

## 5 Other CEQA Required Discussions

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This section analyzes potential irreversible environmental effects and growth-inducing impacts of the proposed mixed-use project. Energy impacts are addressed in Section 4.5, Energy Conservation.

### 5.1 Irreversible Environmental Effects

Section 15126.2(c) of the CEQA Guidelines requires EIRs to contain a discussion of significant irreversible environmental changes which would be caused by the proposed project should it be implemented. This section addresses the use of non-renewable resources during initial and continued phases of the project, the commitment of future generations to environmental changes or impacts because of the proposed project, and any irreversible damage from environmental accidents associated with the proposed project.

#### 5.1.1 Use of Non-Renewable Resources

The proposed project involves infill development on a vacant lot. Construction of the project would involve an irreversible commitment of construction materials and non-renewable energy resources. The project would involve the use of building materials and energy resources, some of which are non-renewable, to construct the 482 residential units, 49,000 square feet of retail commercial, 130,000 square feet of hotels, and 23 RV parking spaces, not including parking areas for the residential, commercial, and hotel uses. Consumption of these resources would occur with any development of the project site, and are not unique to the proposed project.

Operation of the proposed project would irreversibly increase local demand for non-renewable energy resources, such as petroleum products and natural gas. Increasingly efficient building design, however, would offset this demand to some degree by reducing energy demands of the project. The project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Green Building Standards Code functions to:

- Reduce greenhouse gas (GHG) emissions from buildings
- Promote environmentally responsible, cost-effective, healthy places to live and work
- Reduce energy and water consumption
- Respond to the environmental directives of the administration

The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. With adherence to these standards, the project would not use unusual amounts of energy or construction materials, and impacts related to consumption of non-renewable and slowly renewable resources would be less than significant. Consumption of these resources would occur with any development of the project

site, and would not be unique to the proposed project. Section 4.5, Energy Conservation, includes a discussion of the potential energy consumption and/or conservation impacts of the project.

### 5.1.2 Commitment of Future Generations

Approval of the proposed project would result in environmental changes or impacts that commit future generations to new environmental circumstances. Primarily, the approval of the proposed project would change the underlying General Plan 2025 land use and zoning designations of the project site, as detailed in Section 4.9, Land Use and Planning. The change in the underlying regulations would allow for a higher density mixed-use commercial and residential development than the site permits currently. This would result, in turn, in an increase in population not accounted for in the City's General Plan 2025. However, Sections 5.2.1 and 5.2.2 discuss how the increase in population from the proposed project would be minimal compared to projected growth in the City. The proposed project has been designed to meet the intent of the proposed revision General Plan 2025 land use designation and zone, and no variances to the development standards are requested.

The project would result in a permanent increase in traffic and vehicle trips on local roadways and cause a number of intersections to operate at unacceptable levels. Section 4.12, Transportation and Traffic, concludes long-term impacts associated with the proposed project would be less than significant with the payment of development impact fees and the fair share contribution to for the necessary intersection and roadway improvements.

The project would also require an irreversible commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in the Initial Study (Appendix A) and in Section 4.15, Impacts Found to be Less Than Significant, impacts to these services and systems would not be significant.

Similarly, as discussed in Section 4.3, Biological Resources, Section 4.4, Cultural Resources, Section 4.12, Transportation and Traffic, and Section 4.13, Tribal Cultural Resources, potentially significant impacts to biological, cultural, and tribal resources, and impacts from increased traffic would be reduced to less than significant with implementation of mitigation measures.

### 5.1.3 Unavoidable Impacts

CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes the proposed project would result in a significant and unavoidable impact to air quality, GHG emissions, and noise.

As discussed in Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions, construction and operation of the project would generate air quality and GHG emissions in excess of applicable thresholds. Most air quality concerns and GHG emissions come from mobile sources. Although the proposed project would implement mitigation to reduce air quality impacts and GHG emissions, impacts would remain significant and unavoidable due to the inability of the project to reduce tailpipe emissions from the increase in traffic. Because the project would exceed operational air quality thresholds, the project could result in an increase in frequency or severity of air quality violations or contribute to new violations which would conflict with implementation of the Air Quality Management Plan (AQMP). As there are no feasible mitigation measures, impacts would be significant and unavoidable.

As discussed in Section 4.12, Transportation and Traffic, traffic generated by the project along with cumulative development in the area would result in impacts to Intersection #6 at Main Street and

Russell Street. The installation of a traffic signal and access restrictions at this location are infeasible, and impacts would be significant and unavoidable.

## 5.2 Growth Inducement

Section 15126.2(d) of the CEQA Guidelines requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

### 5.2.1 Population Growth

The project would involve the development of multi-family residences, retail and restaurant spaces, two hotels, and a vehicle fueling station. These uses could cause increases in Riverside's population.

The multi-family residential portion of the project proposes 482 residential units. Using the average City household size of 3.18, the residential portion of the project would create a population growth of approximately 1,532 persons (California Department of Finance 2018). This is a conservative estimate as the multi-family units include one- and two-bedroom units that would likely have a lower household size than the average.

Indirect population growth would occur from the commercial uses of the project, assuming all new employees relocate to Riverside. As described in Section 4.2, *Air Quality*, the project would generate the need for approximately 115 new employees. Based on the household size above and assuming all employees and families relocated to the City, the commercial uses would add 365 persons to the City population.

Implementation of the project could add 1,897 new people to the City. According to the Southern California Association of Governments (SCAG) 2016 RTP/SCS, the City's population is estimated to increase to 386,600 by 2040, 60,740 more persons than the current population (SCAG 2016). The population increase from the project represents 2.8 percent<sup>1</sup> of the total anticipated population growth of the City through 2040. A population growth of 1,897 could be accommodated, therefore, under the City's current growth projections.

### 5.2.2 Economic Growth

The proposed project would generate temporary employment opportunities during construction. Because workers would be expected to come from the existing regional work force, construction of the project would not be growth-inducing from a temporary employment standpoint.

The proposed project would also add long-term employment opportunities associated with operation of the commercial buildings and hotels. Table 5-1 shows the potential increase in job opportunities from implementation of the proposed project.

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<sup>1</sup> 1,897 project residents / 60,740 anticipated population growth = 2.8 percent of total anticipated population growth

**Table 5-1 Employment Increase Resulting from Proposed Project**

Land Use	Employees per Square Foot	Proposed Square Footage	Total Employees
Other Retail/Services	1/629 sf	49,000	78
Hotels	1/3,476 sf	130,000	37
Total			115

Source: SCAG 2001

SCAG's 2016 RTS/SCS forecasts 432,500 jobs will be added to the City between 2015 and 2040 (SCAG 2016). The 115 jobs anticipated to arise from the proposed project's commercial and hotel development would be less than 0.1 percent of job growth estimated during 2012 and 2040 and, therefore, would be well within employment forecasts.

The proposed project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with any future development in or around Riverside would be addressed as part of the CEQA environmental review for each of those development projects.

### 5.2.3 Removal of Obstacles to Growth

The proposed project is located in a fully urbanized area well served by existing infrastructure. As discussed in Section 4.14, Utilities and Service Systems, existing water and wastewater infrastructure would be adequate to serve the project. Minor improvements to water, sewer, and drainage connection infrastructure would be needed, but would be specifically sized to serve the proposed project.

The project would require roadway improvements and expansion of freeway off ramps, as detailed in Section 4.12, Transportation and Traffic, to accommodate additional traffic levels resulting from the project. However, these roadway improvements would not present a significant change to the City's traffic circulation system. Improvements to existing intersections would also be required, including the installation of traffic signals and provision of turn lanes, through transportation mitigation detailed in Section 4.12, but these improvements would not affect the potential for significant economic or population growth. The project constitutes infill development in an urbanized area and does not require the extension of new infrastructure through undeveloped areas.

## 5.3 Energy Effects

Public Resources Code Section 21100(b)(2) and Appendix F of the CEQA Guidelines require that EIRs include a discussion of the potential energy consumption and/or conservation impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, or unnecessary consumption of energy. Section 4.5, Energy Conservation, includes a discussion of the potential energy consumption and/or conservation impacts of the project.

## References

- California Department of Finance. 2018. E-1 Population Estimates for Cities, Counties, and the State – January 1, 2018 and 2018. [dataset]. May 2018.  
<http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/>. (Accessed August 2018).
- Southern California Association of Governments (SCAG). 2001. Employee Density Study Report. Prepared by The Natelson Company. Los Angeles, CA. October 31, 2001.
- , 2016. Final Growth Forecast Appendix: Regional Transportation Plan 2016-2040 Sustainable Communities Strategy: Towards a Sustainable Future. Los Angeles, CA. April 2-16.

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## 6 Alternatives

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As required by Section 15126.6 of the CEQA Guidelines, this Environmental Impact Report (EIR) examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives, but would avoid or substantially lessen at least one of the significant adverse impacts.

As discussed in Section 2.0, Project Description, the objectives for the proposed project, are as follows:

- 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 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

Included in this analysis are four alternatives, including the CEQA-required "no project" alternative, that involve changes to the project that may reduce project-related environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project Alternative
- 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

Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed briefly in Sections 6.1 through 6.4.

### 6.1 Alternative 1: No Project Alternative

#### 6.1.1 Description

The No Project Alternative assumes the proposed 482 residential units, 49,000 square feet of commercial space, two hotels, RV parking, and associated roadways and parking lots are not constructed. The currently 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. This alternative has no characteristics in common with the proposed project nor any of the alternatives, as no proposed development would occur.

## 6.1.2 Impact Analysis

### a. Aesthetics

The project site is currently undeveloped with remnants of previous, single-family dwellings and a concrete storm drain under the control of Riverside County Flood Control and Water Conservation District. Under the No Project Alternative, the site would remain undeveloped. There are no other projects proposed for the site, but it is reasonable to assume another project would be developed on the project site in the future. Assuming that the project site remains vacant, there would be no commercial or residential structures constructed and therefore, no views would be blocked from the area roadways and adjacent properties. There would be no change in light or glare at the site, no structures or vehicles would be in place to create these impacts. Therefore, no impacts to views or light-sensitive uses would occur in the surrounding area. Under the No Project Alternative, the site would continue to be an unmaintained, vacant lot with periodic trash dumping and homeless encampments that could appear unsightly to the surrounding neighborhood. No aesthetic impacts concerning views, light, or glare would occur, and impacts would be **less than** those associated with the proposed project.

### b. Air Quality

As discussed in Section 4.2, Air Quality, the proposed project would generate emissions during construction and operational activities. Construction emissions would be reduced to less than significant levels with the implementation of mitigation measures, but operational emissions would result in significant and unavoidable impacts due to the number of vehicle trips generated by the project. There would also be less than significant impacts from toxic air contaminants (TAC) on sensitive receptors in the proposed project from the adjacent freeways. Under the No Project Alternative, there would be no development or generation of additional vehicle trips in the area. Therefore, there would be no emissions from construction or operation activities. This Alternative would also not have any site sensitive uses adjacent to highways that emit TACs. The No Project Alternative would impact air quality **less than** the proposed project.

### c. Biological Resources

As detailed in Section 4.3, Biological Resources, 43 special-status plant and 59 special-status animal species are known to or have to potential to occur in the vicinity of the project site. One plant habitat type is found on the project site: Wild Oats Grassland, an annual non-native grassland. The project site is heavily disturbed. The level of disturbance and lack of native habitat means only species found in urban areas or in areas with a high level of disturbance from development and invasive species have the potential to occur on the site. Therefore, no special-status plants have the potential to occur on the site. Eight special-status wildlife species are known to occur in the vicinity in habitat types that also occur on the project site. Two of the special-status species, Cooper's Hawk and Burrowing Owl, were determined to have high potential for occurrence on the site.



There are two on-site jurisdictional water features, 0.3 acres of which are under the jurisdiction of U.S. Army Corps of Engineers, subject to Section 404 of the Clean Water Act, and meet the Western Riverside Habitat Conservation Plan (MSHCP) criteria for burrowing owl. The development of the proposed project could impact these features on the site. With the implementation of mitigation measures BIO-1a, BIO-1b, BIO-2, BIO-3, and BIO-4, impacts to biological resources would be reduced to less than significant levels.

Under the No Project Alternative, the project would not involve construction or the development of the site. Therefore, no impacts would occur to any special-status species, water features, or habitat corridors that currently exist on-site. No mitigation measures would be necessary and the No Project Alternative would impact biological resources **less than** the proposed project.

#### **d. Cultural Resources**

As described in Section 4.4, Cultural Resources, there could be impacts to cultural and paleontological resources during construction and ground-disturbing activities that could unearth and impact unidentified resources adversely. Implementation of mitigation measures CR-1 through CR-4 would reduce these impacts to less than significant. Under the No Project Alternative, construction or ground-disturbing activities would not occur, which would eliminate potential impacts to previously unidentified archaeological resources, paleontological resources, and human remains. Therefore, implementation of mitigation measures would not be required and impacts would be **less than** under the proposed project.

#### **e. Energy Conservation**

Under the No Project Alternative, the site would remain vacant and there would be no use of electricity, natural gas, or petroleum in the construction or operation of the project. As discussed under Section 4.5, Energy Conservation, the proposed project would utilize electricity, natural gas, and petroleum in the construction and operation of the development. The proposed project would have a less than significant impact on wasteful energy consumption, and would not conflict with existing energy standards or place significant demand on local energy supplies. The No Project Alternative would not utilize any energy resources and impacts related to energy conservation would be **less than** the proposed project.

#### **f. Geology and Soils**

Under the No Project Alternative, there would be no ground disturbance in the project site. Consequently, there would be no potential for the loss of topsoil or soil erosion. The No Project Alternative would not result in the construction of facilities in a seismically active area. There would not be any potential for impacts to surrounding structures or people. Therefore, although the proposed project would not increase geologic hazards, impacts associated with geology and soils under the No Project Alternative would be **less than** those associated with the proposed project.

#### **g. Greenhouse Gas Emissions**

As detailed in Section 4.7, Greenhouse Gas Emissions, construction of the proposed project would generate greenhouse gas (GHG) emissions during the construction and operation of the project. Total GHG emissions would exceed per capita thresholds even with the implementation of mitigation measure AQ-3 and AQ-4 and result in a significant and unavoidable impact. While the proposed project would meet a majority of the applicable measures in the City's Climate Action Plan, because it proposes a different land use and a greater development density, it would result in

a significant and unavoidable impact to the GHG reduction plan. The No Project Alternative would not include development on-site and would not generate any construction or operational GHG emissions. Therefore, impacts to GHG emissions under the No Project Alternative GHG emissions would be **less than** those of the proposed project.

#### **h. Hydrology and Water Quality**

As discussed in 4.7, Hydrology and Water Quality, the proposed project would potentially increase erosion and stormwater runoff, increase impervious surfaces, and change the drainage pattern of the site. Compliance with federal and state regulations, the development of a detention chamber, and the provisions of landscaped areas would reduce these impacts to less than significant. Under the No Project Alternative, there would be no increase in runoff or changes to local or area-wide drainage patterns, and no impacts to groundwater or surface water. Therefore, impacts would be **less than** under the No Project Alternative.

#### **i. Land Use and Planning**

Under the No Project Alternative, the project site could remain vacant, but would likely be developed by a different project in the future. As there are no other projects proposed currently for the site, this analysis assumes the site will continue to remain vacant in the future. With the site remaining vacant, no potential conflicts with any applicable land use plans and policies or habitat conservation plan would occur under this alternative. Development under the proposed project would require approval of General Plan and Zoning Amendments for the increase development density and mixed uses. Upon approval of these entitlements, the proposed project would comply all applicable land use plans and policies and impacts would be less than significant. Nevertheless, impacts to land use and planning would be **less than** under the No Project Alternative compared to the requirements necessary to develop the proposed project.

#### **j. Noise**

Since the No Project Alternative would not include any form of development or use of the site, it would have no impact related to construction or operational noise. Although the proposed project's impacts related to temporary construction and vibration and long-term operation would be less than significant with the implementation of mitigation measures N-1 through N-3, the No Project Alternative's noise impacts would be **less than** those of the proposed project.

#### **k. Recreation**

The City is currently below standards for recreational facilities. The proposed project would add approximately 2,110 people to the City who would use and impact already overused recreational facilities. Impacts would be reduced to less than significant by providing on-site open space and paying park impact fees. The No Project Alternative would not construct housing units or provide jobs through commercial development, so there would be no people added to the City. The No Project Alternative would impact recreation facilities **less than** the proposed project.

#### **l. Transportation and Traffic**

Under the No Project Alternative, transportation and traffic would remain at current conditions. Temporary traffic associated with construction activities, the increase in average daily trips from the operation of the project, and the impacts to surrounding intersections would be eliminated.

Therefore, overall traffic impacts under the No Project Alternative would be **less than** impacts under the proposed project.

### **m. Tribal Cultural Resources**

Construction of the proposed project would involve ground-disturbing activities with the potential to unearth or adversely impact previously unidentified tribal cultural resources. Implementation of mitigation measure CR-1 through CR-4 would reduce potential impacts to less than significant. However, the No Project Alternative would have no ground-disturbing activities and there would be no potential for adversely impacting tribal cultural resources. The No Project Alternative would have **less** impact than the proposed project.

### **n. Utilities and Service Systems**

As there would be no development on the site, no impact to utilities or service systems would occur under the No Project Alternative. As discussed in Section 4.14, Utilities and Service Systems, proposed development in the project area would increase water demand. Based on the water demand projections in the City, projected water supplies are sufficient to meet the projected water demand of the proposed project. Nevertheless, the No Project Alternative's impact would be **less than** the proposed project as there would be no increase in water demand.

## **6.2 Alternative 2: Develop the Site Pursuant to Current Underlying Zoning**

### **6.2.1 Description**

This discussion analyzes alternative development of the site that remains in accord 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 project proposes General Plan and Zoning Code Amendments to amend the land use designation and zone of the site to a Mixed-Use Urban and Commercial and Mixed-Use Urban and Commercial Retail zoning designation. This change would allow for the desired increased 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 four acres of the site would remain undevelopable due to the Riverside County Transportation Commission (RCTC) easement; they could be left vacant or converted to open space.

Alternative 2 and the proposed project share the common goal of developing residential units, including multi-family. Alternative 2 varies from the other alternatives by removing all commercial development and changing the overall site plan of the project site. The site would be developed solely with residential uses, predominantly low-density residential, which would change the vehicular circulation and flow of the site.

## 6.2.2 Impact Analysis

### a. Aesthetics

The current project alters the visual character of the site by introducing multi-story buildings and a variety of land uses on a vacant lot. The project proposes multi-family residential structures up to 42 feet, 2 inches, single-story commercial structures up to 39 feet, 6 inches, and two 64-foot tall hotels. Based on the visual simulations and project plans, the development would introduce new sources of light and glare, and it would impact the visual character looking toward hills in the distance.

Development under Alternative 2 would reduce the size and intensity of the development consistent with the surrounding uses. The single-family residential portion of the site would be limited to 35 feet in height, and the multi-family would be limited to 30 feet, 7 to 30 feet less than the proposed project. Light and glare impacts would be similar to the proposed project, though reduced in intensity and frequency. Aesthetics would still be impacted by development of the site as Alternative 2 would propose new development on a vacant lot. Overall, it is anticipated that Aesthetic impacts under Alternative 2 would be **less than** the proposed project.

### b. Air Quality

Construction air quality impacts would be similar to the proposed project during site grading and paving. Emissions related to building construction would be reduced due to the reduction in size and intensity of the project. Similarly, reactive organic gas emissions would be reduced due to the smaller building area of the project under Alternative 2; mitigation measures would not be needed to reduce impacts. Operational air quality impacts would be reduced through a reduction in trip generation from removing the commercial uses, hotels, and retail components, as well as reducing the number of residential units by 222.

Impacts related to TACs from the nearby major freeways would be similar under Alternative 2, as there would still be the placement of sensitive receptors near the freeways. Overall, it is anticipated that Air Quality impacts under Alternative 2 would be **less than** the proposed project.

### c. Biological Resources

Developing the site under the current land use regulations would still require site preparation and grading on an undeveloped area that could still potentially impact burrowing owls, the two on-site water channels, nesting birds, and a small area of non-wetland waters protected under the Clean Water Act. Since development under Alternative 2 would be less dense than under the proposed project, there would be potential for areas with biological resources to be preserved. However, the site would still undergo overall site preparation and would still require the implementation of mitigation measures Bio-1 through Bio-4. Therefore, it is anticipated that Biological Resources impacts under Alternative 2 would be **similar** to the proposed project.

### d. Cultural Resources

Alternative 2 would propose developing the vacant site with approximately 173 single-family residents and 87 multi-family units. Ground-disturbing activities, such as grading and surface excavation, would also occur under Alternative 2 with the potential to unearth and impact unidentified archaeological resources, paleontological resources, and/or human remains. As with the proposed project, the implementation of mitigation measures CR-1 through CR-4 would be

necessary to reduce impacts to less than significant. It is anticipated that impacts under Alternative 2 would be **similar** to the proposed project.

#### **e. Energy Conservation**

Energy supplies under Alternative 2 would still be supplied by Riverside Public Utility and SoCalGas for electricity and natural gas. It is anticipated that construction fuel consumption under Alternative 2 would be less than the proposed project for construction equipment, vendor trips, and worker trips because of the reduced building area and size of the project. Moreover, the electricity and natural gas consumption would be less than under the proposed project due to the elimination of commercial, gas station, restaurants, and hotel uses, and the reduction in the number of residential units. Similarly, the gas consumption for the operation of the project would be reduced since the estimated annual vehicles miles travelled would be fewer than the proposed project.

Development under Alternative 2 would also be required to comply with all applicable energy conservation standards. Since this Alternative would develop more single-family residences rather than multi-family residences, there would also be the potential to incorporate energy conservation measures, such as solar panels, more easily than under the proposed project. Energy Conservation impacts under Alternative 2 would be **less than** the proposed project.

#### **f. Geology and Soils**

The geology and soils of the site would not change between the proposed project and Alternative 2. While Alternative 2 would include 222 fewer housing units than the proposed project, the geologic hazards would remain the same. 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. Alternative 2 would place fewer residents in an area with substantial potential for soil collapse due to the reduction in housing units. However, the impacts would remain the same and recommendations contained in the geotechnical report would still be required as mitigation. Impacts from geology and soils under Alternative 2 would be **similar** to the proposed project.

#### **g. Greenhouse Gas Emissions**

Similar to air quality impacts, GHG emissions related to construction would be reduced, as total building square footage would be less than the proposed project, possibly resulting in a shorter construction period. Grading and paving impacts would be similar to the proposed project. Operational GHG Emissions impacts would be reduced primarily through a reduction in trip generation as a result of removing the proposed commercial component and reducing the total number of dwelling units by 222. Using CalEEMod assumptions based on the number and type of residential units proposed under Alternative 2, there would be approximately 7,546,121 annual vehicle miles traveled (VMT), or 16,058,961 fewer VMT than the proposed project. The overall GHG emissions would likely result in less than significant impacts under Alternative 2, as the proposed project creates significant and unavoidable impacts. Therefore, it is anticipated that direct GHG Emissions impacts under Alternative 2 would be **less than** the proposed project.

#### **h. Hydrology and Water Quality**

Under Alternative 2, grading and construction activities associated with the project could still potentially impact water quality similar to the proposed project due to erosion resulting from exposed soils. The project would still involve construction over one-acre and be subject to National

Pollutant Discharge Elimination System construction permit to implement best management practices (BMP) to minimize erosion and construction pollutant transport. Similarly, Alternative 2 would place housing and structures within a one percent annual flood zone in a portion of the site. The project would be required to comply with applicable flood hazard regulations and design the BMPs to mitigate the 1 percent-annual chance-flood event as the proposed project. Alternative 2 would also alter the existing drainage pattern on the site and be required to capture and treat all on-site stormwater runoff. The drainage channel would still need to be covered and thus would require the implementation of mitigation measures BIO-3 and BIO-4.

Development under Alternative 2 would still increase the amount of impervious surface that exist on the vacant site, but would be less than under the proposed project. Development standards under the current zoning provide for 20-foot front setbacks, 7.5 to 10-foot side setbacks, and 25-foot rear setbacks under the R-1-7000 zone; and 15-foot front setbacks, 7.5 to 10-foot side setbacks, and 15-foot setbacks under the R-3-1500 zone. Traditionally, these areas include pervious surfaces and vegetation and would allow for groundwater recharge, effectively reducing the number of low-impact development BMPs required under Alternative 2. Overall, it is anticipated that Hydrology and Water Quality would be impacted due to the existing nature of the site. However, impacts under Alternative 2 would be **less** due to the reduced amount of development intensity and impervious surfaces on the site.

#### **i. Land Use and Planning**

Alternative 2 would not divide an established community and would comply with all land use regulations applicable to the site, compared to the project that proposes an overall change in the land use to construct the mixed-use development and 482 residential units. Under Alternative 2, there would be no need for General Plan or Zoning Code Amendments. Due to the development on an undeveloped area in the MSHCP area, conflicts with the MSHCP would be similar and mitigation measures still required. It is anticipated that Land Use and Planning impacts under Alternative 2 would be **slightly less than** the proposed project.

#### **j. Noise**

This Alternative would have 222 fewer residential units and no commercial or hotels. Construction duration and noise generated would effectively be the same as the proposed project. Pursuant to Riverside Municipal Code (RMC) 7.35.020(G), noise sources associated with permitted construction, repair, remodeling, or grading of any real property are exempt from the interior and exterior noise standards. Vibration impacts from the construction equipment would be similar to the proposed project.

Noise on local roadways from traffic generated under this Alternative would be reduced as the number of trips would be lower under Alternative 2. Operation under Alternative 2 would contribute to an increase in ambient noise levels in the area. However, since this alternative would have fewer residential units and no commercial or hotel uses, the increase would be reduced compared to the project, and would be similar to the surrounding single-family residences. Also, the exterior noise level at the surrounding sensitive receptors would be lower under the operation of this alternative, and the development of a solid sound barrier wall may not be necessary. Therefore, it is anticipated that Noise impact under Alternative 2 would be **less than** the proposed project.

## k. Recreation

Under Alternative 2, the 260 residential units would generate a population increase of approximately 826 persons. This would result in more people using and needing recreational facilities in the City. However, compared to the proposed project, Alternative 2 would reduce the population increase by about 1,000 people, which would reduce the number of people putting pressure on the already over-used recreational facilities in the area. Therefore, direct impacts to recreational facilities would be reduced under this Alternative. The City would still have a shortage of parkland under Alternative 2 (1.8 acres per 1,000 residents, where three acres is required). Therefore, any population increase would have the potential to impact recreational facilities in the City. This Alternative would be subject to applicable park development fees that the City would use to offset impacts by the project and develop parkland to meet future demands. This alternative could include an open space/passive recreational space in a leased land area that could further reduce impacts. Overall, it is anticipated that recreation impacts under Alternative 2 would be **less than** the proposed project.

## l. Transportation and Traffic

Transportation and traffic would still be impacted under Alternative 2, as development of residential units on an existing undeveloped property would increase traffic on local roadways over existing conditions. However, this Alternative would greatly reduce the trips generated by the project and therefore, reduce its impact on local roadways and intersections. It is possible the significant reduction in trips generated under Alternative 2 could eliminate the need for most of the mitigation measures beyond project design features and fair share contributions for recommended improvements. Transportation and Traffic impacts under Alternative 2 would be **less than** the proposed project.

## m. Tribal Cultural Resources

Similar to Cultural Resources, development under Alternative 2 would involve ground-disturbing activities, such as grading and surface excavation, with the potential to unearth or adversely impact unidentified tribal cultural resources. Similar to the proposed project, Alternative 2 would be subject to Assembly Bill 52. Therefore, it is presumed that similar mitigation measures under Alternative 2 would arise from consulting with local tribes. Impacts under Alternative 2 would be **similar** to the proposed project.

## n. Utilities and Service Systems

Riverside Public Utilities would provide water service to the project under Alternative 2, as for all of the built alternatives. Therefore, the current and projected available water supplies would be the same as under the proposed project. The water demand of the project under Alternative 2 would be less than under the proposed project due to the removal of the commercial retail and restaurant uses, hotels, and the reduction in housing units. Development under this Alternative would result in approximately 185.9 acre-feet per year (AFY) of water use, as seen in Table 6-1. This would be 196 AFY less than the water use under the operation of the proposed project. It is anticipated that Utilities and Service Systems impacts under Alternative 2 would be **less than** the proposed project.

**Table 6-1 Estimated Alternative 2 Water Demand**

Land Use Type	Size	Duty Demand Factor	Projected Total Water Demand (AFY)
Apartments (Low Rise)	173 DU	0.715 AFY/unit	123.7
Single Family Housing	87 DU	0.715 AFY/unit	62.2
Total Water Demand			185.9

DU = Dwelling Units; AFY = acre-feet per year  
Source: WSA, Appendix N

## 6.3 Alternative 3: Mixed-Use Development with Lower Residential Density

### 6.3.1 Description

Alternative 3 does 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 on-site circulation and traffic flow would also remain the same. The commercial uses, hotels, and RV parking areas would 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 a mixed-use development.

The residential portion of the project under Alternative 3 would remain in the same location but would have a reduced density to be consistent with that allowed in the R-1-7000 Single-Family Residential Zone. The current project proposes a residential density of 26.2 units per acre. Alternative 3 would result in a density of 6.2 units per acre. The residentially zoned portion of the site consists of approximately 18.4 acres. Under this alternative, 114 residential units would be allocated instead of 482 units under the proposed project, a reduction in 368 units.

Alternative 3 would be the same as the proposed project except for the reduction in density and number of residential units. The site plan, circulation, and other uses and structures would remain the same. Alternative 3 varies from Alternative 2 by including the commercial and visitor-serving uses under the proposed project.

### 6.3.2 Impact Analysis

#### a. Aesthetics

Under Alternative 3, the existing visual character of the site would be altered through the introduction of development on a currently vacant site. Alternative 3 would consist of eight single-story commercial structures up to 39 feet, 6 inches in height and two hotels up to 64 feet, similar to the proposed project. It would introduce new multi-story buildings and land uses that differ from the surrounding uses and structures and what exist on the site now, similar to the proposed project.

Although residential structures in the MU-U zone can be up to 60 feet in height, the reduction in the number of residential units under Alternative 3 would likely reduce the buildings to two or three stories, whereas buildings would be up to four stories under the proposed project. The residential portion of the project under Alternative 3 would therefore reduce the size and massing of the residential structures adjacent to the existing single-family residences along Strong Street. The



residential structures and overall development would adhere to the City's design guidelines, and impacts to the existing visual character of the site and surrounding area would be less than significant. Light and glare impacts would be similar to the proposed project, though reduced in intensity and frequency due to the reduced building sizes and fewer resident vehicles frequenting the site. Overall, it is anticipated that Aesthetic impacts under Alternative 3 would be **similar** to the proposed project.

### **b. Air Quality**

Alternative 3 would have similar air quality impacts during the construction phase of the project. While the project is proposing 368 fewer residential units, the individual units could be much larger in size and still require similar amounts of construction equipment and architectural coatings. Therefore, similar mitigation as the proposed project such as the use of low VOC paints and watering during construction could be required under this Alternative.

The operation of the project would result in fewer emissions due to the reduction in housing units that would result in reduced average daily trips. Using CalEEMod annual VMT projections, Alternative 3 would result in 18,939,173 annual VMT compared to 23,605,082 annual VMT under the proposed project. This reduction would still produce operational NO<sub>x</sub> emissions that exceed South Coast Air Quality Management District thresholds. Impacts related to toxic air contaminants from the adjacent freeways would also be similar, as residential units and hotels would be located in similar places as with the proposed project. Overall, it is anticipated that Air Quality impacts under Alternative 3 would be **similar** to the proposed project.

### **c. Biological Resources**

Development of the site under Alternative 3 would still require site preparation and grading on an undeveloped area that could potentially impact burrowing owls, the on-site two water channels, nesting birds, and a small area of riparian waters protected under the Clean Water Act. The site layout and circulation roadways would be the same as under the proposed project. There is the potential for greater preservation of open space and habitat in the residential portion of the project, but overall the project would still require the implementation of mitigation measures BIO-1 through BIO-4 to reduce impacts of developing an undeveloped site. Therefore, it is anticipated that Biological Resources impacts under Alternative 3 would be **similar** to the proposed project.

### **d. Cultural Resources**

Alternative 3 would have similar ground-disturbing activities as the proposed project and would still have the potential to unearthen and impact unidentified archaeological resources, paleontological resources, and human remains. Therefore, Alternative 3 would also require the implementation of mitigation measures CR-1 through CR-4 to reduce any potential impacts. It is anticipated that impacts under Alternative 3 would be **similar** to the proposed project.

### **e. Energy Conservation**

Riverside Public Utility and SoCalGas would still supply energy for electricity and natural gas under Alternative 3. Construction fuel consumption would be similar to the proposed project. The electricity and natural gas consumption would be less than under the proposed project due the reduction in residential units. Similarly, the gas consumption for the operation of the project would be reduced since the estimated annual VMT would be fewer than the proposed project.

Development under Alternative 3 would be required to comply with all applicable energy conservation standards. Similar to Alternative 2, there would be the potential to incorporate more energy conservation measure (e.g., solar panels) if single-family dwelling units were to be proposed in the residential portion of the project. Energy conservation impacts under Alternative 3 would be **less than** the proposed project.

#### **f. Geology and Soils**

The existing geologic hazards on the site would remain the same as under the proposed project. The site has a low potential for liquefaction and a significant potential for hydroconsolidation, or soil collapse, as concluded in the geotechnical report (Appendix 3 of the Water Quality Management Plan [Appendix K]). Alternative 3 would develop structures subject to the same risks for soil collapse as the proposed project. This alternative would result in approximately 1,170 fewer permanent residents than the proposed project in areas with a substantial potential for soil collapse. However, overall impacts to the project would remain the same and the recommendations contained in the geotechnical report would be required as a mitigation measure under Alternative 3. Therefore, impacts from geology and soils would be **similar** to the proposed project.

#### **g. Greenhouse Gas Emissions**

Under Alternative 3, the duration of construction, equipment needs, and grading and paving quantities would be comparable to the proposed project. As such, construction GHG emissions would be similar to the proposed project. Operational GHG Emissions impacts would be reduced primarily due to a reduction in trip generation from 368 fewer dwelling units. It is anticipated that direct GHG emissions impacts under Alternative 3 would be **slightly less than** the proposed project, but emissions would still exceed SCAQMD thresholds and impacts would remain significant and unavoidable.

#### **h. Hydrology and Water Quality**

Alternative 3 would disturb soils across much of the project site similar to the proposed project. The project would obtain and comply with the National Pollutant Discharge Elimination System construction permit to reduce construction impacts of erosion and water quality through implementing a construction Stormwater Pollution Prevention Plan and BMPs. Alternative 3 would also develop the area within a one percent annual flood zone. The uses in the flood zone would be the same as the proposed project: multi-tenant commercial buildings, residential buildings, the entrance road, and live entertainment areas. Therefore, flooding impacts would be similar as the proposed project, and Alternative 3 would be required to comply with applicable flood hazard regulations and design on-site BMPs to mitigate the one-percent-annual-chance flood event as the proposed project.

Alternative 3 would cover the existing drainage channel, similar to the proposed project, and would require implementation of mitigation measures BIO-3 and BIO-4, which would reduce sediment impacts. The reduced residential density of this alternative would develop approximately the same areas of the site as would the proposed project; it would alter the existing drainage pattern and be required to capture and treat all on-site stormwater runoff. The residential area of the site could have greater preservation of open space and/or larger landscaped areas than under the proposed project, which would reduce the extent of the required stormwater BMPs. Development under Alternative 3 would still increase the amount of impervious surfaces though potential to a lesser

extent than the proposed project. Overall, impacts to Hydrology and Water Quality would be **similar or slightly less** than the proposed project.

### i. Land Use and Planning

Alternative 3 would still require General Plan and Zoning Code Amendments. The project site would include a similar mix of uses that would require a Mixed-Use land use and zoning designation. The development standards under Alternative 3 would comply with all applicable zoning regulations with regards to setbacks, density, height, and parking. Development under Alternative 3 would also be required to implement mitigation measures BIO 1a through BIO-4 to reduce potential impacts to sensitive species and habitats and could not conflict with the MSHCP. Impacts to Land Use and Planning would be **similar** as the proposed project.

### j. Noise

Alternative 3 would result in similar construction noise as the proposed project. Pursuant to RMC 7.35.020(G), noise sources associated with permitted construction, repair, remodeling, or grading of any real property are exempt from the interior and exterior noise standards and would also be exempt pursuant to RMC 7.35.020(G). Vibration impacts from the construction equipment would be similar to the proposed project.

The project would generate fewer trips due to the reduction in housing units and therefore, less traffic on local roadways than under the proposed project. Noise increases from the traffic under this Alternative would be less than significant, similar to the proposed project. Project operation would also generate new sources of noise from the project site to the surrounding sensitive receptors, but would remain less than significant. Development under this alternative could still result in an exceedance of nighttime exterior noise level standards at the nearby sensitive receptor. Therefore, a sound barrier wall would still be required. Noise impacts under Alternative 3 would be **similar** to the proposed project.

### k. Recreation

Alternative 3 would allow 368 fewer residential units and approximately 1,170 fewer permanent residents than the proposed project. However, the City is below its park standard of three acres per 1,000 residents, creating a situation of over-used parks and making residents in underserved neighborhoods use parks in other locations. Additional residents from the project would contribute to the overuse of parks and require increased maintenance and upgrades that would further impact the current state of the parkland to population standard. Alternative 3 would have a reduced impact on recreational facilities due to the reduced population. Development under Alternative 3 would still be required to provide 50 square feet of private open space per dwelling unit for at least 50 percent of the units and 50 square feet of common open space per dwelling unit, as required in Table 19.120.060 of the Municipal Code. Alternative 3 would also pay applicable park impact fees, similar to the proposed project, which would further reduce project impacts to recreational facilities. Therefore, impacts to recreational facilities under Alternative 3 would be **less than** the proposed project.

### l. Transportation and Traffic

Fewer residential units under Alternative 3 would reduce the amount of new traffic. Alternative 3 would still include similar commercial and retail development as that of the proposed project. While the reduction in residential units would slightly reduce traffic impacts to local roadways, there could

still be the potential for significantly impacted intersections and roadways under project operational conditions. Therefore, Transportation and Traffic impacts would be **slightly less than** under the proposed project, but still significant and potentially unavoidable.

### m. Tribal Cultural Resources

Development under Alternative 3 would involve ground-disturbing activities such as grading and surface excavation that has the potential to unearth or adversely impact unidentified tribal cultural resources. Similar to the proposed project, Alternative 3 would be subject to Senate Bill 18 and Assembly Bill 52 tribal consultation and mitigation measures similar to those under the proposed project would apply to Alternative 3 as well. Impacts under Alternative 3 would be **similar** to the proposed project.

### n. Utilities and Service Systems

Development under Alternative 3 would establish commercial uses, 114 residential units, two hotels, and 23 RV parking spaces, which would utilize water supplies in the City. This Alternative would also be provided water from the City's Public Utilities Department. This alternative would create a water demand of approximately 119 AFY, as seen in Table 6-2, or 263 AFY less water use than under the proposed project. This would be due the reduced number of residential units consuming water. The current and projected water supplies would remain the same under this Alternative. Therefore, it is anticipated that Utilities and Service Systems impacts under Alternative 3 would be **less than** the proposed project.

**Table 6-2 Estimated Alternative 3 Water Demand**

Land Use Type	Size	Duty/Demand Factor	Projected Total Water Demand (AFY)
Residential	114 units	0.715 AFY/unit	82
Commercial and Hotels	10.7 acres	2.0 GPM/acre	35
Road (La Cadena Drive)	2.8 acres	0.5 GPM/acre	2
Road (Orange Street)	0.2 acres	0.5 GPM/acre	<1
Total Water Demand			119

GPM = Gallons per Minute; AFY = acre-feet per year

Source: WSA, Appendix N

## 6.4 Alternative 4: No Riverside County Transportation Commission Lease Area Development

### 6.4.1 Description

Alternative 4: No Riverside County Transportation Commission (RCTC) Lease Area Development eliminates development on the RCTC leased land, approximately 4.34 acres of the site. This alternative would eliminate development of the RV Parking and reduce the parking lot area designated for the hotels. Alternative 4 would still consist of 482 residential units and 49,000 square feet of leasable commercial space, but with the reduction in viable parking lot area, only one hotel would be permitted. The site configuration and circulation system would remain the same as under

the proposed project. General Plan and Zoning Code amendments would still be required under Alternative 4 to allow for the mixed-use development.

Alternative 4 differs from Alternative 2 by proposing a greater residential density and including commercial and visitor serving uses. Alternative 4 differs from Alternative 3 by having a greater density of residential units and eliminating one hotel and the RV Parking component.

## 6.4.2 Impact Analysis

### a. Aesthetics

Under Alternative 4, the existing visual character of the site would be altered through the development of a vacant site. This Alternative proposes eight single-story commercial structures up to 39 feet, 6 inches in height and multi-family residential structures up to 42 feet, 2 inches high, similar to the proposed project. This would introduce visual impacts to the surrounding neighborhood.

Alternative 4 would include one hotel up to 64 feet in height, rather than two under the proposed project. This would slightly reduce aesthetic impacts. Moreover, the RCTC lease area would remain undeveloped and unpaved, which would leave the southeastern portion of the project site in its current state. Light and glare impacts would be similar to the proposed project, though slightly reduced in intensity and frequency due to a nominal decrease in the vehicular use a portion of the project site. Overall, it is anticipated that Aesthetic impacts under Alternative 4 would be **slightly less than** the proposed project.

### b. Air Quality

Construction air quality impacts would be slightly less than the proposed project during site grading and paving because there would be approximately 4 acres less to grade and pave. Emissions related to building construction and architectural coating would also be reduced slightly due to the elimination of one hotel from the project. Operational air quality impacts would be reduced primarily through a reduction in trip generation as a result of removing one hotel. Impacts from the toxic air contaminants from the adjacent freeways would also be slightly reduced as there would be one less sensitive receptor placed adjacent to the freeways. Overall, it is anticipated that air quality impacts under Alternative 4 would be **slightly less than** the proposed project.

### c. Biological Resources

Biological resources would still be impacted by development of the site. However, Alternative 4 would reduce the development footprint of the site by 4.34 acres, which could allow for the preservation of biological resources and habitat on the site. The existing drainage channels would still be impacted and the mitigation of habitat would be the same under this alternative. It is anticipated that under Alternative 4 impacts to biological resources would be **similar** to the proposed project.

### d. Cultural Resources

Cultural Resources would still be impacted by development of the site. Alternative 4 would reduce the development footprint of the site by 4.34 acres, which would reduce potentially impacting unknown cultural resources in the RCTC lease area. However, cultural resources would be

potentially impacted from the development of the rest of the project site and therefore, impacts to cultural resources under Alternative 4 would be **similar** to the proposed project.

#### **e. Energy Conservation**

Riverside Public Utility and SoCalGas would still provide energy supplies under Alternative 4 for electricity and natural gas. Construction fuel consumption would be slightly less than the proposed project due to the reduced area of grading and paving, and the elimination of one hotel. The consumption of electricity and natural gas would be less than the proposed project due to one less hotel and no RV parking spaces. Similarly, fuel consumption would be slightly less due to a small reduction in annual VMT.

Development under Alternative 4 would still be required to comply with all applicable energy conservation standards. Energy Conservation impacts under Alternative 4 would be **less than** the proposed project.

#### **f. Geology and Soils**

Under Alternative 4, the existing on-site geologic hazards would remain the same as under the proposed project. The site has a low potential for liquefaction and a significant potential for hydroconsolidation, or soil collapse, as concluded in the geotechnical report (Appendix 3 the Water Quality Management Plan [Appendix K]). Alternative 4 would still include development of commercial and residential structures, which would be subject to risk from soil collapse, similar to the proposed project. Overall impacts to the project under Alternative 4 would remain the same as under the proposed project and the recommendations contained in the geotechnical report would be required as a mitigation measure under Alternative 4. Therefore, impacts related to geology and soils would be **similar to** the proposed project.

#### **g. Greenhouse Gas Emissions**

Similar to air quality impacts, GHG emissions related to construction would be reduced as there would be 4.34 fewer acres impacted by site preparation, grading, and paving. There would be one less hotel to construct, which could reduce the construction period and slightly reduce GHG emissions during the building phase of construction. Operational GHG emissions impacts would be slightly reduced, primarily from a reduction in trip generation from eliminating one hotel and the RV parking area. Since the project would still include 483 residential units, 49,000 square feet of leasable commercial space, and one hotel, this alternative would still be expected to exceed GHG thresholds. Overall, it is anticipated that direct GHG emissions impacts under Alternative 4 would be slightly less than the proposed project, but since impacts would still be significant and unavoidable, GHG emissions under this Alternative would be **similar to** the proposed project.

#### **h. Hydrology and Water Quality**

Under Alternative 4, Hydrology and Water Quality would be impacted by development of the vacant site. The site would still introduce impervious surfaces for roadways, parking lots, and residential and commercial structures, which would impact stormwater runoff and groundwater recharge. Stormwater runoff from the impervious surfaces would be controlled with appropriate BMPs, similar to the proposed project. However, Alternative 4 would have 4.34 acres fewer of developed land, which would reduce impacts to stormwater runoff and groundwater. Overall, it is anticipated that impacts to hydrology and water quality under Alternative 4 would be **less than** the proposed project.

## i. Land Use and Planning

Eliminating development on the RCTC lease area would still require General Plan and Zoning Code amendments for implementation of Alternative 4. The project site would have a mix of uses similar to those of the proposed project and would require a land use and zoning designation for those uses. The development standards under Alternative 4 would comply with all applicable zoning regulations with regards to setbacks, density, height, and parking. Development under Alternative 4 would still be required to implement mitigation measures BIO 1a through BIO-4 to reduce potential impacts to sensitive species and habitats and could not conflict with the MSHCP. Impacts to Land Use and Planning would be **similar** to the proposed project.

## j. Noise

Alternative 4 would result in similar construction noise as the proposed project. Pursuant to RMC 7.35.020(G), noise sources associated with permitted construction, repair, remodeling, or grading of any real property are exempt from the interior and exterior noise standards and would also be exempt pursuant to RMC 7.35.020(G). Vibration impacts from the construction equipment would be similar to the proposed project.

The project would generate fewer trips and traffic on local roadways due to the elimination of one hotel and the RV Parking. Noise increases from the traffic under this Alternative would be less than significant, similar to the proposed project. Project operation would also generate new sources of noise from the project site to the surrounding sensitive receptors, but would remain less than significant. Project operation would result in similar exterior noise levels as the proposed project. Development under this Alternative would still result in an exceedance of nighttime exterior noise level standards at the nearby sensitive receptor. Therefore, a sound barrier wall along the northern property boundary would still be required. Noise impacts under Alternative 4 would be **similar** to the proposed project.

## k. Recreation

The exclusion of one hotel under Alternative 4 would reduce the number of jobs generated by the visitor-serving component from 37 to about 18, which in turn would reduce the indirect population growth by about 57 people. The project would still include 482 residential dwelling units, which would generate approximately 1,532 new residents to the City. The City does not meet its standard of three acres of parkland per 1,000 residents currently, and this Alternative would introduce a similar number of new people to the surrounding recreational facilities. Alternative 4 would also be required to provide the open space requirements necessary for the proposed project and similar park impacts fees would be levied. Since Alternative 4 would generate a similar population increase as the proposed project, impacts to Recreation would be **similar** to the proposed project.

## l. Transportation and Traffic

Alternative 4 would include one less hotel and no RV parking, which would slightly reduce the amount of new traffic to the site. While this would slightly reduce traffic impacts local roadways, Alternative 4 would still include 482 residential units, 49,000 square feet of commercial leasable space, one hotel, and the same traffic flow plan as the proposed project. Therefore, Alternative 4 would also significantly impact intersections and roadways and require similar mitigation measures. Transportation and Traffic impacts would be **similar** to the proposed project.

### m. Tribal Cultural Resources

Tribal Cultural Resources would still be impacted by development of the site. Alternative 4 would reduce the development footprint of the site by 4.34 acres, which would reduce potentially impacting unknown tribal cultural resources in the RCTC lease area. Development under Alternative 4 would involve 4.34 less acres of ground-disturbing activities, such as grading and surface excavation. However, the remaining project area would still have the potential to unearth or adversely impact unidentified tribal cultural resources. Similar to the proposed project, Alternative 4 would be subject to Senate Bill 18 and Assembly Bill 52 tribal consultation and mitigation measures similar to those under the proposed project would apply to Alternative 4 as well. Impacts under Alternative 4 would be **similar** to the proposed project.

### n. Utilities and Service Systems

Development under Alternative 4 would have residential, commercial, and hotel uses that would draw on water supplies in the City. This Alternative would utilize water from Riverside Public Utilities and the current and projected water supplies would remain the same. Water demand for visitor-serving uses would be reduced nearly in half to approximately 9.6 AFY. Therefore, it is anticipated that Utilities and Service Systems impacts under Alternative 4 would be **less than** the proposed project.

## 6.5 Alternatives Considered But Rejected

Section 15126.6 of the State CEQA Guidelines states that:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.

The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Other alternatives considered for this project include various scenarios that would change the use of certain parts of the proposed project. These included providing senior/assisted living housing in place of the proposed 482 residential units, providing medical offices in place of the hotels, and locating the same project with the same uses and layout in a different part of Riverside. Among the factors that may be used to eliminate alternatives from consideration in an EIR are (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts.

A senior/assisted living housing alternative would not reduce the environmental impacts of the proposed project, as this alternative would result in the same site plan, uses, and number of overall structures. The number of trips generated by senior or assisted living housing could be reduced, but the number of senior units permitted could also increase. This alternative would create greater



environmental impacts than the proposed project and therefore, was eliminated as a feasible alternative.

Similar to the senior/assisted living option, medical offices in place of the proposed hotels would not reduce significant environmental impacts and would generate a greater amount of peak-hour traffic than the proposed project. Also, this alternative would not meet the proposed project's objective to increase the number of hotel rooms in the City. Therefore, this was eliminated as a feasible alternative.

No feasible alternate locations in Riverside could accommodate the proposed 35.4-acre project. Smaller locations would not allow the project to substantially meet its objectives to provide for strategically located in-fill housing, a regional and neighborhood commercial center, and visitor-serving uses such as the hotels and RV parking, consistent with the City's Smart Growth principles. Therefore, this was eliminated as a feasible alternative.

## 6.6 Environmentally Superior Alternative

CEQA requires the identification of the environmentally superior alternative among the options studied. The environmentally superior alternative must be an alternative to the proposed project that reduces some of the environmental impacts of the proposed project, regardless of the financial costs associated with that alternative. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as environmentally superior may not be the one that best meets the goals or needs of the proposed project.

Table 6-3 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied. Based on the alternatives analysis provided above, Alternative 1: No Project Alternative, would be the environmentally superior alternative. The No Project Alternative would either avoid or lessen the severity of all significant impacts of the proposed project. However, the No Project Alternative would not fulfill the objectives of the proposed project.

When the "No Project" alternative is determined to be environmentally superior, State CEQA Guidelines also requires identification of the environmentally superior alternative among the development options. Of the other alternatives evaluated in this EIR, Alternative 2: Development of the Site Pursuant to Current Underlying Zoning Alternative, is determined to be the environmentally superior alternative.

**Table 6-3 Impact Comparison of Alternatives**

Area of Concern	Alternative 1: No Project	Alternative 2: Develop the Site Pursuant to Current Underlying Zoning	Alternative 3: Mixed-Use Development with Lower Residential Density	Alternative 4: No RCFCWCD Lease Area Development
Aesthetics	+	+	=	=/+
Air Quality	+	+	=	+
Biological Resources	+	=	=	=
Cultural Resources	+	=	=	=
Energy Conservation	+	+	+	=/+
Geology and Soils	+	=	=	=
Greenhouse Gas Emissions	+	+	=/+	=
Hydrology and Water Quality	+	+	+	+
Land Use/Planning	+	=/+	=	=
Noise	+	+	=	=
Recreation	+	+	+	=
Transportation	+	+	=/+	=
Tribal Cultural Resources	+	=	=	=
Utilities and Service Systems	+	+	+	+
+ Superior to the proposed project (reduced level of impact) - Inferior to the proposed project (increased level of impact) = Similar level of impact to the proposed project (same level of impact)				

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