultation between the City and applicant was required to prepare a WSA. The findings of the WSA have been incorporated into Section 4.14 of this EIR. The WSA is included in this EIR as Appendix N.
- **Determination of Biologically Equivalent or Superior Preservation:** Impacts to riparian/riverine resources require the preparation of a Determination of Biologically Equivalent or Superior Preservation (DBESP) report. The findings and recommended mitigation measures of the DBESP required consultation with the United States Army Corps of Engineers, California Department of Fish and Wildlife, and Riverside Conservation Authority. The findings and recommended mitigation measures have been incorporated into Section 4.3 of this EIR. The DBESP is included in this EIR as Appendix Q.

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. Detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4.0, *Environmental Impact Analysis*.

3.1 Regional Setting

The proposed project site is located in Riverside County, in the City of Riverside (City), approximately 1.3 miles north from the downtown core. Figure 1-1 in Section 1, *Introduction*, shows the project's regional location. The City encompasses approximately 81 square miles and is located approximately 50 miles east of downtown Los Angeles, and 9 miles south of San Bernardino. Currently the City is the 11th most populous city in California and has the largest employment base in the Inland Empire region. Riverside has three universities and a community college system, giving the City a large student population.

A grid system of east-west and north-south roadways, including arterials, collectors, and local streets provide circulation throughout the City. The project site is located in an area with easy vehicular access to downtown Riverside, and regional access from major highways adjacent to the site. Orange Street, Main Street, and Market Street are the major roadways around the project. State Route 60 (SR 60) and Interstate 215 (I-215) are located adjacent to the project. Figure 2-1 in Section 2.0, *Project Description*, shows the project site in relationship to the surrounding neighborhood.

The region is characterized by a semi-arid climate with hot and dry summers and relatively mild, wet winters. The region has very poor air quality due to the air patterns and setting that bring air pollution from the Los Angeles area. The region has made improvements with public transit and air quality regulations, but the area is still in nonattainment for ozone and particulate matter.

3.2 Project Site Setting

The approximately 35.4-acre project site is located in the northwestern section of the City, and is bounded by Orange Street to the west, Strong Street to the north, SR 60 to the south and I-215 to the east. The project site comprises seven parcels with the following assessor parcel numbers: 209-151-029, 209-151-036, 209-020-022, 209-020-047, 209-020-048, 209-020-059, 209-020-060, 209-020-061, 209-020-062, 209-060-023, 209-060-027, 209-060-029, and 209-070-015.

The site has General Plan Land Use designations of O – Office and MDR – Medium Density Residential; it has zoning designations of R-1-7000 - Single Family Residential, R-3-1500 – Multiple Family Residential, and R-1-7000-WC – Single Family Residential and Water Course Overlay.

Single-family residences are situated along Orange and Strong streets to the north and west of the project site. Fremont Elementary school is located west of the project site, across Orange Street. Calvary Baptist Church is located immediately north of the site. Commercial uses occur to the southwest of the site across the SR 60 Freeway.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed project. CEQA defines “cumulative impacts” as two or more individual impacts that are substantial or will compound other environmental impacts, when considered together. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be less than significant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and gauge the effects of a series of projects more accurately.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Table 3-1 lists currently planned and pending projects in Riverside and surrounding areas, including in Riverside County, Jurupa Valley, and Colton. The cumulative project list was developed in the Traffic Impact Analysis (TIA), and created in consultation with the City of Riverside Planning and Public Works staff. The TIA is included as Appendix L. The TIA followed the City of Riverside’s TIA Preparation Guide, which recommends a 5.0-mile radius for the study area. The cumulative list also included projects anticipated to contribute measureable traffic impacts to the study area. Overall, the cumulative projects are proposing:

- 20 residential projects totaling 2,422 dwelling units
- 7 warehousing projects totaling 2,582,064 square feet
- 20 commercial, office, and light industrial projects totaling 701,843 square feet
- 19.5 acres of parkland
- 2 schools
- 1 hotel with 239 rooms

These projects are considered in the cumulative analyses in Section 4.0, *Environmental Impact Analysis*.

Table 3-1 Cumulative Projects List

Project No.	Project Location or Name ¹	Land Use	Quantity
City of Riverside			
1	3667 Placentia	Warehouse	308,000 sf
2	3444 Center	Single-family	61 du
3	978 Orange Street	Single-family	5 du
4	1006 and 1008 Clark Street	Single -family	15 du
5	4253 Fairgrounds Street	Warehouse	15,000 sf
6	3719 Strong Street	Single-family	9 du
7	APN 271-060-003, 012	Single-family	9 du
8	APN 249-033-008	Vehicle Repair	3,008 sf

Project No.	Project Location or Name ¹	Land Use	Quantity
9	1080 Marlborough Avenue	Warehouse	54,450 sf
10	APN 249-130-0222	Office	8,980 sf
11	901 Marlborough Avenue	Light Industrial	40,946 sf
12	Palmyrita and Michigan Avenue	Warehouse	1,461,449 sf
13	2234 Main Street	Gas Station	4,946 sf
14	2450 Market Street	Senior Housing	67 du
15	1695 Spruce	School	6,647 sf, 500 students
16	2625 Durahart	Warehouse and Manufacture	149,875 sf
18	3105 Market Street	Residential	165 du
		Commercial	22,000 sf
19	3280 Vine	Storage	18,513 sf
20	3530 Fairmont and 3555 Market Street	Hotel	239 Rooms
21	3605 Market Street	Restaurant	15,500 sf
22	3650 Market Street	Residential	165 du
		Commercial	22,000 sf
23	360 Alessandro Blvd.	Office	9,148 sf
24	3700 Main Street	Church	9,349 sf
25	3870 Main Street	Residential	35 du
		Commercial	5,684 sf
26	3393 Mission Inn Avenue	Affordable Housing	72 du
		Office	5,400 sf
		Museum	3,700 sf
27	3372 University Avenue	Office	132,136 sf
28	Between Mission Inn Ave and 9 th Street	Apartments	275 du
29	750 Marlborough	Warehouse	346,290 sf
30	Northside	Specific Plan	N/A
County of Riverside			
31	TR28957	Single-family	36 du
32	TR36668 (Bixby Highgrove)	Single-family	201 du
33	PP25505 (Truck Sales Facility)	Office	7,952 sf
34	CUP 03718	Light Industrial	19,988 sf

City of Riverside
The Exchange Project

Project No.	Project Location or Name ¹	Land Use	Quantity
35	PP24798	Commercial	2,400 sf
		Office	3,405 sf
		Laundromat	2,961 sf
36	PP25482	Office	2,632 sf
City of Jurupa Valley			
37	Market Street Commercial	Gas Station and restaurants	13,558 sf
38	Northtown Housing Development	Affordable Housing	68 du
		Commercial	31,375 sf
39	Rubidoux Commercial Development	Office	306,894 sf
40	New Rio Vista Specific Plan	Single-family	1,239 du
41	Emerald Ridge North	Single-family	184 du
42	Emerald Ridge South	Single- and Multi-family	215 du
City of Colton			
43	Roquet Ranch	Residential	887 du
		School	10.3-acre site, unknown sf, 600 students,
		Commercial	12,000 sf
		Park	19.5 acres
44	Center Street Development	Warehouse	247,000 sf

¹ Cumulative project details were sourced from the Traffic Impact Study prepared for the project by Urban Crossroads, September 2018 (see Appendix L).

Notes: sf = square feet, du = dwelling units