RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIVERSIDE, CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE MASSACHUSETTS POINT PROJECT, MAKING CERTAIN FINDINGS OF FACT RELATED THERETO, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM, ALL PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, an application was submitted by Steven Christie of SCIND Massachusetts Point, LLC, for the development of two warehouse buildings consisting of 99,900 square feet and 99,950 feet, a Zoning Code Map Amendment to rezone the project site to change the Innovation District Overlay Zone subdistrict from EE – Employment Emphasis and HE – Housing Emphasis to IE – Industrial Emphasis subdistrict, a Zoning Code Text Amendment to modify development standards of the Innovation District, a Tentative Parcel Map for a two-lot subdivision for condominium purposes, Design Review of project plans, Development Agreement, and an Environmental Impact Report (collectively the "Project") was presented for consideration; and

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

WHEREAS, in accordance with the requirements of Section 15082(a) of the State CEQA Guidelines, on December 11, 2024, the City prepared and distributed a Notice of Preparation ("NOP") to all appropriate responsible and trustee agencies and to all organizations and individuals requesting notice, stating that an EIR would be prepared for the Project; and

WHEREAS, on December 12, 2024, the NOP was sent to the State Clearinghouse (SCH No. 2024120391); and

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

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WHEREAS, the Draft EIR was completed and a Notice of Completion ("NOC") and the Draft EIR was filed with the State Clearinghouse on or about June 26, 2025, in accordance with the provisions of section 15085 of the State CEQA Guidelines; and

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

WHEREAS, the NOC and the NOA provided a 45-day public review period commencing on June 26, 2025, and ending on August 11, 2025; and

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

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

WHEREAS, the City Planning Commission held a duly noticed hearing on the Draft EIR on January 29, 2026, and made certain recommendations to the City Council; and

WHEREAS, the Final Environmental Impact Report dated November 2025, for the Project consists of a Draft EIR dated June 2025, comments and recommendations received on the Draft EIR, responses to comments on the Draft EIR, changes to the Draft EIR, and a Mitigation Monitoring and Reporting Program (collectively "FEIR"); and

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

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

WHEREAS, the City Council held a duly noticed hearing on the FEIR on March 17, 2026, at which time additional written and oral testimony was received; and

WHEREAS, the City Council has been presented with and is familiar with the information in the administrative record, including the Staff Reports and the written and verbal testimony submitted thereon, and has reviewed and considered the information in the FEIR for completeness and compliance with the CEQA Regulations, has independently reviewed and analyzed the FEIR and has duly heard and considered the Staff Reports and all written and oral arguments presented at its meeting of March 17, 2026; and

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

impacts and mitigation measures associated with the Project, as well as complete and accurate reporting of any unavoidable impacts and benefits of the Project; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Section 5: Potential environmental effects have been studied and there is no substantial evidence in the record, as a whole, that supports any argument that the Project, as designed and mitigated, may cause a significant effect on the environment. No facts, reasonable assumptions predicated on facts, testimony supported by adequate factual foundation, or expert opinion supported by facts has been submitted that refute the conclusions reached by the FEIR, studies, data and reports. Nor does anything in the record alter the environmental determination, as presented, based upon investigation and independent assessment of those studies, data and reports.

No new significant impacts have been raised by any commenting individual or entity, nor has any significant new information been added to the FEIR that would require recirculation under State CEQA Guidelines section 15088.5.

Section 6: The FEIR dated November 2025, for the Project reflects the independent judgment of the City based upon the findings and conclusions stated in the FEIR, staff reports, and in consideration of testimony and information received, and scientific and factual data presented in evidence during the review process.

Section 7: The City Council Finds that the FEIR dated November 2025, has fully examined the environmental impacts of the Project and, based on the information in the administrative record, including the analysis in the FEIR, has determined that the impacts on aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources, energy conservation, geology and soils, Greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire either have no impact, are less than significant or are potentially significant but that with mitigation the impacts are reduced to less than significant based on the Findings set forth in Exhibit "A" attached hereto and incorporated herein by reference, as well as the findings and analysis contained in the FEIR (collectively "Findings"). The Findings are supported by substantial evidence contained therein as well as in the record, and as such, said Findings are hereby adopted by the City Council.

Section 8: The City Council finds that the FEIR dated November 2025, has fully examined the environmental concerns associated with the Project and, based on the information in the administrative record, including the analysis in the FEIR, has determined that no impacts remain significant after mitigation.

Section 9: The City Council finds that, the Project, including all mitigation measures, conditions, permits and approvals will not have any other significant adverse unmitigated impacts on the environment. Potential environmental effects have been studied and there is no substantial evidence in the record, as a whole, that supports any argument that the Project, as designed and

mitigated, would cause a significant effect on the environment, No facts, reasonable assumptions predicated on facts, testimony supported by adequate factual foundation, or expert opinion supported by facts has been submitted that refute the conclusions reached by the FEIR, studies, data and reports. Nor does anything in the record alter the environmental determination, as presented, based upon investigation and independent assessment of those studies, data and reports.

Section 10: The City Council finds that three (3) alternatives, including the No Project Alternative, were identified and analyzed in the FEIR and all were rejected as failing to meet most of the Project objectives, or to a lesser extent, as not sufficiently reducing environmental impacts as compared to the Project (Alternatives 2 and 3), and/or as infeasible, due to specific economic, legal, social technological and other considerations (all alternatives). These grounds are contained in the entirety of the administrative record, including the FEIR, the attached Exhibit "A" Findings, and the written and verbal testimony. Specifically:

(a) Alternative – No Project. This Alternative was rejected because it would not meet any of the Project objectives. This alternative would not make efficient use of the site for employment uses, would not, would not attract new businesses and employment, would not reduce the need for residents to commute outside the Project vicinity to work, would not help meet demand for logistic businesses in the city and surrounding region, would not redevelop the site with up-to-date efficient building standards, and would not build a project that is compatible with the surrounding industrial and manufacturing uses that were recently built or approved for construction.

(b) Alternative 2 – The Reduced Project Alternative. This Alternative would result in lessening of impacts to nine of the 20 environmental topics analyzed in this Draft EIR due to the 50 percent reduction in building space. However, this alternative would not change the overall impact conclusions (impact level) of any of the 20 environmental topics analyzed in this Draft EIR. All mitigation measures included in the Project for biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources would still be applicable to

this alternative. This Alternative would partially meet most majority of Project objectives, but not to the same extent as the proposed Project. Feasibility may also be determined from the desirability of the measure or alternative from a policy standpoint, as reasonably determined by the City Council. This alternative is infeasible as the impacts remain similar to the Project, but the Project Objectives are not proportionally met, and it is infeasible for policy and other considerations.

(c) Alternative 3 – No Project/Buildout of Employment Emphasis Subdistrict. Alternative 3 would not reduce the impacts compared to the Project., but would not meet most of the Project objectives. Alternative 3 was rejected as a project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) inability to avoid environmental impacts, and (2) failure to meet the project objectives. It is further infeasible for policy and other considerations.

Section 11: The FEIR dated November 2025, for the Project has been completed and processed in compliance with the requirements of the CEQA Regulations (both state and local), and based on the entirety of the administrative record is hereby certified.

Section 12: Specific environmental, economic, social, legal, technical and other considerations and benefits derived from the development of the Project override and make infeasible any alternative to the Project or further mitigation measures beyond those incorporated into this Project.

Section 13: The City Council finds that all significant environmental impacts from implementation of the Project have been identified in the FEIR and, with the implementation of the mitigation measures set forth in the Mitigation Monitoring and Reporting Program contained in Exhibit "B" attached hereto and incorporated herein by reference, will be mitigated to a less-than-significant level. The City Council hereby adopts the Mitigation Monitoring and Reporting Program for the Project to implement the policies, goals and implementation measures identified in the FEIR as necessary to preclude the need for further mitigation measures. Said Mitigation

Monitoring and Reporting Program, contained in the FEIR and attached hereto as Exhibit "B", is hereby incorporated as part of the approval of the City Council for the adoption of the Project.

Section 14: The City Council hereby finds that the locations of documents and other materials which constitute the record of proceedings upon which its decision is based are the Community & Economic Development Department, Planning Division and the City Clerk's Office located at 3900 Main Street, Riverside, California 92522, and the custodian of such records shall be the Community & Economic Development Director and the City Clerk, respectively.

ADOPTED by the City Council this _____ day of _____, 2026.

_____
PATRICIA LOCK DAWSON
Mayor of the City of Riverside

Attest:

_____
DONESIA GAUSE
City Clerk of the City of Riverside

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I, Donesia Gause, City Clerk of the City of Riverside, California, hereby certify that the foregoing resolution was duly and regularly adopted at a meeting of the City Council on the ____ day of _____, 2026, by the following vote, to wit:

Ayes:

Noes:

Abstain:

Absent:

IN WITNESS WHEREOF I have hereunto set my hand and affixed the official seal of the City of Riverside, California, this ___ day of _____, 2026.

_____
DONESIA GAUSE
City Clerk of the City of Riverside

313280 ALB 02/04/26

EXHIBIT A

CEQA FINDINGS OF FACT

EXHIBIT A

**FINDINGS AND FACTS IN SUPPORT OF FINDINGS
FOR THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE
MASSACHUSETTS POINT PROJECT
CITY OF RIVERSIDE, CALIFORNIA
STATE CLEARINGHOUSE NO. 2024120391**

1.0 INTRODUCTION

This statement of Findings of Fact (Findings) addresses the environmental effects associated with the proposed Massachusetts Point Project (Project, or proposed Project), as described in the Environmental Impact Report (EIR). These Findings are made pursuant to the California Environmental Quality Act Public Resources Code, Section 21000 et seq., Section 21081, and CEQA Guidelines Section 15091 (collectively, CEQA). The Draft EIR examines the full range of potential effects of construction and operation of the Project and identifies standard mitigation practices that could be employed to reduce, minimize, or avoid those potential effects.

1.1 FINDINGS OF FACT

CEQA requires that a public agency consider the environmental impacts of a project before a project is approved and make specific findings. CEQA Guidelines Section 15091, implementing Public Resources Code Section 21081, provides:

a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

    1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR [referred to in these Findings as "Finding 1"].
    2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can or should be adopted by such other agency [referred to in these Findings as "Finding 2"].
    3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR [referred to in these Findings as "Finding 3"].

b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.
c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.

f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

CEQA Guidelines Section 15093 further provides:

a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. This statement of overriding considerations shall be supported by substantial evidence in the record.
c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the Notice of Determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, reviewed, and considered the Draft Environmental Impact Report (Draft EIR) and the Final Environmental Impact Report (FEIR) for the Massachusetts Point Project, SCH No. 2024120391 (collectively, the EIR), as well as all other information in the record of proceedings on this matter, the following Findings and Facts in Support of Findings (Findings) are hereby adopted by the City of Riverside (City) in its capacity as the CEQA Lead Agency.

These Findings set forth the environmental basis for the discretionary actions to be undertaken by the City for the development of the Project. These actions include the approval of the Zoning Code (Map/Text) Amendment, Development Agreement, Tentative Parcel Map, and Design Review. This action is referred to herein as the Project.

All acronyms used herein shall have the meaning as defined in the Draft EIR.

1.2 RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed Project consists of the following documents and other evidence, at a minimum:

- The Notice of Preparation (NOP) and all other public notices issued by the City in conjunction with the proposed Project;
- The Final EIR (includes Draft EIR) for the proposed Project;
- All written comments submitted by agencies and members of the public during the public review comment periods on the Draft EIR;
- All responses to written comments submitted by agencies and members of the public during the public review comment period on the Draft EIR;
- The Mitigation Monitoring and Reporting Program (MMRP);
- The reports and technical memoranda included or referenced in the Response to Comments of the Final EIR;
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR or Final EIR;
- The Ordinances and Resolutions adopted by the City in connection with the proposed Project, and all documents incorporated by reference therein;

- Matters of common knowledge to the City, including but not limited to applicable federal, State, and local laws and regulations;
- Any documents expressly cited in these Findings; and
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e).

1.3 DOCUMENT FORMAT

These Findings have been organized into the following sections:

Section 1 Provides an introduction to these Findings.

Section 2 Provides a summary of the Project and overview of the discretionary actions required for approval of the Project, and a statement of the Project's objectives.

Section 3 Provides a summary of previous environmental reviews related to the Project area that took place prior to the environmental review done specifically for the Project, and a summary of public participation in the environmental review for the Project.

Section 4 Sets forth that the Draft EIR reflects the City's independent judgment.

Section 5 Sets forth findings regarding environmental impacts identified in the EIR which were determined not to be significant.

Section 6 Sets forth findings regarding environmental impacts identified in the EIR which can feasibly be mitigated to a less than significant level through the imposition of project design features, regulatory requirements, and/or mitigation measures. In order to ensure compliance and implementation, all of these measures are included in the Mitigation Monitoring and Reporting Program (MMRP) for the Project which shall be adopted by the City together with these Findings in accordance with Public Resources Code Section 21081.6. Where potentially significant impacts can be reduced to less than significant levels through adherence to project design features and regulatory requirements, these findings specify how those impacts were reduced to an acceptable level.

Section 7 Sets forth findings regarding growth inducing impacts.

Section 8 Sets forth findings regarding significant irreversible effects.

Section 9 Sets forth findings regarding alternatives to the proposed Project.

Section 10 Sets forth findings regarding the Mitigation Monitoring and Reporting Program.

Section 11 Certification of the Final EIR.

Section 12 Provides a summary of the conclusions.

1.4 CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials which constitute the administrative record for the City's actions related to the Project are located at the City of Riverside, 3900 Main Street, Riverside, CA 92522. The City is the custodian of the administrative record for the Project. This information is provided in compliance with Public Resources Code section 21081.6.

The record of proceedings for the City's decision on the Project consists of the following documents, at a minimum:

1. The NOP and all other public notices issued by the City in conjunction with the Project;
2. The Draft EIR for the Massachusetts Point Project, including technical appendices;
3. All comments submitted by agencies or members of the public during the 45-day comment period on the Draft EIR;

4. The Final EIR for the Massachusetts Point Project, including comments received on the Draft EIR, responses to those comments, and technical appendices;
5. The MMRP for the Project;
6. All findings, resolutions and ordinances adopted by the City in connection with the Massachusetts Point Project and all documents cited or referred to therein;
7. All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the Massachusetts Point Project;
8. All documents submitted to the City by other public agencies or members of the public in connection with the Massachusetts Point Project up though Project approval.
9. Matters of common knowledge to the City, including, but not limited to federal, State, and local laws and regulations;
10. Any documents expressly cited or referenced in these findings, in addition to those cited above; and
11. Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

2.0 PROJECT SUMMARY

2.1 PROJECT LOCATION

The Massachusetts Point Project (the Project, or proposed Project) is located in the northern portion of the City of Riverside at 2626 Kansas Avenue, 2069 Massachusetts Avenue, and 1989 Massachusetts Avenue. Regional access to the Project site is provided via Interstate 215 (I-215), State Route 60 (SR-60) and State Route 91 (SR-91). Local access to the Project site is provided via Kansas Avenue, Massachusetts Avenue, and Roberta Street.

The Project site encompasses approximately 14.42 acres and is identified by Assessor's Parcel Numbers (APNs) 210-130-015, -16, and -20. APN 210-130-015 (2626 Kansas Avenue) The Project site is relatively flat and has an elevation of approximately 904 feet above mean sea level (AMSL) at the southeast corner to approximately 889 feet AMSL at the northwest corner.

2.2 PROJECT DESCRIPTION

The Project would demolish the existing 99,850 SF of structures on 2626 Kansas Avenue and redevelop 2626 Kansas Avenue and 2069 Massachusetts Avenue with two Class A light industrial buildings at 99,900 SF and 99,950 SF on approximately 10.21 acres. Additional improvements would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, construction of a cul-de-sac driveway, and pavement of parking areas and drive aisles. No development is proposed on APN 210-130-020 (1989 Massachusetts Avenue).

Zone Change. The Project would amend the City's zoning code and zoning map to change the site's Innovation District (ID) Overlay Zoning subdistrict from Employment Emphasis (EE) and Housing Emphasis (HE) to Industrial Emphasis (IE), which will allow for the proposed industrial buildings and would be consistent with the site's Industrial General Plan land use designation.

The proposed zone change also includes modification of the development standards in the IE overlay zone. Proposed modifications include, but are not limited to: specifying a minimum floor area ratio (FAR) allowance

for sites under five acres and sites over five acres; defining the maximum height allowance to be 75 feet; modifying the allowed building setbacks; and reducing the parking requirement.

Tentative Parcel Map. The Project includes a Tentative Parcel Map (TPM) for a two lot subdivision for condominium purposes that would allow individual ownership of building units.

Building and Architecture. The Project would construct two new industrial buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) that would support warehouse and office uses. Building 1 is proposed to consist of 99,900 SF, inclusive of 93,900 SF of warehouse space and 6,000 SF of ground floor office space. Building 1 would have a footprint of 99,900 SF, resulting in a FAR of 0.45. Building 2 is proposed to consist of 99,950 SF, inclusive of 91,700 SF of warehouse space, 6,000 SF of ground floor office space, and 2,250 of mezzanine space to be used as office space. Building 2 would have a footprint of 97,700 SF, resulting in an FAR of 0.45. No development is proposed on APN 210-130-020 (1989 Massachusetts Avenue).

Building 1 would be oriented to the north, with frontages along Roberta Street to the north and Kansas Avenue to the west. Building 1 would be set back 79 feet from the northern property line, approximately 48 feet from the eastern property line, approximately 70 feet from the southern property line, and a minimum of 10 feet and 6 inches from the western property line.

Building 2 would be oriented to the west, along Kansas Avenue to the west and Massachusetts Avenue to the south. Building 2 would be set back 130 feet from the northern property line, approximately 84 feet from the eastern property line, approximately 10 feet from the southern property line, and approximately 79 feet from the western property line.

Both buildings would be single-story and approximately 46 feet in height. The buildings would establish an architectural presence through an emphasis on building finish materials and consistent material usage and color scheme. They would be grey with highlights of blue glazing and brick accents. The use of landscaping, building layout, finish materials, and accenting on the Project site would create a quality architectural presence along the Massachusetts Avenue and Kansas Avenue frontages.

Circulation and Parking. The Project would construct five new driveways. Driveway 1 would be a cul-de-sac driveway located to the northeast of the Project site, along Roberta Street, would be 37 feet and 6 inches-wide, and provide both passenger vehicle and truck access. Driveway 2 would be located northwest of the Project site, along Roberta Street, would be 26-feet-wide, and be limited to passenger vehicles. Driveway 3 would be located along Kansas Avenue (center), would be 50 feet-wide, and provide access to both passenger vehicles and trucks. Driveway 4 would be located to the southwest of the Project site, along Kansas Avenue, would be 26-feet-wide, and be limited to passenger vehicles. Driveway 5 would be located along Massachusetts Avenue, would be 35-feet-wide, and provide both passenger vehicle and truck access. Access to Building 1 would be provided via Driveways 1, 2, and 3. Access to Building 2 would be provided via Driveways 3, 4, and 5.

Trucks are expected to primarily utilize Kansas Avenue, Massachusetts Avenue, and 3rd Street. Internal access for both buildings would be provided via 26- to 35-foot-wide drive aisles which would double as fire lanes.

Building 1 would include 17 dock doors located along the southern side of the building. Additionally, Building 1 would include 130 passenger vehicle spaces, inclusive of electric vehicle (EV) and accessible (ADA) spaces, for use by employees and visitors in surface lots to the north, south, and east sides of Building 1.

Building 2 would include 22 dock doors located along the northern side of the building. Additionally, Building 2 would include 131 passenger vehicle spaces, inclusive of EV and ADA spaces for use by employees and visitors in surface lots to the north, east, and west sides of Building 2.

Landscaping and Fencing. The Project includes approximately 22,240 SF (or 0.51 acres) of ornamental landscaping around the perimeter of the site and in-between parking areas. Landscaping would include 24-inch and 36-inch box trees, 5-gallon shrubs, accents, and groundcover to screen the proposed building, parking, and loading areas from off-site viewpoints.

Building 1 would include 6-foot-high metal sliding gates at the two driveways on Roberta Street and at the east and west entrances to the truck court to provide controlled access. Additionally, a 6-foot-high fence (consisting of a 4-foot-high CMU [concrete masonry unit] wall with 2 feet of tubular steel on top) would be installed along the northern property line, a portion of the northwest property line, and along the southern property line where the truck trailer parking is located. Building 1 would also include a 6-foot-high tubular steel fence along the eastern property line.

Building 2 would include 6-foot-high metal sliding gates at the driveway on Massachusetts Avenue, at the northwest entrance to the passenger vehicle parking, and along the eastern entrance to the truck court to provide controlled access. Additionally, a 6-foot-high fence (consisting of a 4-foot-high CMU wall with 2 feet of tubular steel on top) would be installed along the northern property line along the truck trailer parking, as well as along the western property line and along the southwest and southeast portions of the southern property line. Building 2 would also include a 6-foot-high tubular steel fence along the eastern property line.

Infrastructure. Regulated electrical, gas, and communication utilities would be extended to the site from existing facilities along Kansas Avenue, Roberta Street, and Massachusetts Avenue. Specifically, the Project would connect to existing overhead electrical utilities located on Kansas Avenue and Roberta Street (along the northeast boundary). The extended electrical utilities would be undergrounded within the sidewalk and/or parkway along Roberta Street (north side) and Kansas Avenue (west side of the project site).

The Project would install new public fire hydrants on Massachusetts Avenue, Kansas Avenue, and Roberta Street to meet maximum spacing requirements, as well as new water service laterals that would connect to the existing 10-inch water line in Massachusetts Avenue.

The Project applicant would also install new private sewer lines to connect to the existing 8-inch sewer lines in Massachusetts Avenue and Roberta Street.

The proposed development would be consistent with the natural drainage pattern of the existing site. The proposed Project would collect drainage via grate inlets and catch basins, which would convey stormwater to an on-site underground storm drain system. The storm drain system would discharge to two proposed on-site, underground detention/infiltration systems. Detention/infiltration System A would be located underneath the passenger drive aisle in the northwest portion of the site and would direct overflow to Roberta Street. Detention/infiltration System B would be located beneath the truck court of Building 1 and would direct overflow to Kansas Avenue. In the current condition, the existing 100-year, 3-hour flow is 4.56 cubic feet per second (cfs) on Roberta Street and 12.41 cfs on Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing on-site flows. The infiltration systems are sized to capture peak storm events, and any potential overflow will be directed to Kansas Avenue and Roberta Street. The site's storm drainage system would be designed to meet the regional low impact development (LID) structural treatment control best management practices (BMPs).

Street Improvements. The proposed Project would close the existing driveways on Massachusetts Avenue, Kansas Avenue, and Roberta Street, and construct six new driveways: two on Roberta Street, three on Kansas Avenue, and one on Massachusetts Avenue. The proposed northeastern driveway on Roberta Street would be a cul-de-sac driveway. The Project includes a proposed right-of-way dedication for construction of the cul-de-sac driveway.

A minimum of 6-foot-wide sidewalks would be constructed along the Project frontages on Kansas Avenue, Roberta Street, and Massachusetts Avenue. Additionally, 24-inch to 48-inch box trees would be planted within the landscaped setbacks on Roberta Street, Kansas Avenue, and Massachusetts Avenue

2.3 DISCRETIONARY ACTIONS

The City of Riverside and the following responsible agencies are expected to use the information contained in this Draft EIR for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

As part of the proposed Project, the following discretionary actions and subsequent approvals are requested by the Project proponent:

- Zoning Code (Map/Text) Amendment
- Development Agreement
- Tentative Parcel Map
- Design Review
- Certification of the Environmental Impact Report
- Ministerial approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.

In addition, the proposed industrial development will require ministerial approvals by other agencies that include, but are not limited to, the following:

- Riverside Airport Land Use Commission (ALUC) for the Zoning Code Map and text amendments
- Regional Water Quality Control Board (RWQCB) and City for approval of a Stormwater Pollution Prevention Plan (SWPPP) and a Water Quality Management Plan
- South Coast Air Quality Management District (SCAQMD) construction permits

2.4 STATEMENT OF PROJECT OBJECTIVES

The following objectives have been identified in order to aid decision makers in their review of the proposed Project and its associated environmental impacts.

1. To make efficient use of the property in the City of Riverside by adding to its potential for employment generating uses.
2. To attract new business and employment to the City of Riverside and thereby promote economic growth.
3. To reduce the need for members of the local workforce to commute outside the Project vicinity to work.
4. To redevelop a partially underutilized property with two industrial warehouse buildings near I-215, SR-60, and SR-91, to help meet demand for logistics business in the City and surrounding region.
5. To develop two warehouse facilities with updated infrastructure that are up-to-date with efficient building standards.

6. To build an industrial warehouse project in the City of Riverside that is similar to and compatible with other industrial buildings that were recently built or recently approved for construction in the City of Riverside.

3.0 ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

The Final EIR (FEIR) incorporates the Draft EIR dated June 2025, written comments on the Draft EIR that were received during the public review period, written responses to those comments, and changes to the Draft EIR. In conformance with CEQA and the CEQA Guidelines, the City of Riverside conducted an extensive environmental review of the Massachusetts Point Project, including the following:

- Completion of the NOP, which was released for an initial 30-day public review period from December 12, 2024, through January 20, 2025. The NOP was posted at the Riverside County Clerk's office on December 11, 2024 and to the State Clearinghouse (SCH) on December 11, 2024. The notice was mailed to reviewing agencies and to City residents and owners within a 300-foot radius from the Project Site. Copies of the NOP were made available for public review on the City's website at: https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents
- Completion of a scoping process, in which the public was invited by the City to participate. A virtual scoping meeting for the EIR was held by the City of Riverside on January 9, 2025, at 6:00 PM.
- Preparation of a Draft EIR by the City, which was made available for a 45-day public review period from June 26, 2025, to August 11, 2025. The Draft EIR consisted of the analysis of Massachusetts Point Project and appendices, including the NOP and responses to the NOP. The Notice of Availability (NOA) for the Draft EIR was sent to all property owners and occupants within a 300-foot radius from the Project site, all persons, agencies, and organizations on the interest list interested persons, and posted to the SCH website for distribution to public agencies. The NOA was posted at the City of Riverside, Planning Division, 3900 Main Street, Third Floor, Riverside, CA 92522 on June 26, 2025. Copies of the Draft EIR were made available for public review at (1) Riverside City Hall, Community & Economic Development Department, Planning Division, 3900 Main Street, Third Floor, Riverside, CA 92522; (2) the Riverside Main Public Library, 3911 University Avenue, Riverside, CA 92501; and (3) Community Center at Lincoln Park, 4261 Park Avenue, Riverside, CA 92507; and it was available for download via the City's website at https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents.
- Preparation of a Final EIR, including the Comments and Responses to Comments on the Draft EIR, occurred in August 2025. The Final EIR/Response to Comments contains comments on the Draft EIR, responses to those comments, revisions to the Draft EIR, and appended documents. The Final EIR Response to Comments was released for a 10-day agency review period prior to certification of the Final EIR on March 17, 2026.
- A Planning Commission hearing was held for the proposed Project. A notice of the Planning Commission hearing for the Project was mailed on January 2, 2026 to all property owners of record within a 300-foot radius from the Project site and all individuals that requested to be notified and posted on the City's website: https://riversideca.gov/cedd/planning/development-projects-and-ceqa-documents, as required by established public hearing posting procedures.

4.0 CEQA FINDINGS OF INDEPENDENT JUDGEMENT

Independent Review and Analysis

The Final EIR reflects the City's independent judgment. The City has exercised independent judgment in accordance with Public Resources Code 21082.1(c)(3) in retaining its own environmental consultant in the

preparation of the Draft EIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

Having received, reviewed, and considered the information in the Final EIR, as well as any and all other information in the record, the City hereby makes findings pursuant to and in accordance with Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

5.0 IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT

The City determined, based upon the CEQA threshold criteria for significance, that the Project would have *no impact or a less-than-significant impact* to the following environmental topics discussed below in Section 5.1, and that no mitigation measures were required. This determination is based upon the environmental analysis in the Draft EIR and the comments received on the Draft EIR.

Where the potential impact can be reduced to less than significant solely through adherence to and implementation of project design features, standard conditions, and plans, programs, or policies, these measures are considered "incorporated into the project," which mitigate or avoid the potentially significant effect, and in these situations, the City has found in accordance with Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a) (1) that "Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment." which is referred to herein as "Finding 1."

The City hereby finds that existing regulatory requirements, policies, and/or Project conditions have been identified and incorporated into the Project which avoids or substantially lessens the potentially significant effect on the environment to a less than significant level. No substantial evidence was submitted to or identified by the City which indicated that the Project would result in a significant impact related to the following.

- Aesthetics
- Agriculture
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service System
- Wildfire

5.1 AESTHETICS

Aesthetics Threshold A Finding: The Project would not have a substantial adverse effect on a scenic vista Impacts would be less than significant (Draft EIR page 5.1-5).

Facts in Support of Finding: Distant, obstructed views of Mount Rubidoux and the Box Springs Mountains are visible from the Project site to vehicles and pedestrians traveling north to south on Kansas Avenue and traveling east or west on Massachusetts Avenue and Roberta Street. Views of the Santa Ana River watercourse and riverbed are not visible from the Project site or within the immediate vicinity of the site. The Project would redevelop 10.21 acres of the site with two industrial warehouse buildings that would be approximately 46 feet tall and would be set back from the adjacent streets so as not to encroach into the existing public long-distance views. As such, implementation of the Project would not substantially change

the existing available views of Mount Rubidoux and the Box Springs Mountains compared to existing conditions.

The proposed Project has a minimum landscaped setback of 10 feet along Kansas Avenue, Massachusetts Avenue, and Roberta Street. Additionally, Building 1 would be set back approximately 79 feet from the northern property line, a minimum of 48 feet from the eastern property line, a minimum of 35 feet from the southern property line, and a minimum of 10 feet and 6 inches from the western property line. Building 2 would be set back approximately 130 feet from the northern property line, a minimum of 84 feet from the eastern property line, a minimum of 10 feet from the southern property line, and a minimum of 79 feet from the western property line. The building setbacks would ensure that public views along the nearby roads would not be impacted, and landscaping would ensure that views of the site would be broken up and avoid monotonous views of the large walls of the buildings.

The building height, massing, setbacks, new sidewalks and layered landscaping would ensure that public views of Mount Rubidoux and the Box Springs Mountains remain visible to vehicles and pedestrians traveling along Kansas Avenue, Massachusetts Avenue, and Roberta Street. Thus, long range views of Mount Rubidoux and the Box Springs Mountains would continue to be available from public vantage points on surrounding streets. Therefore, the Project would have a less than significant impact on any scenic vistas in the area.

Aesthetics Threshold B Finding: The Project would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway. No impact would occur (Draft EIR page 5.1-6).

Facts in Support of Finding: According to the California Department of Transportation (Caltrans) Scenic Highway Map, there are no officially designated State scenic highways near the Project site. The closest eligible scenic highway to the Project site is Interstate-15 (I-15) which is located approximately 13.2 miles southwest of the site, and the Project site is not visible from I-15. Therefore, the Project site would not damage scenic resources such as rock outcroppings, historic buildings, or trees within a state scenic highway, and no impacts would occur.

Aesthetics Threshold C Finding: The Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant (Draft EIR page 5.1-6).

Facts in Support of Finding: The proposed Project is in an urbanized area and has an existing General Plan land use designation of Industrial (I) and is zoned General Industrial. The Project is within the City's Innovation District (ID) Overlay Zone and is within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The Project includes an amendment to the City's zoning code and zoning map to change the site's ID Overlay Zoning subdistrict from EE and HE to Industrial Emphasis (IE) so that the zone is consistent with the proposed industrial buildings and the General Plan. Additionally, the proposed zone change also includes modification of the development standards in the IE zone, for which the proposed Project would be subject to. The Project would be consistent with the proposed modifications to the IE development standards and would not conflict with an applicable zoning regulation related to scenic quality. Therefore, the Project would not conflict with applicable zoning regulations and impacts would be less than significant.

Aesthetics Threshold D Finding: The Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant (Draft EIR page 5.1-9).

Facts in Support of Finding: The Project site is heavily disturbed and developed, and located in a primarily developed industrial area. Limited nighttime lighting would be needed for Project construction. The majority

of the construction activities would occur during daytime hours during the week, and construction-related illumination would be used for limited safety and security purposes and would be required to be directed downward in compliance with Riverside Municipal Code Chapter 19.556 (Outdoor Lighting), included as PPP AES-1.

During operations, potential spill of light onto surrounding properties and "night glow" would be reduced by using hoods and other design features on the light fixtures used within the proposed Project. The Project's lighting would be designed to adhere to the recommended lighting practices in the Attorney General's Warehouse Projects Best Practices (PDF AES-1). Additionally, implementation of the existing regulatory requirements per City of Riverside Municipal Code Chapter 19.556 (Outdoor Lighting), included as PPP AES-1, would occur during the City's permitting process and would ensure that impacts related to light and glare are less than significant. Therefore, with implementation of PPP AES-1 and PDF AES-1, impacts would be less than significant.

Aesthetics Cumulative Finding: The Project would not result in cumulative impacts to aesthetics. Impacts would be less than significant.

Facts in Support of Finding: Based on the foregoing discussion under Aesthetics Threshold A through D, the Project would not result in, or contribute to, a cumulatively significant impact to aesthetics (Draft EIR page 5.1-10).

Plans, Programs, and Policies

PPP AES-1: Light and Glare. All lights shall be directed and/or shielded to prevent the light from adversely affecting adjacent properties. No structure or lighting feature shall be permitted which creates adverse glare. A photometric plan shall be provided that indicates the amount of light emanating from the proposed/existing light fixtures to comply with City of Riverside Municipal Code Chapter 19.556, Outdoor Lighting.

Project Design Features

PDF AES-1: Lighting Design. The Project's lighting would be designed to adhere to the recommended lighting practices in the Attorney General's Warehouse Projects Best Practices. All Project lighting would be designed to be directed into the interior of the site. Additionally, all Project lighting would include use of full cut-off light shields and/or anti-glare lighting.

5.2 AGRICULTURE AND FORESTRY RESOURCES

Agriculture Threshold A Finding: The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use No impact would occur (Draft EIR page 5.2-4).

Facts in Support of Finding: The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. The Project site is identified as "Urban and Built-Up Land" by the California Department of Conservation's Important Farmland Finder. Additionally, the Project site is currently zoned as Industrial which does not allow for agricultural uses. Implementation of the proposed Project would therefore not involve the conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to urban uses. As a result, no impact would occur.

Agriculture Threshold B Finding: The Project would not conflict with existing zoning for agricultural use, or a Williamson act contract No impact would occur (Draft EIR page 5.2-5).

Facts in Support of Finding: The Project site is zoned Industrial, which does not provide for agricultural uses, and no agriculture uses exist adjacent to the site that would be affected by the Project's implementation. In addition, according to the California Department of Conservation's Williamson Act Enrollment Finder, the Project site is not under a Williamson Act Contract. Therefore, development of the proposed Project would not conflict with an existing Williamson Act contract or existing zoning for agricultural use. As a result, no impact would occur.

Agriculture Threshold C Finding: The Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned for timber production. No impact would occur (Draft EIR page 5.2-5).

Facts in Support of Finding: The Project site is zoned as Industrial, and is not zoned for forest land, timberland, or Timberland Preserve Zone (TPZ). Additionally, there are no forest lands, timberland, or zoned Timberland Production in proximity to the Project site. Therefore, the proposed Project would not result in impacts to forest land, timberland, or TPZ.

Agriculture Threshold D Finding: The Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur (Draft EIR page 5.2-5).

Facts in Support of Finding: The Project site is currently developed with industrial uses. No forest land exists on or adjacent to the Project site. The Project site is not zoned for forest land or timberland uses. Therefore, the proposed Project would not result in impacts related to loss or conversion of forest land to non-forest use

Agriculture Threshold E Finding: The Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agriculture use or conversion of forest land to non-forest use. No impact would occur (Draft EIR page 5.2-5).

Facts in Support of Finding: The Project site is not identified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland by the DOC's Important Farmland Finder map. Additionally, the proposed Project would not convert farmland to a nonagricultural use or convert forest land to a non-forest use. Therefore, the proposed Project would not involve other changes in the existing environment which, due to its location or nature, could result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use, and no impacts would occur.

Agriculture and Forestry Resources Cumulative Finding: The Project would not result in cumulative impacts to agriculture and forest resources (Draft EIR page 5.2-6)

Facts in Support of Finding: Based on the foregoing discussion under Threshold Agriculture A through E, the Project would not result in, or contribute to, a cumulatively significant impact to agriculture and forestry Resources.

5.3 AIR QUALITY

Air Quality Threshold A Finding: The Project would not conflict with or obstruct implementation of an applicable air quality plan (Draft EIR page 5.3-22).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant.

Facts in Support of Finding: The Project site has a General Plan land use designation of Industrial (I); the City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, commercial uses, and warehouse and distribution facilities. The Project site is zoned as Industrial (I) – Innovation District (ID) Overlay Zone. Within the ID Overlay Zone, the Project site is located within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The Project proposes an amendment to the City's zoning code and zoning map to change the site's Innovation District (ID) Overlay Zoning subdistrict from Employment Emphasis (EE) and Housing Emphasis (HE) to Industrial Emphasis (IE), which will allow for the proposed industrial buildings.

The General Plan land use designation of Industrial (I) allows for a maximum floor area ration (FAR) of 0.6. The proposed Project would result in includes two new industrial buildings – Building 1 would have footprint of 99,900 SF with a FAR of 0.45 and Building 2 would have a footprint of 97,700 SF with a FAR of 0.45, which is consistent with the land use designation for the site.

Additionally, the proposed Project is estimated to generate 194 permanent jobs at full buildout. The site's existing use was estimated to accommodate approximately 97 jobs; thus, the Project would result in an increase of 97 additional employment opportunities upon operation. However, as detailed in Section 5.14, *Population and Housing*, employment in the City of Riverside is expected to increase by 45,900 jobs between 2019 and 2050. Based on these growth projections, full buildout of the proposed Project represents approximately 0.4 percent of SCAG's projected employment growth within the City of Riverside. Thus, while the Project would result in a change in the site's zoning, the proposed Project would generate growth consistent with SCAG's growth forecasts and would not conflict with implementation of the AQMP under Consistency Criterion No. 1. As a result, no impacts related to SCAQMD AQMP Consistency Criterion No. 1 would occur.

Regarding Consistency Criterion No. 2, which evaluates the potential of the proposed Project to increase the frequency or severity of existing air quality violations, an impact related to Consistency Criterion No. 2 would occur if the long-term emissions associated with the proposed Project would exceed SCAQMD's regional significance thresholds for operation-phase emissions. The Project's net operational activities would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutants and impacts would be less than significant (Draft EIR Page 5.3-23). Therefore, the Project would not result in an increase in the frequency or severity of existing air quality violations, contribute to new violations, delay the timely attainment of air quality standards, or the interim emissions reductions specified in the AQMP. As a result, the proposed Project would result in less-than-significant impacts related to Consistency Criterion No. 2.

Thus, the Project would be consistent with SCAG's regional growth forecasts, and the Project would not lead to increased regional air quality construction or operational emissions that would exceed thresholds. The proposed Project would not result in a conflict with, or obstruct, implementation of the AQMP and impacts would be less than significant, and mitigation is not required.

Air Quality Threshold B Finding: The Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (Draft EIR page 5.3-23).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant.

Facts in Support of Finding:

Construction. Pollutant emissions associated with construction would be generated from the following construction activities: demolition, site preparation, grading, building construction, paving, and architectural coating. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. In addition, emissions would result from the import of approximately 9,043 CY of soil, a maximum export of 500 CY of potentially contaminated soil during the site preparation phase, and export of 24,092 tons of debris during the demolition phase (Final EIR Page 2-5).

Further, the Project would comply with SCAQMD Rules 403 and 1113, which are included as PPP AQ-1 and PPP AQ-2 and would reduce air contaminants during construction. As shown in Draft EIR Table 5.3-8, the Project would not exceed the construction SCAQMD significant thresholds, and therefore, mitigation is not required. Therefore, impacts related to construction air quality emissions would be less than significant.

Operation. Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as area sources, energy sources, mobile sources, off-road sources, and stationary sources. Operation of the proposed Project would include emissions from vehicles traveling to the Project site and from vehicles in the parking lots and loading areas. Off-road-source emissions would result from operation of forklifts, and stationary-source emissions would result from operation of fire pumps and emergency generators. As shown in Draft EIR Table 5.3-9, the Project's net operational activities would not exceed the SCAQMD's regional significance thresholds and therefore, mitigation is not required. Therefore, impacts related to operational air quality emissions would be less than significant.

Air Quality Threshold C Finding: The Project would not expose sensitive receptors to substantial pollutant concentrations (Draft EIR pages 5.3-25 – 5.3-29).

Facts in Support of Finding:

Construction: The daily construction emissions generated on-site by the proposed Project were evaluated against SCAQMD's localized significance thresholds (LSTs) to determine whether the emissions would cause or contribute to adverse localized air quality impacts. As shown in Draft EIR Table 5.3-10, the Project's construction emissions would not exceed the applicable SCAQMD LSTs at the nearest sensitive receptor. Therefore, impacts related to the exposure of sensitive receptors to substantial pollutant concentrations during construction would be less than significant.

Operation: LSTs apply to Project operational stationary and on-site mobile sources. The closest sensitive receptor to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site. Although the Project site is 10.12 acres, a threshold for 4 acres at a distance of 50 meters was used to provide a conservative analysis for localized operational emissions. As shown in DERI Table 5.3-11, the Project's operational emissions would not exceed the applicable SCAQMD LSTs at the nearest sensitive receptor. Therefore, impacts related to the exposure of sensitive receptors to substantial pollutant concentrations during operations would be less than significant.

Construction and Operational Health Risk: A Health Risk Assessment (HRA) (Draft EIR Appendix C), was prepared to evaluate the potential health impacts to sensitive receptors from the construction and operation of the proposed Project. The HRA focuses on the emissions of diesel particulate matter (DPM) from the operation of the heavy-duty diesel vehicles and off-road construction equipment that would be utilized for the construction of the proposed Project.

While the closest sensitive receptor to the Project site is a housing assistance shelter located at 2801 Hulen Place, approximately 67.3 meters east of the Project site, the housing assistance shelter has a maximum stay limit of 90 days. As a result, any exposure to the Project's construction and operational DPM emissions by individuals at the shelter would be temporary and limited in duration. In contrast, the nearest residential receptor, which is a single-family residence located 212 meters northeast of the Project site, would experience exposure to construction DPM emissions over a period of approximately 1.21 years, and operational emissions over the project's 30-year lifetime. The HRA determined that the most impacted residential sensitive receptor would be a single-family residence located at the northwest corner of Massachusetts Avenue and Chicago Avenue, approximately 574.5 meters east of the Project site. The nearest worker receptor is located 40 feet away, at a commercial building west of the Project boundary.

The estimated health risk impacts are compared to the health risk significance thresholds recommended by the SCAQMD for use in CEQA assessments of 10 persons per million for cancer risk and a health index of 1.0 for non-cancer health risks due to DPM exposure.

As shown in Draft EIR Table 5.3-12, during construction, the proposed Project would result in an estimated maximum cancer risk of 0.63 in one million for sensitive/residential receptors and an estimated maximum cancer risk of 0.58 in one million for worker receptors. In addition, the Project's maximum estimated construction results for non-cancer health risk are less than 0.01 for the maximum impacted sensitive receptor and 0.04 for the maximum impacted worker receptor, which is below the significance threshold of 1.0. As such, health risks impacts from Project construction activities related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

As shown in Draft EIR Table 5.3-13, during operation, the proposed Project would in an estimated maximum cancer risks for operations is 5.59 in one million for sensitive/residential receptors and an estimated maximum cancer risk of 4.04 in one million for worker receptors. In addition, the Project's maximum estimated operational results for non-cancer health risk are less than 0.01 for the maximum impacted sensitive receptor and 0.01 for the maximum impacted worker receptor, which is below the significance threshold of 1.0. As such, health risks impacts from Project operational activities related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

CO Hotspots: Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed Project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions.

An assessment of Project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate Project vicinity are not available. Ambient CO levels monitored at the Metropolitan Riverside County 1 Rubidoux station located 3.3 miles from the site (the closest station to the Project site monitoring CO) showed a highest recorded 1-hour concentration of 3.3 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 1.8 ppm (the State standard is 9 ppm) from 2021 to 2023. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

The proposed Project is anticipated to generate 487 net daily trips, including 74 net AM peak hour trips and 66 net PM peak hour trips (Draft EIR Page 5.3-29). Given the extremely low level of CO concentrations in the Project area, and limited number of vehicle trips during the peak hours, Project-related vehicles would not contribute significantly to result in the CO concentrations exceeding the State or federal CO standards. As such, impacts related to CO in regard to exposure of sensitive receptor to substantial pollutant concentrations would be less than significant.

Air Quality Threshold D Finding: The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant (Draft EIR page 5.3-36).

Facts in Support of Finding: Odors generated by the operation of the proposed Project are not expected to be significant or highly objectionable and would be required to be in compliance with SCAQMD Rule 402, which would prevent nuisances to sensitive land uses. During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. The noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials.

In addition, all Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable odors. Therefore, impacts associated with other operation- and construction-generated emissions, such as odors, would be less than significant.

Air Quality Cumulative Finding: The Project would not have a cumulatively adverse impact related to air quality (Draft EIR pages 5.3-30).

Facts in Support of Finding: The SCAQMD 2022 AQMP sets regional emission significance thresholds for construction and operation that apply to both project-specific and cumulatively-considerable impacts. Individual projects that would exceeds the SCAQMD's thresholds for project-specific impacts, then would also result in a cumulatively considerable net increase of these criteria pollutants. Projects that do not exceed SCAQMD's thresholds are considered to have a less than significant project specific and cumulative impact (Draft EIR Appendix B). As described in Air Quality Threshold A above, the Project would be consistent with SCAG's regional growth forecasts, and Project-generated air quality emissions would not exceed thresholds. Therefore, the proposed Project would not be cumulatively considerable and would be less than significant.

As described in Air Quality Threshold B above, emissions from construction would be below regional and localized thresholds for pollutants. In addition, emissions from Project operation would not exceed SCAQMD's thresholds for any criteria pollutant at the regional or local level after implementation of existing regulations. Therefore, construction and operational emissions would not be cumulatively considerable and would be less than significant.

As discussed in Air Quality Threshold C, the Project would not cause a significant localized emissions impact to adjacent land uses as a result of Project construction or operation activity. Therefore, impacts related to localized emissions would not be cumulatively considerable and would be less than significant.

Regarding DPM emissions, SCAQMD has applied a 1,000-foot distance from a proposed project to identify other development projects that could contribute to cumulative impacts with the proposed project. The search radius for this Project was extended to 0.25 miles (1,320 feet) to identify potential cumulative sources. There are two potentially concurrent projects within the 0.25-mile radius, both located near 2610 Durahart Street. These concurrent projects are an outdoor storage facility, inclusive of a 4,000 square-foot office building and a 2,000 square-foot workshop and an outdoor storage yard consisting of 52 truck trailer stalls.

The Traffic Impact Analysis (Draft EIR Appendix K)prepared for the proposed Project included a trip generation for proposed development projects within a 2-mile radius of the Project site (Draft EIR Page 5.3-31). The two projects described above are estimated to result in a daily trip generation of 53 passenger vehicle and trucks and 49 passenger vehicle and trucks, respectively. These two projects were estimated to

not generate over 100 truck trips per day. Pursuant to CARB's guidance, a cumulative health risk assessment would not be required for projects under this threshold. In addition, project-specific thresholds were established at levels intended to reduce cumulative health risk impacts. Therefore, project-specific thresholds are the same as cumulative thresholds. Since the Project would not exceed project-level thresholds, and there are no projects within the 0.25-mile buffer that warrant a cumulative analysis, the Project would also have a less than significant cumulative impact to cancer and non-cancer risks.

As discussed under Air Quality Threshold D, the Project would not expose surrounding uses to objectionable odors. Thus, there is no potential for odors from the Project to combine with odors from surrounding development Projects and expose nearby sensitive receptors to offensive odors. Therefore, the Project would not result in significant cumulative impacts related to odors.

Plans, Programs, and Policies

PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.

PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of SCAQMD Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.

PPP AQ-3: Rule 1470. The Project is required to obtain permits from SCAQMD for the proposed diesel fire pumps and emergency generators and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.

PPP AQ-4: Rule 402. The Project is required to comply with the provisions of SCAQMD Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Project Design Features

PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-3: The Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.

PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.

5.4 BIOLOGICAL RESOURCES

Impact Biological Resources Threshold A Finding: The Project would not have a substantially adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant (Draft EIR pages 5.4-20).

Facts in Support of Finding:

Special Status Plant Species: There are 13 sensitive plant species that have the potential to occur within the Project region. However, these special-status plant species do not have the potential to occur on the Project site due to lack of habitat. None of the special-status plant species were observed during the general biological surveys conducted on November 7, 2024. Therefore, no impacts related to special status plants would occur from the proposed Project.

Special Status Animal Species: There are 69 special status animal species that have the potential to occur within the Project region. However, habitat for these species does not exist on the site and none of the animal species were observed during the field survey (Draft EIR Appendix D Page 8). Therefore, no impacts related to special status wildlife would occur from the proposed Project.

Impact Biological Resources Threshold B Finding: The Project would not have an adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No impact would occur (Draft EIR Page 5.4-21).

Facts in Support of Finding: As described in the General Biological Assessment, the Project site does not contain or support any jurisdictional drainages, riparian, riverine and/or wetland features; additionally, no sensitive natural communities were observed during the field investigation. Thus, no impacts related to riparian habitat or other sensitive natural communities identified in local or regional plans would result from Project implementation.

Impact Biological Resources Threshold C Finding: The Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.)

through direct removal, filling, hydrological interruption, or other means. No impact would occur (Draft EIR Page 5.4-21).

Facts in Support of Finding: As described in the General Biological Assessment, the Project site does not contain natural wetlands. Therefore, the Project would not result in impacts to wetlands.

Impact Biological Resources Threshold E Finding: The Project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance. Impacts would be less than significant (Draft EIR page 5.4-22).

Facts in Support of Finding: The City's General Plan Open Space and Conservation Element includes policies related to MSHCP participation, protection of native plant communities, and wildlife migratory corridors. The proposed Project would be consistent with the MSHCP, and the site does not contain native plant communities or wildlife migratory corridors. Therefore, the Project would not conflict with the City's General Plan policies related to biological resources.

The proposed Project includes installation of trees along the perimeter of the site and adjacent street rights-of-way, including Roberta Street, Kansas Avenue, and Massachusetts Avenue, in accordance with the City's Urban Forest Tree Policy Manual. The City's Planning Division and Public Works, Urban Forestry Division would review the landscape plans and inspect the landscape installation to ensure all requirements are met. Therefore, potential impacts related to local policies or ordinances protecting biological resources would be less than significant.

Impact Biological Resources Threshold F Findings: The Project would not conflict with provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. No impact would occur (Draft EIR page 5.4-22)

Facts in Support of Finding: The Project site is located within a Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Area Plan. However, the site is not located within any Criteria Cells or Cell Groups. Additionally, the Project site is not located within any MSHCP designated species survey areas. The Project would be consistent with applicable Western Riverside County MSHCP as described in Draft EIR page 5.4-22. Therefore, the Project would not result in conflicts with the adopted habitat conservation plan, due to lack of suitable environment for the Western Riverside County MSHCP Covered Species. With payment of the required MSHCP fees, the Project would not result in any conflicts with the MSHCP, and no impact would occur.

5.5 CULTURAL RESOURCES

Impact Cultural Resources Threshold A Finding: The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 (Draft EIR page 5.5-10).

Facts in Support of Finding: The proposed Project would demolish the two structures on 2626 Kansas Avenue, which were constructed in 1946 and in 1948-1949. The Historic/Archaeological Resources Survey Report describes that since the buildings meet the 50-year age threshold for consideration as potential "historical resources," the buildings were recorded into the California Historical Resources Inventory with the temporary designation of CRM TECH 3758-1H, pending assignment of an official site number by the California Historical Resources Information System (CHRIS) (Appendix E). As described in the Report, the buildings have not been listed or formally determined eligible for listing in the California Register, nor have they been previously designated by the City of Riverside as being historically significant.

The Historic/Archaeological Resources Survey Report describes that the existing buildings represent long-standing elements of the lasting industrial area of the City of Riverside; however, neither of the two buildings are closely associated with any persons or events, either a specific event or a pattern of events, of recognized significance in national, state, or local history. Additionally, the utilitarian architectural, structural, engineering, and aesthetic merits of the buildings are not considered important or particularly remarkable examples of any style, property type, period, region, and method of construction, nor are they known to embody the work or accomplishment of any prominent architect, designer, or builder. Furthermore, the mid-20th century industrial growth theme that characterizes the buildings is well documented in historical accounts, contemporary literature, as well as archival records, both nationwide and in the City of Riverside, and thus these buildings hold little potential for any new or important data for the study of this subject.

Based on these considerations, the industrial buildings at 2626 Kansas Avenue do not appear eligible for listing in the National Register or the California Register, or for local designation by the City of Riverside as a "Landmark" or a "Resource of Merit." Therefore, the buildings do not meet the definition of a "historical resource" in the category of "discretionary historical resources," and the structures are not considered historical resources under CEQA. Implementation of the proposed Project would result in a less than significant impact related to historical resources.

Impact Cultural Resources Threshold C Finding: The Project would not disturb any human remains, including those interred outside of formal cemeteries (Draft EIR page 5.5-12).

Facts in Support of Finding: The Project site has been heavily disturbed and developed. It is not anticipated that implementation of the proposed Project would result in the disturbance of human remains. Existing regulation under the California Health and Safety Code, included as PPP CUL-1, outlines the procedures to undertake if human remains are found on the Project site. In the event of inadvertent discovery of human remains during Project construction, the State Health and Safety Code Section 7050.5 states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. Compliance with existing regulations would ensure impacts related to potential disturbance of human remains would be less than significant.

Cultural Resources Cumulative Finding: The Project would not result in cumulative impacts to cultural resources.

Facts in Support of Finding: Based on the foregoing discussion under Impacts Cultural Resources Threshold A through Cultural Resources Threshold C, the Project would not result in, or contribute to, a cumulatively significant impact to cultural resources.

Plans, Programs, and Policies

PPP CUL-1: Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that

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

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

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

5.6 ENERGY

Impact Energy Threshold A Finding: The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. Impacts would be less than significant (Draft EIR page 5.6-6 – 5.6-7).

Facts in Support of Finding:

Construction: Construction activities related to the proposed Project and the associated infrastructure are not expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Also, CCR Title 13, Motor Vehicles, Section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. The energy analysis modeling for the proposed Project shows that construction-related use of construction vehicles and off-road equipment would utilize approximately 59,818gallons of diesel fuel and 15,304 gallons of gasoline, as described in Draft EIR Appendix B. Construction activities would require limited energy consumption, would comply with all existing regulations, and would therefore not be expected to use large amounts of energy or fuel in a wasteful manner. Thus, impacts related to construction energy usage would be less than significant.

Operation: Once operational, the Project building would generate demand for electricity, natural gas, and petroleum (gasoline and diesel) for motor vehicle trips. Operational use of energy includes the fuel used for vehicle trips associated with the Project, heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity and water to areas where they would be consumed. The proposed Project includes the operation of two emergency generators and two fire pumps, that are assumed to operate for one hour per day for a total of 50 hours per year and two emergency generators that are assumed to operate for one hour per day for a total of 200 hours per year[1]. In addition, operation of 20 compressed natural gas

[1] Hours of operation are established in accordance with SCAQMD Rules 1470 and 1110.2, which limit diesel fire pumps to a maximum of 50 operating hours per year and emergency generators to 200 hours per year.

(CNG) forklifts was assumed. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

As detailed in Draft EIR Table 5.6-2, operation of the Project is estimated to result in a net (project minus existing) annual use 1,538,230 Kilowatt-Hours of electricity, 35,244 gallons of gasoline, and 418,296 gallons of diesel fuel. In addition, the proposed Project is estimated to annually use 3,635,956 thousand British Thermal Unit of natural gas. However, the operation of the Project would be similar to other similarly sized industrial projects within the City. Additionally, the proposed Project would be required to comply with existing regulations related to energy efficiency and consumption, such as Title 24 regulations and CCR Title 13, *Motor Vehicles*, Section 2449(d)(3) related to idling, as well as all applicable City energy codes. The Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. Therefore, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation and impacts would be less than significant.

Impact Energy Threshold B Finding: The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant (Draft EIR page 5.6-8 – 5.6-10).

Facts in Support of Finding: The proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. Typical Title 24 measures include insulation, use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC), solar-reflective roofing materials, energy-efficient indoor and outdoor lighting systems, reclamation of heat rejection from refrigeration equipment to generate hot water, and incorporation of skylights. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures and occurs during the permitting process, which ensures that all requirements are met. In addition, Project design and operation would comply with State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. The Project buildings would be solar ready in compliance with current Title 24 requirements, which would allow for the future installation of rooftop solar. As a result, the proposed Project would not conflict with or obstruct with CCR Title 24 energy efficiency standards.

The City's General Plan also includes various policies related to energy efficiency and energy conservation that are applicable to the proposed Project. As shown in Table 5.6-3 of the Draft EIR, the proposed Project would be consistent with the energy-related policies contained in the City's General Plan policies.

Therefore, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

Energy Cumulative Finding: The Project would not result in cumulative energy consumption which would be cumulatively wasteful, inefficient, or unnecessary nor conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant (Draft EIR page 5.6-10).

Facts in Support of Finding: Based on the foregoing discussion under Impacts Energy Threshold A through Energy Threshold B, the Project would not result in, or contribute to, a cumulatively significant impact to energy.

5.7 GEOLOGY AND SOILS

Impact Geology and Soils Threshold A(i) Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo earthquake fault zoning map, issued by the state geologist for the area or based on other substantial evidence of a known fault. No impact would occur (Draft EIR page 5.7-9).

Facts in Support of Finding: The Project site is not located within an Alquist-Priolo Earthquake Fault zone. The nearest active fault zones are the San Jacinto Fault Zone, located approximately 6 miles northeast of the Project site and the Elsinore Fault Zone, located approximately 17 miles southwest of the Project site. As such, impacts related to the surface rupture of a known earthquake fault would not occur on the Project site.

Impact Geology and Soils Threshold A(ii) Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving Strong seismic ground shaking. Impacts would be less than significant (Draft EIR page 5.7-9).

Facts in Support of Finding: The Project site is located within a seismically active region, with numerous faults capable of producing significant ground motions. However, seismic shaking is a risk throughout Southern California, and the Project site is not at greater risks of seismic activity or impacts as compared to other areas within the region.

The California Building Code (CBC) includes provisions to reduce impacts caused by major structural failures or loss of life resulting from earthquakes or other geologic hazards. Chapter 16 of the CBC contains requirements for design and construction of structures to resist loads, including earthquake loads.

The City has adopted the CBC as part of the Municipal Code (Chapter 16.08), which regulates all building and construction projects within the City and implements a minimum standard for building design and construction that includes specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. The Project would be required to be constructed in compliance with the CBC and the Municipal Code, included as PPP GEO-1. As such, the Project would result in a less than significant impact related to strong seismic ground shaking.

Impact Geology and Soils Threshold A(iii) Finding: directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Impacts would be less than significant (Draft EIR page 5.7-10).

Facts in Support of Finding: According to the *Riverside County Land Information Service Map My County*, the Project site is located within a zone of low liquefaction susceptibility. Additionally, during the Geotechnical Investigation, groundwater was not encountered during any of the drillings for the borings and groundwater on-site is expected to be around 116 to 129 feet bgs. The subsurface conditions encountered at the boring locations are not considered to be conducive to liquefaction because there is no evidence of a long-term groundwater table within the depths explored by the borings. The proposed Project would also be required to be constructed in compliance with the CBC and the City's Municipal Code, which would be verified through the City's plan check and permitting process (PPP GEO-1), and which would reduce risks related to seismic-related ground failure. Therefore, impacts related to liquefaction are expected to be less than significant.

Impact Geology and Soils Threshold A(iv) Finding: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No impacts would occur (Draft EIR page 5.7-10).

Facts in Support of Finding: The Project site has relatively flat topography and it has been graded and developed with industrial uses and a bus storage yard. There are no slopes on the Project site or within the immediate vicinity of the Project site. Therefore, no impacts would occur related to landslides from with implementation of the Project.

Impact Geology and Soils Threshold B Finding: The Project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant (Draft EIR page 5.7-10).

Facts in Support of Finding:

Construction: Construction of the proposed Project has the potential to contribute to soil erosion and the loss of topsoil. Grading activities that would be required for the Project would expose and loosen topsoil, which could be eroded by wind or water. However, Riverside Municipal Code Chapter 17.16.010 requires the preparation of an erosion control plan prior to the issuance of grading permits. Furthermore, to reduce the potential for soil erosion and the loss of topsoil, construction activities would require a SWPPP, which is mandated by the National Pollution Discharge Elimination System (NPDES) General Construction Permit. The SWPPP is required to address site-specific conditions related to specific grading and construction activities that could cause erosion and the loss of topsoil and provide erosion control BMPs to reduce or eliminate the erosion and loss of topsoil. Erosion control BMPs include use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. Upon compliance with Municipal Code Section 17.15.010, *Stormwater Management Requirements*, RWQCB SWPPP requirements, and installation of BMPs, which would be verified by the City's Public Works Department as part of Project permitting, construction impacts related to erosion and loss of topsoil would be less than significant.

Operation: The proposed Project includes installation of landscaping adjacent to the proposed buildings and throughout the proposed parking areas. With this landscaping, areas of exposed topsoil that could erode by wind or water would not exist upon operation of the proposed Project. Furthermore, implementation of the Project requires City approval of a Water Quality Management Plan (WQMP), which would ensure that RWQCB requirements and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, with implementation of existing requirements, impacts related to substantial soil erosion or loss of topsoil would be less than significant.

Impact Geology and Soils Threshold C Finding: The Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse. Impacts would be less than significant (Draft EIR page 5.7-11).

Facts in Support of Finding: The Project site does not contain, nor is it adjacent to, any significant slope or hillside area. The proposed Project would also not create slopes. Thus, on or off-site landslides would not occur from implementation of the proposed Project. Furthermore, the Geotechnical Investigation found that the site possesses a low liquefaction potential. Additionally, because the site is relatively flat, the potential for earthquake-induced lateral spreading is considered low at the site. Therefore, impacts related to liquefaction and lateral spreading are not anticipated at the Project site.

Compliance with the requirements of the CBC and related recommendations in the Geotechnical Investigation related to compaction of soils and development of foundations is required as part of the building plan check and development permitting process, and would reduce potential impacts related to lateral spreading, liquefaction, subsidence, and ground collapse to a less than significant level.

Impact Geology and Soils Threshold D Finding: The Project would not be located on expansive soils, as defined in Table 18-1-B pf the Uniform Building Code (1994) and would not create substantial risks to life or property. Impacts would be less than significant (Draft EIR page 5.7-11).

Facts in Support of Finding: The Geotechnical Investigation describes that the Project site's near-surface soils consist of loose to medium dense silty fine sands and silty sands with trace amounts of medium to coarse sands and fine gravel. According to the Geotechnical Investigation, these materials are considered non-expansive. In addition, compliance with the CBC is a standard City practice and is included as a condition of approval. Therefore, compliance with the requirements of the CBC as part of the building plan check and development review process, would ensure that impacts related to expansive soil would be less than significant.

Impact Geology and Soils Threshold E Finding: The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. No impact would occur (Draft EIR page 5.7-12).

Facts in Support of Finding: The Project would not use septic tanks or alternative wastewater disposal systems. The Project includes the construction of an on-site sewer system that would connect to a new off-site sewer main in Kansas Avenue and Massachusetts Avenue. As a result, no impacts related to septic tanks or alternative wastewater disposal systems would occur from implementation of the proposed Project.

Plans, Programs, and Policies

PPP GEO-1: CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in Chapter 16.08 of the Riverside Municipal Code to preclude significant adverse effects associated with seismic and soils hazards. CBC-related and geologist and/or civil engineer specifications for the proposed Project are required to be incorporated into grading plans and building specifications as a condition of construction permit approval.

5.8 GREENHOUSE GAS EMISSIONS

Impact GHG Threshold A Finding: The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant (Draft EIR page 5.8-11 – 5.8-12).

Facts in Support of Finding: Implementation of the proposed Project would generate GHG emissions from demolition, construction activities, haul trips, vendor trips, and construction worker vehicle trips. As shown in Draft EIR Table 5.8-1, the Project would emit a total of 844 Annual $MTCO_2e$ over the duration of construction, with 2026 having the highest emission level (821 $MTCO_2e$). Amortized over 30 years, the Project's construction emissions would be approximately 28 $MTCO_2e$ per year.

Long-term operations of uses proposed by the Project would also generate GHG emissions from vehicle trips, electricity and natural gas consumption, water and wastewater transport (the energy used to pump water), and solid waste generation. However, the Air Quality, Energy, and GHG Impact Analysis prepared for the proposed Project describes that the GHG emissions generated from the proposed Project at buildout are primarily associated with non-construction related mobile sources, such as vehicle and truck trips. The annual GHG emissions associated with the proposed Project are summarized in Draft EIR Table 5.8-2. As shown, construction and operation of the Project would generate a net total of approximately 7,272 $MTCO_2e$ per year, which would not exceed the screening threshold of 10,000 $MTCO_2e$ per year. Therefore, impacts would be less than significant.

Impact GHG Threshold B Finding: The Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. Impacts would be less than significant (Draft EIR page 5.4-11 - 5.8-18).

Facts in Support of Finding: The proposed Project would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's Updated Scoping Plan (2022), as demonstrated below. CARB's 2022 Scoping Plan reflects the 2045 target of an 85 percent reduction below 1990 levels, set by Executive Order B-55-18, and codified by AB 1279. In addition, the Project would be consistent with the following State policies that were adopted for the purpose of reducing GHG emissions: Pavley Emissions Standards and Low Carbon Fuel Standard, Medium/Heavy-Duty Vehicle Regulations, Tractor-Trailer Greenhouse Gas Regulation, Energy Efficiency – Title 24/CALGreen, Renewable Portfolio Standard, Million Solar Roofs Program, and the Water Efficiency and Waste Diversion.

In addition, as detailed in Draft EIR Table 5.8-3, the Project would not conflict with the CARB 2022 Scoping Plan; and, as detailed on Draft EIR Tables 5.8-4 and 5.8-5, the project would be consistent with the City's General Plan policies and Climate Action Plan policies related to GHG.. Overall, the Proposed Project would conform to state and local GHG emissions reduction and climate change regulations, policies, and strategies. Impact would be less than significant.

Greenhouse Gas Emissions Cumulative Finding: The Project would not result in cumulative impacts related to GHG emissions. Impacts would be less than significant (Draft EIR page 5.8-18).

Facts in Support of Finding: GHG emissions impacts are assessed in a cumulative context, since no single project can cause a discernible change to climate. Therefore, the area in which a proposed project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city, or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the State's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

The analysis of GHG emission impacts under CEQA contained in the Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. The estimated GHG emissions from development and operation of the Project would not exceed SCAQMD thresholds and the proposed Project would be consistent with relevant plans, policies, and programs adopted for the purpose of reducing the emissions of GHGs. Therefore, the Project would not result in cumulatively considerable GHG impacts and cumulative GHG impacts would be less than significant.

5.9 HAZARDS AND HAZARDOUS MATERIALS

Impact Hazards and Hazardous Materials Threshold C Finding: The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. No impacts would occur (Draft EIR page 5.9-22).

Facts in Support of Finding: The Project site is not located within 0.25-mile from an existing or proposed school. The closest schools to the Project site are Springs Charter Schools, located at 3050 Chicago Ave., Riverside, approximately 0.4 miles southeast of the Project site. Therefore, no impacts would occur.

Impact Hazards and Hazardous Materials Threshold D Finding: The Project would not be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create a significant hazard to the public or the environment. Impacts would be less than significant (Draft EIR page 5.9-22).

Facts in Support of Finding: The Phase I Environmental Site Assessment that was conducted included database searches, including the SWRCB GeoTracker website or the DTSC EnviroStor websites, to determine if the Project site is identified as a hazardous materials site. The record searches determined that although the site has a history of various uses and SARWQCB Cleanup Program Site case due to PCE and TCE impacts in soil, soil vapor, and groundwater, the Project site is not included on the Cortese List of hazardous materials sites pursuant to Government Code Section 65962.5.

No adjacent sites that are included on a Cortese List of hazardous materials sites compiled pursuant to Government Code Section 65962 were identified. One Federal Superfund site, Alark Hard Chrome, is located at 2777 Man Street, Riverside, approximately 0.6 miles northwest of the Project site. However, due to its distance and its hydraulically cross-gradient position relative to the site[2], the property was not subjected to further evaluation. As a result, impacts from implementation of the proposed Project related to hazards from being located on or adjacent to a hazardous materials site included on a Cortese List would be less than significant.

Impact Hazards and Hazardous Materials Threshold F Finding: The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No impact would occur (Draft EIR page 5.9-23).

Facts in Support of Finding:

Construction: The proposed construction activities, including equipment and material staging and storage, would occur within the Project site and would not obstruct emergency vehicle access to the site or surrounding areas. Construction of new driveways and utility connections would not require full closure of Kansas Avenue, Roberta Street, or Massachusetts Avenue. Any temporary lane closures necessary for utility tie-ins or roadway improvements would be subject to City-approved traffic control measures under construction permits, ensuring continued emergency access.

Implementation of City permitting requirements would ensure construction-related activities do not interfere with emergency access or evacuation. The Project would result in no impact.

Operation: Direct site access would be provided via new driveways on Kansas Avenue, Roberta Street, and Massachusetts Avenue. Driveways and internal circulation would be designed in compliance with City standards, reviewed and approved through the City's permitting process, to ensure adequate emergency access. The Project is also required to provide fire suppression facilities (hydrants, sprinklers) consistent with Fire Department standards, and final development plans would be reviewed by the Building Department for compliance with Section 503 of the California Fire Code (Title 24, CCR, Part 9).

Operation of the proposed Project would not interfere with an adopted emergency response plan or emergency evacuation plan. The Project operations would not result in significant impacts.

[2] The Alark Hard Chrome property is neither upstream nor downstream of the site in terms of groundwater flow.

Impact Hazards and Hazardous Materials Threshold G Finding: The Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. No impact would occur (Draft EIR page 5.9-23 – 5.9-24).

Facts in Support of Finding: According to CAL FIRE's Fire Hazard Severity Zone Maps, the Project site is not located within a Fire Hazard Severity Zone (FHSZ). Because the Project Site and surrounding vicinity is an urbanized community, structural fires rather than wildland fires represent the greatest fire risk. The proposed Project is within an urban area that is adjacent to existing industrial uses and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. In addition, the proposed Project would be constructed in compliance with the California Fire Code and California Building Code. The safety measures under the California Fire Code include ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system, and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or embers. The California Building Code requirements include CCR Title 24, Part 2, which provides specific requirements related to exterior fire exposure. Compliance with existing regulatory requirements for implementation of fire protection measures (e.g., ignition-resistant construction materials and measures) would further reduce impacts associated with fire spread. Thus, the proposed Project would not result in any impact related to exposure of people or structures to significant risk involving wildland fires.

5.10 HYDROLOGY AND WATER QUALITY

Impact Hydrology Threshold A Finding: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater. Impacts would be less than significant.(Draft EIR page 5.10-9 – 5.10-13).

Facts in Support of Finding:

Construction: Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

However, pursuant to City of Riverside Municipal Code Chapter 14.12, each discharger associated with industrial/commercial activity or construction activity shall comply with all requirements of the NPDES permit, as may be issued by the USEPA, the SWRCB, or the Santa Ana RWQCB, and the City's development construction program. Construction activity resulting in a land disturbance of one acre or more, or less than one acre but part of a larger common plan of development or sale, must obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP). The existing NPDES Construction General Permit requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer (QSD) for construction activities that disturb one acre or more of soil, as included in PPP HYD-1. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by

a Qualified SWPPP Practitioner (QSP) would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities.

Therefore, compliance with the State Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ) and the City of Riverside Municipal Code, as well as other applicable requirements, would be verified during the City's construction permitting process and would ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

Operation: The Project site is within the Middle Santa Ana River Watershed and drains to the Santa Ana River Reach 3. Reach 3 of the Santa Ana River is listed as an impaired water body for pathogens on the 2022 CWA Section 303(d) List of Water Quality Limited Segments Being Addressed by USEPA Approved TMDLS. Currently, the site is approximately 56 percent impervious. The proposed Project would add 394,063 SF of impervious area (resulting in 89 percent of the site area) and would have approximately 5 percent of the Project site as pervious landscaping. Landscape and irrigation plans would be submitted to the City during the permitting process and must include plants approved by the City in order to ensure the use of low-water plants and follow local and State requirements for efficient water use. Therefore, adherence to local and State requirements, as confirmed during the permitting process, would reduce the use of groundwater and maximize infiltration.

Increases in impervious surface area would result in an increase in the volume and flow rate of surface runoff and potential pollutants from vehicles. Operation of the proposed land uses could generate pollutants including trash, debris, oil residue, and other residue that could be deposited on streets, sidewalks, driveways, paved areas, and other surfaces and wash into receiving waters. Pollutants have the potential to further exacerbate existing impairments of local water bodies.

Proposed drainage improvements would include construction of grate inlets and catch basins to convey runoff to an on-site underground storm drain system that would discharge to two underground detention/infiltration systems. Overflow for detention/infiltration system A would be conveyed to Roberta Street and from detention/infiltration system B to Kansas Avenue. The proposed Project's stormwater system would provide improved infiltration compared to existing conditions.

In compliance with the NPDES MS4 Permit and the City's Municipal Code Chapter 14.12, development projects are required to implement a WQMP, included as PPP HYD-2. Source control BMPs and LID BMPs included in the WQMP would avoid potential quality degradation of receiving waters resulting from the proposed Project. As part of permitting approval process, the City's Public Works Department would review construction plans for grading, drainage, erosion control, and water quality to ensure regulatory compliance and implementation of the applicable and required BMPs in the WQMP. A WQMP has been prepared per these requirements, inclusive of BMPs. Overall, compliance with existing laws and regulations and implementation of the WQMP (included as PPP HYD-2) would ensure that implementation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality, and impacts would be less than significant.

Impact Hydrology Threshold B Finding: The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the Basin. Impacts would be less than significant (Draft EIR page 5.10-13 – 5.10-14).

Facts in Support of Finding: The Project site lies within the boundaries of the Upper Santa Ana Valley Groundwater Basin and is underlain by the adjudicated portion (Riverside Basin) of the Riverside-Arlington

Groundwater Subbasin. The Sustainable Groundwater Management Act (SGMA) of 2014 created a statewide framework to help protect groundwater resources over the long-term. SGMA requires local agencies to form Groundwater Sustainability Agencies (GSAs) for high and medium priority basins. GSAs are required to then develop and implement Groundwater Sustainability Plans (GSPs) to avoid undesirable results and mitigate overdraft within 20 years. Low priority basins are not required to form GSAs or GSPs at this time. The Riverside-Arlington Groundwater Subbasin has been identified by the California Department of Water Resources as a very low-priority groundwater basin that is not required to form a GSA or GSP. Additionally, the Riverside Basin of the Riverside-Arlington Groundwater Subbasin is exempt from this requirement due to the adjudication. Therefore, the proposed Project would not conflict with the SGMA.

Riverside Public Utilities (RPU) provides water service to most of the City, including the Project site. RPU's primary source of water supply is local groundwater. Most of RPU's groundwater comes from basins that have already been adjudicated. The water that would be provided to the Project would be through RPU and at adjudicated quantities. Therefore, the proposed Project would not conflict with the groundwater basin adjudications and would not impede existing groundwater management. Thus, the proposed Project would not substantially decrease groundwater supplies.

Development of the proposed Project would result in 394,063 SF of impervious area (resulting in 89 percent of the site area). Runoff from the site would be collected via grate inlets and catch basins and conveyed into a network of storm drain pipes that eventually connect to two on-site underground detention/infiltration systems. Detention/infiltration System A would be located under the passenger drive aisle in the northwest portion of the site with overflow directed to Roberta Street, while System B would be located beneath the Building 1 truck court with overflow directed to Kansas Avenue. Upon completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing off-site flows. A WQMP has been prepared for the proposed Project and it includes various BMPs to be incorporated into the Project design to protect water quality and increase the infiltration rate within the site. The proposed stormwater system would provide improved infiltration and groundwater recharge capabilities compared to existing conditions. Therefore, the Project would not substantially impede groundwater recharge of the Project site.

Compliance with the NPDES MS4 permit requirements, the City's Municipal Code, and other applicable requirements implemented through the WQMP, which would be verified during the Project permitting process, would ensure that Project impacts related to groundwater depletion and recharge would be less than significant.

Impact Hydrology Threshold C Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant (Draft EIR page 5.10-14 - 5.10-15).

Facts in Support of Finding:

Construction: Construction of the Project would require site clearing and grading. Excavation, grading, and other site preparation activities would loosen soils, which has the potential to result in erosion and the loss of topsoil. Also, the Project site is generally flat and does not contain substantial slopes that could induce erosion or siltation, which refers to the accumulation of silt (fine particles of sand, mud, and other materials) in a body of water. The existing NPDES Construction General Permit, as included as PPP HYD-1, requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for construction activities that disturb one-acre or more of soils. The SWPPP is required to address site-specific conditions related to

potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

Overall, with implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion or siltation would be less than significant.

Operation: The existing drainage pattern for the site generally flows from southeast to northwest. Runoff from the site would be collected via grate inlets and catch basins and conveyed into a network of storm drain pipes that eventually connect to two on-site underground infiltration systems. Overflow from detention/infiltration System A would be conveyed to Roberta Street and overflow from detention/infiltration System B would be conveyed to Kansas Avenue. In the post-project condition, the drainage characteristics would be maintained as similar to the pre-Project condition.

The Project site would be mostly developed with impervious surfaces and onsite landscaping would minimize the potential for erosion or siltation on site. The Project would include implementation of BMPs designed to fully capture and infiltrate stormwater pursuant to NPDES MS4 requirements, thereby reducing off-site stormwater flows. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Public Works Department to ensure that they meet the NPDES MS4 Permit and limit the potential for erosion and siltation. Therefore, impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant.

Impact Hydrology Threshold D Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant (Draft EIR page 5.10-14 – 5.10-15).

Facts in Support of Finding:

Construction: Construction of the proposed Project would include activities that could temporarily alter the existing drainage pattern of the site, for example by constructing foundations and paved areas, and could result in flooding on- or offsite if drainage is not properly controlled. However, implementation of the Project requires a SWPPP that would address site-specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes diverting runoff from rooftops and other impervious surfaces to vegetated areas, when possible, to promote infiltration and controlling the perimeter of site using sandbags, berms, and silt fencing. These regulations would ensure that the rate or amount of surface runoff would not substantially increase during the construction phase relative to existing conditions. Therefore, impacts related to rate or amount of surface runoff during construction would be less than significant.

Operation: The proposed Project would result in an increase in impervious areas onsite. As a result, the Project would increase surface flows compared to existing conditions. However, the proposed Project includes installation of new stormwater drainage facilities, including two underground infiltration systems, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect onsite flows via grate inlets and catch basins.

Proposed onsite drainage infrastructure has capacity to peak flows from a 100-year storm event, consistent with the NPDES MS4 Permit requirements. Overflow from detention/infiltration System A would be conveyed

to Roberta Street and overflow from detention/infiltration System B would be conveyed to Kansas Avenue. Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the onsite infiltration systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed Project is not anticipated to result in flooding conditions to upstream or downstream properties with the implementation of BMPs identified in the WQMP. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City Department of Public Works to ensure that they meet the NPDES MS4 Permit requirements and would not result in flood impacts.

Overall, the drainage facilities proposed for the Project have been sized to be consistent with the NPDES MS4 permit requirements. Thus, implementation of the Project would not increase the rate or amount of surface runoff, such that flooding would occur. Impacts during operations would be less than significant.

Impact Hydrology Threshold E Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant (Draft EIR page 5.10-16).

Facts in Support of Finding: The Project site currently is approximately 56 percent impervious. Development of the proposed Project would add 394,063 SF of impervious area, increasing the site impervious area to 89 percent. The Project site currently drains from southeast to northwest. Stormwater on the northern portion of the site is currently directed to on-site v-gutters and conveyed to Roberta Street and Kansas Avenue, while stormwater on the southern portion currently flows overland in a southeast-to-northwest direction toward Kansas Avenue.

The proposed underground infiltration systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed drainage facilities have been sized to adequately accommodate the stormwater flows from the proposed development and are consistent with the City's drainage plans and NPDES MS4 Permit requirements, with a capacity to retain peak flows from a 100-year storm event. Overflow from detention/infiltration System A would be conveyed to Roberta Street and overflow from detention/infiltration System B would be conveyed to Kansas Avenue. Implementation of the Project would maintain existing drainage patterns of the Project site. The WQMP prepared for the proposed Project includes various BMPs to be incorporated into the Project design to protect water quality. Therefore, the proposed Project is not anticipated to result in flooding conditions or substantial additional sources of polluted runoff to upstream or downstream properties with implementation of BMPs identified in the WQMP. Overall, the proposed drainage improvements would be consistent with City standards and NPDES MS4 permit requirements. Therefore, Project impacts would be less than significant.

Impact Hydrology Threshold F Finding: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. Impacts would be less than significant (Draft EIR page 5.10-17).

Facts in Support of Finding: The Project site generally drains from southeast to northwest. Implementation of the Project would maintain existing drainage patterns of the Project site, for example by constructing foundations and paved areas, and could result in flooding on- or offsite if drainage is not properly controlled. However, implementation of the Project requires a SWPPP that would address site specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding

or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the NPDES MS4 Permit and a SWPPP, as verified by the City through the construction permitting process, would prevent construction-related impacts related to potential impediment or redirection of flood flows.

Per the FEMA's Flood Map Service Center, the Project is within Zone X, an area determined to be outside of the 0.2 percent annual chance floodplain (Map Number 06065C0726H). The Project site would result in an increase in impervious areas thus the Project would increase surface flows compared to existing conditions. However, the proposed Project would include installation of new stormwater drainage facilities, including two underground infiltration systems, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect onsite flows via grate inlets and catch basins. Proposed onsite drainage infrastructure has capacity to retain peak flows from a 100-year storm event, consistent with the NPDES MS4 Permit requirement. Overflow from detention/infiltration System A would be conveyed to Roberta Street and overflow from detention/infiltration System B would be conveyed to Kansas Avenue. Implementation of the Project would maintain existing drainage patterns of the Project site. The use of the underground infiltration systems would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the offsite drainage system. The proposed flowrate would be lower than the existing flowrate. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City Department of Public Works to ensure that they meet the NDPDES MS4 Permit requirements and would not result in flood impacts. The Project site is not within an existing floodplain and would not contribute to increased flooding. Thus, implementation of the Project would not impede or redirect flood flows and impacts would be less than significant.

Impact Hydrology Threshold G Finding: The Project would not be located in flood hazard, tsunami, or seiche ones, and risk release of pollutants due to Project inundation. Impacts would be less than significant (Draft EIR page 5.10-17).

Facts in Support of Finding: According to FEMA FIRM Map 06065C0726H, the Project site is located in "Zone X," which is an area located outside of the 100-year and 500-year flood plains. Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis would occur. Additionally, the Project site does not contain and is not adjacent to any water bodies that could seiche. The nearest body of water is the Santa Ana River, approximately 1.8 miles to the west, which is not a contained body of water with seiche potential. Therefore, the Project would result in no impacts related to release of pollutants due to Project inundation in flood hazards, tsunami, or seiche zones.

Impact Hydrology Threshold H Finding: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant (Draft EIR page 5.10-18).

Facts in Support of Finding: The site is approximately 56 percent impervious in the existing condition. Development of the proposed Project would add 394,063 SF of impervious area, increasing the site impervious area to 89 percent. The proposed storm drain system is sized to adequately accommodate increased stormwater flows from the Project area and would maintain the existing drainage pattern of the site. Runoff would discharge and be treated into the two underground infiltration systems onsite that would filter and infiltrate stormwater into the site soils and potentially the groundwater. The Project would not conflict with or obstruct implementation of the SGMA. The City is within the jurisdiction of the Santa Ana RWQCB (Region 8). The Santa Ana RWQCB sets water quality standards for all ground and surface waters within its region through implementation of a Water Quality Control Plan (Basin Plan). This Basin Plan gives direction on the beneficial uses of the State waters within Region 8, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve

the established standards. The NPDES MS4 Permit, incorporated in the City's Municipal Code Chapter 14.12, requires development projects to prepare and implement a WQMP, which is included as PPP HYD-2. The WQMPs are required to include BMPs for source control, site design, and treatment control. The WQMP would be reviewed and approved by the City's Public Works Department prior to issuance of grading permits to ensure compliance. The City's permitting process would ensure that all BMPs in the WQMP are constructed during implementation of the Project. As discussed under Threshold B, the Riverside Basin of the Riverside-Arlington Groundwater Subbasin is adjudicated, and therefore, is not subject to a sustainable groundwater management plan. Thus, the Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Hydrology and Water Quality Cumulative Impact Finding: The Project would not result in cumulative impacts related to hydrology and water quality (Draft EIR page 5.10-18 – 5.10-19).

Facts in Support of Finding: The areas considered for cumulative impacts to hydrology and water quality are the Middle Santa Ana River Watershed for drainage and water quality impacts, and the Riverside-Arlington Groundwater Subbasin for groundwater impacts.

Water Quality: The geographic scope for cumulative impacts related to hydrology and water quality includes the Middle Santa Ana River watershed because cumulative projects and developments pursuant to the proposed Project could incrementally exacerbate the existing impaired condition and could result in new pollutant-related impairments. Related developments within the watershed would be required to implement water quality control measures pursuant to the same NPDES General Construction Permit that requires implementation of a SWPPP (for construction), a WQMP (for operation) and BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, and increase filtration and infiltration. The NPDES permit requirements have been set by the SWRCB and implemented by the Santa Ana RWQCB (and Riverside Municipal Code) to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water quality associated with present and future development in the watershed would not be cumulatively considerable upon compliance with all applicable laws, permits, ordinances and plans. The proposed Project would be implemented in compliance with all regulations, as would be verified during the permitting process. Therefore, cumulative impacts related to water quality would be less than significant.

Drainage: The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. The proposed Project includes installation of two underground infiltration systems that would retain, slow, filter, and infiltrate peak flows of a 100-year storm event. These facilities would retain runoff and reduce erosion and siltation. In addition, pursuant to State and regional regulations that require development projects to maintain pre-project hydrology, no net increase of offsite stormwater flows would occur. As a result, the proposed Project would not generate runoff that could combine with additional runoff from cumulative projects that could cumulatively combine to impact erosion, siltation, flooding, and water quality. Thus, cumulative impacts related to drainage would be less than significant.

Groundwater Basin: The geographic scope for cumulative impacts related to the groundwater basin is the Riverside-Arlington Groundwater Subbasin. As described above, the proposed Project includes installation of underground infiltration systems that would recharge stormwater into the groundwater basin. In addition, the volume of water that would be needed by the Project is within the anticipated groundwater pumping volumes since the basin is adjudicated. Therefore, the Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. As a result, the proposed Project would not generate impacts related to the groundwater basin that have the potential to combine with effects from

other projects to become cumulatively considerable. Therefore, cumulative impacts related to the groundwater basin would be less than significant.

Plans, Programs, and Policies

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: WQMP. Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City's Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.

5.11 LAND USE AND PLANNING

Impact LU-1 Finding: The Project would not physically divide an established community. No impact would occur (Draft EIR page 5.11-10).

Facts in Support of Finding: Implementation of the proposed Project would not divide an established community. The Project would demolish existing buildings onsite and redevelop 10.21 acres with two industrial warehouse buildings as 99,900 SF and 99,950 SF. The Project includes a zoning code and map amendment to change the site's ID Overlay Zoning subdistrict from EE and HE to Industrial Emphasis (IE), consistent with the proposed industrial buildings and the General Plan. As detailed in Table 5.11-1 of the Draft EIR, the proposed Project would be consistent with the existing land use designation and proposed zoning designation. In addition, the proposed Project would not change roadways in a manner that would inhibit access or install any infrastructure that would result in a physical division. The proposed Project includes development of internal roadways, infrastructure, and sidewalks that would connect to adjacent roadways and surrounding land uses. Therefore, the proposed Project would not have an impact on an established community.

Impact LU-2 Finding: The Project would not cause a significant environmental impact due to conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant (Draft EIR page 5.11-11).

Facts in Support of Finding: The Project site has a General Plan Land Use designation of Industrial (I). As described above, the Project includes an amendment to the City's zoning code and zoning map to change the site's ID Overlay Zoning subdistrict from EE and HE to IE so that the zone is consistent with the proposed industrial buildings and the General Plan. Furthermore, as shown in Draft EIR Table 5.11-1, the proposed Project would be consistent with the applicable City General Plan Policies adopted to avoid or mitigate an environmental effect. In addition, the Project would not conflict with the adopted SCAG's Regional Transportation Plan/ Sustainable Communities Strategy Policies as shown in Draft EIR Table 5.11-2. The proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect, and impacts would be less than significant.

Land Use and Planning Cumulative Finding: The Project would not result in cumulative impacts to land use and planning. Impacts would be less than significant (Draft EIR page 5.11-25).

Facts in Support of Finding: Cumulative projects in the City of Riverside would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Cumulative projects in the City of Riverside would utilize regional planning documents such as SCAG's RTP/SCS during planning, and the City of Riverside 2035 General Plan would be consistent with the regional plans, to the extent that they are applicable. Cumulative projects in this jurisdiction would be required to comply with the applicable land use plan or they would not be approved without a general plan amendment.

The proposed Project would be consistent with the City of Riverside 2035 General Plan land use designation. Furthermore, the proposed zone change would provide consistency with the General Plan land use designation and development standards of the Overlay Zone subdistrict. Past and present cumulative projects do not involve amendments that would remove policies designed to avoid or mitigate environmental effects, and determining future projects' potential amendments and subsequent cumulative effects would be speculative. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would be less than significant.

5.12 MINERAL RESOURCES

Impact MIN-1 Finding: The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Impacts would be less than significant (Draft EIR page 5.12-3).

Facts in Support of Finding: The Project site is not used for mining or mineral extraction operations and is currently developed with a commercial/industrial building and bus parking and storage. Classified MRZ-4, the site is not located in an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Therefore, implementation of the Project would not result in the loss of availability of a valuable known mineral resource and impacts to mineral resources would be less than significant.

Impact MIN-2 Finding: The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on the general plan, specific plan, or other land use plan. No impact would occur (Draft EIR page 5.12-3).

Facts in Support of Finding: The Project site has a General Plan land use designation of Industrial (I). The primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling, support commercial uses, limit large warehouse and distribution facilities only at specific locations. The Industrial land use designation does not support mineral resource related uses, and the site is currently developed with a commercial/industrial building, bus parking, and storage. As such, the Project site land use designation is not compatible with the extraction of mineral resources. Therefore, the proposed Project would result in no impact to mineral resource recovery sites delineated on a land use plan.

Cumulative Impact Finding: The Project would not result in cumulative impacts related to mineral resources. Impacts would be less than significant (Draft EIR page 5.12-3).

Facts in Support of Finding: The proposed Project's potential to result in cumulatively considerable impacts to mineral resources are analyzed in conjunction with other projects located in the City of Riverside General

Plan area. A majority of the land within the City is designated as MRZ-4, which are areas with insufficient data to determine if there are significant mineral resources in the area. The nearest State classified mineral resource zone (MRZ-2) to the Project site is located approximately 0.75 miles north of the Project site. As detailed above, the proposed Project would not result in significant impacts to mineral resources. Thus, implementation of the Project would not result in significant impacts to mineral resources and impacts would not be cumulatively considerable.

5.13 NOISE

Impact NOI-1 Finding: The Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies Impacts would be less than significant (Draft EIR page 5.13-15 – 5.13-20).

Facts in Support of Finding:

Construction: Potential noise impacts associated with the construction of the proposed Project would be from construction-generated vehicular traffic on the nearby roadways and from noise generated from construction equipment onsite. Construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project would incrementally increase noise levels on access roads leading to the site. As described in the Draft EIR, approximately 5,956 acoustically equivalent trips would occur during an average day from worker and delivery activities, however, the expected noise increase would be 1.7 dBA, which is below the threshold of 3 dBA noise level increase and would not be perceptible to the human ear in an outdoor environment. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the Project site would be less than significant.

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that can reach high levels when combined. Table 5.13-7 of the Draft EIR lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor. The Project construction composite noise levels at a distance of 50 feet would range from 74 dBA Leq to 88 dBA Leq, with the highest noise levels occurring during the site preparation and grading phases. Per City of Riverside Municipal Code Section 7.35.020(G), construction activities are prohibited between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. The proposed Project's construction activities would occur pursuant to these regulations. Thus, the construction activities would be in compliance with the City's construction-related noise standards.

While construction noise will vary, it is expected that composite noise levels during construction would reach 70 dBA Leq at the nearest industrial uses to the west and 68 dBA Leq at the nearest residential use to the east during daytime hours as described in Section 5.13, *Noise* of the Draft EIR. These predicted noise levels would only occur when all construction equipment is operating simultaneously, and therefore, are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the Project area under existing conditions, the noise impacts would no longer occur once Project construction is completed. As construction noise from the proposed Project at the nearby receptor locations would range from 68 to 70 dBA Leq, construction-related noise impacts would remain below the 80 dBA Leq and 90 dBA Leq 1-hour construction noise level criteria for daytime construction noise for residential and industrial uses. Therefore, impacts related to construction noise would be less than significant.

Operation: Potential noise impacts associated with the operations of the proposed Project would be from project-generated vehicular traffic on the nearby roadways and from onsite activities, which have been analyzed separately below.

Traffic Noise Impacts: Table 5.13-9 of the Draft EIR provides the traffic noise levels for the existing year (2025) and the opening year (2027) without and with the proposed Project. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn.

As shown in Table 5.13-9 of the Draft EIR the proposed Project would increase noise levels by up to 1.5 dBA CNEL, which is below the 3 dBA perceptibility threshold and would not exceed the 5 dBA threshold. Therefore, traffic noise impacts from Project-related traffic on offsite sensitive receivers would be less than significant, and no mitigation measures are required.

On-site Stationary Noise Impacts: Adjacent offsite land uses would be potentially exposed to stationary-source noise impacts from the proposed on-site HVAC equipment, trash bin emptying activities, and truck deliveries and loading and unloading activities.

The Project would include eight rooftop HVAC units on each building (16 total). The HVAC equipment is assumed to operate 24 hours per day. The HVAC equipment would generate sound power levels (Lw) of up to 87 dBA Lw or a sound pressure level of 72 dBA Leq at 5 feet based on manufacturing data.

The Project is estimated to have two trash dumpsters: one near the southeastern corner of Building 1 and one at the western side of the parking between the two buildings. The trash emptying activities would take place for a period of less than 1 minute and would generate a sound power level of up to 118.6 dBA Lw or a sound pressure level of 84 dBA Leq at 50 feet, based on reference information within SoundPLAN.

The proposed Project would include 20 percent cold storage. Noise levels generated by the cold storage fan units would generate a noise level of 57.5 dBA Leq at 60 feet, based on previously gathered reference noise level measurements.

Noise levels generated by delivery trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA Leq at 20 feet based on measurement taken for the Noise and Vibration Impact Analysis. Trucks would arrive on site and maneuver their trailers so that trailers would be parked within the loading docks. During this process, noise levels are associated with the truck engine noise, air brakes, and back-up alarms while the truck is backing into the dock. These noise levels would occur for a shorter period of time (less than 5 minutes). After a truck enters the loading dock, the doors would be closed, and the remainder of the truck loading activities would be enclosed and therefore much less perceptible. It is assumed that truck arrivals and departure activities could occur at 32 spaces (16 at each building) for a period of less than 5 minutes each.

Noise levels generated by delivery trucks being loaded and unloaded for the proposed Project are assumed to be 75 dBA Leq at 20 feet based on the noise levels taken for a similar type of project. It is assumed that unloading activities could occur at half of the total docks (20 docks) simultaneously for a period of 30 minutes in a given hour.

Draft EIR Tables 5.13-10 and 5.13-11 present the noise levels from all the on-site stationary sources at the closest sensitive uses during daytime and nighttime, respectively. As shown, noise levels at the closest sensitive use to the north of the Project site would experience noise level impacts that would not exceed existing ambient noise levels at the nearby noise-sensitive receiver and would not exceed the residential use daytime

and nighttime noise standards of 55 dBA Leq and 45 dBA Leq, respectively. Therefore, operational noise impacts would be less than significant.

Impact NOI-2 Finding: The Project would not result in generation of excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant (Draft EIR page 5.13-20 – 5.13-22).

Facts in Support of Finding:

Construction: Construction activities for development of the proposed Project would include demolition, excavation, and grading activities, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities.

The construction activities required for the Project can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the receptors, and soil type. Draft EIR Table 5.13-12 shows the PPV and VdB values at 25 feet from the construction vibration source. Bulldozers and other heavy-duty construction equipment anticipated to be used for the proposed Project would generate approximately 0.089 PPV in/sec or 87 VdB of groundborne vibration when measured at 25 feet. As shown in Draft EIR Table 5.13-13, vibration levels are expected to approach 50 VdB at the closest industrial uses to the west and 47 VdB at the nearest residential use to the east and would not exceed the annoyance thresholds of 78 VdB and 84 VdB for daytime residential uses and office type uses, respectively. As shown in Draft EIR Table 5.13-14, vibration levels are expected to approach 0.037 in/sec PPV at the nearest surrounding structures to the north and would not exceed the 0.1 PPV in/sec damage threshold considered safe for fragile buildings. Additionally, Project construction activities would be regulated by the City's Noise Ordinance (City of Riverside Municipal Code Section 7.35.020(G)), which prohibits construction activities between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. As such, vibration impacts would not occur during the more sensitive nighttime hours. Therefore, impacts related to construction vibration would be less than significant.

Operation: Operation of the proposed Project would not generate vibration levels related to on-site operations. Vibration levels generated from Project-related traffic on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Based on a reference vibration level of 0.076 in/sec PPV, structures greater than 20 feet from the roadways that contain Project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV. Therefore, operational groundborne vibration impacts would be less than significant.

Impact NOI-3 Finding: The Project is not located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, or within two miles of a public airport or public use airport and would not expose people residing or working in the project area to excessive noise levels. Impacts would be less than significant (Draft EIR page 5.13-22).

Facts in Support of Finding: The closest airports to the Project site are the Flabob Airport, located approximately 3.1 miles west of the Project site, and the Riverside Municipal Airport located approximately 5.4 miles southwest of the Project site. Based on Map FL-3, Noise Compatibility Contours, of Riverside County Airport Land Use Compatibility Plan Policy Document, the Project site is located outside of the 65 dBA CNEL noise contour of the Flabob Airport; Based on Exhibit RI-5, Future Noise Impacts, of Riverside County ALUCP – West County Airports Background data, the project is located outside the 65 dBA CNEL noise contour for Riverside Municipal Airport. Additionally, the March Air Reserve Base/Inland Port Airport is located approximately 7.8 miles southeast of the project site. The Project site is located within Zone E of the March

Air Reserve Base/Inland Port Airport's Airport Influence Area, however, the Project site is outside the 65 dBA CNEL noise contour of the airport. Therefore, the Project site would not expose people working in the Project area to excessive airport-related noise levels, and impacts would be less than significant.

Cumulative Impact Finding: The Project would result in cumulative impacts related to noise. Impacts would be less than significant (Draft EIR page 5.13-23).

Facts in Support of Finding: Cumulative noise assessment considers development of the proposed Project in combination with ambient growth and other development projects within the vicinity of the Project site. As noise and vibration are localized phenomenon and drastically reduce in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the proposed Project to result in cumulative noise impacts.

As shown in Draft EIR Figure 5-1, Cumulative Projects, the closest cumulative projects are along Durahart Street, with Projects 20 and 23 at 2610 Durahart Street consisting of outdoor storage facilities. The commencement of construction of the adjacent cumulative projects is unknown; however, it is possible that construction activities from both the proposed Project and the adjacent cumulative projects or other nearby cumulative projects would occur simultaneously and could have the potential to cumulatively contribute to a noise impact. Cumulative noise increases due to construction would be temporary and localized. In addition, development of the proposed Project and other nearby cumulative projects would be subject to the requirements of the City's Noise Ordinance. The City of Riverside Municipal Code Section 7.35.020(G)) prohibits construction activities between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday. Thus, cumulative noise and vibration impacts would not occur during the more sensitive nighttime/evening hours. Construction noise levels from the proposed Project at the nearest receptors would range from 68 to 70 dBA Leq and would remain below the 80 dBA Leq and 90 dBA Leq 1-hour construction noise level criteria for daytime construction noise for residential and industrial uses. Therefore, the Project's noise and vibration impacts during daytime, when combined with existing and future development, would not result in a cumulatively considerable impact, and cumulative noise and vibration impacts associated with construction activities would be less than significant.

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Project traffic volumes on the roadways in the Project vicinity. The increase in noise levels associated with the traffic volumes of the proposed Project were previously identified. As detailed, the proposed Project would increase noise levels by a maximum of 1.5 dBA CNEL, which would not exceed the 5 dBA threshold. Therefore, the Project would not result in a cumulatively considerable impact when combined with existing and future development. Cumulative impacts would be less than significant.

5.14 POPULATION AND HOUSING

Impact POP-1 Finding: The Project would not induce substantial unplanned population growth in an area, either directly or indirectly. Impacts would be less than significant (Draft EIR page 5.14-7).

Facts in Support of Finding: The Project proposes to develop a 10.21-acre portion of the site with two new warehouse buildings totaling 199,850 square feet (SF). The proposed Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City's population. However, the proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. Based on employment generation rates listed in Table 3.G of the *Riverside*

C*ounty General Plan EIR*, which lists an employment generation factor for light industrial uses of 1 employee per 1,030 SF, implementation of the proposed Project would create up to an additional 194 jobs.

Construction: Construction of the proposed Project would result in a temporarily increased demand approximately 117 for construction workers (from appendix B of the Draft EIR). Workers are anticipated to come from the City and surrounding jurisdictions and commute daily to the jobsite. Although it is possible that the demand for workers could induce some people to move to the region, this consideration would be minimal due to the temporary nature of construction and the relative number of existing construction workers in the region. Approximately 14,945 individuals are employed in the construction industry in the City of Riverside and 101,257 individuals are employed in the construction industry in Riverside County as a whole. Additionally, due to the City's location within Riverside County and proximity to San Bernardino County, this analysis considers construction workers in neighboring jurisdictions, with approximately 80,549 employed in San Bernardino, 9,010 in Fontana, and 4,511 in Ontario. The supply of general construction labor in the vicinity of the Project area is not expected to be constrained. As such, the existing individuals that are employed in the construction industry in Riverside County could meet the construction needs of the Project, and this labor pool would increase with the continued projected growth of the City of Riverside and the County of Riverside. Therefore, implementation of the proposed Project would not induce substantial unplanned population growth directly or indirectly through construction employment that could cause substantial adverse physical changes in the environment. Impacts would be less than significant.

Operation: Implementation of the proposed nonresidential Project would result in long-term employment opportunities in the Project region. The Project is estimated to generate approximately 194 employees. As shown in Draft EIR Table 5.14-4, employment in the City of Riverside is expected to increase by 45,900 jobs between 2019 and 2050. Full buildout of the Project would represent approximately 0.4 percent of projected employment growth within the City of Riverside. Thus, the employment growth that would occur from the proposed Project is within the growth projections used to prepare SCAG's 2024-2050 RTP/SCS. The employees that would fill these roles are anticipated to come from within the City or the region, as the number of individuals employed in manufacturing, transportation, and warehousing is 27,377 in the City of Riverside, 169,172 in Riverside County, 196,819 in the City of San Bernardino, 27,266 in Fontana, and 20,567 in Ontario. It is anticipated that new employees at the Project site would already reside within commuting distance and would not generate substantial needs for any housing. Thus, direct impacts related to population growth would be less than significant.

Infrastructure. Development of the proposed Project would require expansion of infrastructure to serve the proposed uses at the site, including installation of new onsite water, sewer, stormwater drainage lines, and improved roadways as outlined in Draft EIR Section 3.0, *Project Description*. However, the Project does not involve installation of infrastructure in unserved areas or extension of infrastructure into areas that could result in future unplanned growth. The proposed Project would include development of driveways as well as roadway improvements within the site frontage to provide adequate access and circulation for passenger automobiles and truck traffic. The Project does not directly propose any off-site roadway expansions. Thus, the infrastructure proposed by the Project would not induce unplanned population growth either directly or indirectly that could cause substantial adverse physical changes in the environment, and impacts would be less than significant.

Impact POP-2 Finding: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Impacts would be less than significant (Draft EIR page 5.14-8).

Facts in Support of Finding: The Project site is currently developed with an existing industrial facility and does not contain any housing units. The Project site has a General Plan Land Use designation of Industrial (I),

is zoned General Industrial, and is also within the Innovation District (ID) Overlay Zone, within the Employment Emphasis (EE) and Housing Emphasis (HE) subdistricts. The Project includes a zone change to change the site's ID Overlay Zone subdistrict from EE and HE to Industrial Emphasis (IE), which would allow for the proposed industrial buildings. While the Project would change the site's ID Overlay Zone subdistrict from a designation that allows housing as one of the uses to a designation that does not allow housing, the Project would not be subject to the No Net Loss Law because the site was zoned Industrial pursuant to Municipal Code Chapter 19.130 as of January 1, 2018, with zero residential development capacity. Therefore, rezoning the site to Industrial Emphasis pursuant to Municipal Code Chapter 19.170 would not violate No-Net Loss Rule. Further, the City's 2021-2029 Housing Element determined that the City has adequate capacity to accommodate the City's RHNA. Therefore, the Project would not displace any housing and would not necessitate the construction of replacement housing. Impacts would be less than significant.

Population and Housing Cumulative Finding: The Project would not result in cumulative impacts to population and housing. Impacts would be less than significant (Draft EIR page 5.14-9).

Facts in Support of Finding: The cumulative population and housing impact assessment considers the development of the proposed Project in conjunction with other development projects in the context of the City of Riverside General Plan area. Impacts from cumulative population growth are considered in the context of their consistency with local and regional planning efforts. The Project site is designated by the Riverside General Plan for industrial development, zoned Industrial, and located within the ID Overlay Zone in the EE and HE subdistricts, with a proposed zone change to IE to align the zoning with the proposed industrial buildings and the General Plan. The proposed Project would not exceed the SCAG population, housing, and employment growth projections for the City and would result in a generation of approximately 194 permanent jobs at full buildout, which is 0.4 percent of the growth projection anticipated by SCAG's 2024-2050 RTP/SCS, to occur between 2019 and 2050. The proposed Project is within the growth projections used to prepare the RTP/SCS, thus, impacts related to cumulative growth would be less than significant and not cumulatively considerable.

5.15 PUBLIC SERVICES

Impact PS-1i Finding: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Impacts would be less than significant (Draft EIR page 5.15-11).

Facts in Support of Finding: The first response station for the Project site is Station 4, located approximately 1.4 roadway miles southeast of the Project site, at 3501 Cranford Avenue, Riverside, CA 92507. Construction and operation of the proposed Project would result in an increased number of employees in the Project area; however, the Project is an infill project on a site which is already developed with an existing industrial use which is already served by nearby RFD stations. In addition, proposed access to the Project site would be reviewed by the City and RFD for compliance with fire protection standards, and the Project would adhere to the California Fire Code, with buildings equipped with fire extinguishers, sprinklers, alarms, pumps, and backflow devices pursuant to the California Fire Code and California Building Code. Since the site is already served by the fire department, and there are two additional existing fire stations within two miles of the Project site, the Project would not result in the need for new or physically altered fire department facilities that could cause significant environmental impacts. Therefore, the Project would result in less than significant impacts related to fire protection services.

Impact PS-1ii Finding: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police service facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios and response times or other performance objectives for police services. Impacts would be less than significant (Draft EIR page 5.15-11).

Facts in Support of Finding: The Riverside Police Department (RPD) provides policing services for the City of Riverside. RPD maintains three police stations throughout the City, the closest located at 4102 Orange Street, Riverside, CA 92501, approximately 1.9 miles southwest of the Project site. Historically, each RPD station served the entire City; however, the City now uses a decentralized Neighborhood Policing Center model to provide more equitable and responsive services. The Project is not anticipated to directly or indirectly induce unplanned population growth in the City. Although the Project could potentially result in an incremental increase in the need for police protection services in an area already served by the RPD, this increase is expected to be nominal (as opposed to new residential or commercial/retail land uses, which do result in greater increase in calls for service) and would not result in the need for new police protection facilities. Therefore, impacts would be less than significant.

Impact PS-1iii Finding: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts would be less than significant (Draft EIR page 5.15-12).

Facts in Support of Finding: The proposed Project would develop two warehouses that would not directly generate students. The Project is not anticipated to generate a new population, as the employees needed to operate the Project are anticipated to come from within the Project region and substantial in-migration of employees that could generate new students is not anticipated to occur. Thus, the Project would not generate the need for new or physically altered school facilities and impacts would be less than significant.

Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a State school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project to mitigate its impacts on school facilities in excess of fees set forth in the Government Code. The Project would be required to pay school impact fees to Riverside Unified School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50), at the time of building permit issuance (included as PPP PS-1). Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services. Therefore, impacts would be less than significant.

Impact PS-1iv Finding: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts would be less than significant (Draft EIR page 5.15-13).

Facts in Support of Finding: The proposed Project would develop two warehouses and would not directly provide new housing opportunities. In addition, the proposed Project is not anticipated to result in an influx of new residents, as the employees needed to operate the proposed buildings are anticipated to come from within the City and surrounding jurisdictions. Thus, the proposed Project would not generate a substantial population that would require construction or expansion of park facilities, and impacts would be less than significant.

Impact PS-1v Finding: The Project would not result in substantial adverse physical impacts associated with other public facilities. Impacts would be less than significant (Draft EIR page 5.15-13).

Facts in Support of Finding: The proposed Project involves construction and operation of two industrial warehouse buildings and would not directly result in a direct increase in the City's population as no residential uses are proposed. The proposed Project is not likely to create a significant increase in the use of public facilities such as health care facilities, libraries, or other public facilities, nor directly result in the need to modify existing or construct new public service facilities. Therefore, impacts would be less than significant.

Public Services Cumulative Finding: The Project would not result in cumulative impacts to public services (Draft EIR page 5.15-14).

Facts in Support of Finding: The cumulative setting for public services is areas that are served by the Riverside Fire Department, Riverside Police Department, and Riverside Unified School District. The proposed Project is consistent with the General Plan land use designation of Industrial (I); thus, buildout of the Project site has been accounted for and would not result in unanticipated growth within the City. The Project would not significantly increase the need for public services in the Project area or in the City of Riverside. The Project would not impact acceptable service ratios, staffing levels, adequate equipment, response times, and other performance objectives or result in the need for new or the expansion of existing government services and facilities. Related projects in the region would be required to demonstrate their level of impact on public services and also pay their proportionate development fees, as appliable. Therefore, the incremental impact of the proposed Project would not combine with other projects in the area to result in a cumulative impact related to the provision of public services. There would be no significant cumulative environmental impact on public services from Project implementation.

Plans, Programs, and Policies

PPP PS-1: The Project is required to pay school impact fees in accordance with SB 50 at the time of building permit issuance. The school impact fee for commercial/industrial developments within the RUSD boundary is $0.84 per SF, which would equal approximately $167,874 for the Project.

5.16 RECREATION

Impact REC-1 Finding: The Project would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant (Draft EIR page 5.16-5).

Facts in Support of Finding: The proposed Project would construct and operate two warehouse buildings on a site that is currently developed with industrial uses. Implementation of the proposed Project would not directly increase housing or population as the proposed Project would not develop any residential facilities, which typically causes an increase in the demand for, and use of, existing neighborhood parks and other citywide recreational facilities. In addition, there are 500.53 acres of park and recreation facilities within two miles of the Project site available for use, and an abundance of existing regional recreational facilities, such as the Santa Ana River Wildlife Area, Lake Perris State Recreational Area, and Box Springs Mountain Reserve, that would also be available for use. Although the proposed Project would generate new employees, they are anticipated to come from the existing labor force in the region, and thus there would be no increase in residents that would cause an increase in demand for existing parks or other recreational facilities. Due to the limited increase of Project employees that would occur from implementation of the proposed Project and the amount of available park space within the vicinity of the Project site, future employees are not anticipated to increase the use of existing parks and recreation facilities to the degree

that substantial physical deterioration of such parks and facilities would occur. Therefore, impacts would be less than significant.

Impact REC-2 Finding: The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Impacts would be less than significant (Draft EIR page 5.16-5).

Facts in Support of Finding: The Project would construct and operate two warehouse buildings on a site that is currently developed with industrial uses, and would not construct any residential facilities, nor create an additional need for housing. The Project would not directly increase the City's residential population or generate additional need for parkland, does not include or require construction or expansion of recreational facilities that could negatively impact the environment, and proposes no off-site parks or recreational improvements. In addition, the Project applicant would be required to pay local park development fees to contribute to the construction or expansion of recreational facilities (including local, aquatic, regional/reserve and trail facilities) pursuant to Riverside Municipal Code Chapters 16.44, 16.60, and 16.76 (included as PPP R-1). Therefore, the proposed Project would result in less than significant impacts related to the construction or expansion of recreational facilities or services.

Recreation Cumulative Finding: The Project would not result in cumulative impacts to recreation (Draft EIR page 5.16-6).

Facts in Support of Finding: Based on the foregoing discussion under Impacts REC-1 and REC-2, the Project would not increase the use of existing recreational facilities within the vicinity such that physical deterioration would occur and the Project would not include or require the construction or expansion of recreational facilities. Additionally, cumulative projects subject to Municipal Code Chapters 16.44, 16.60, and 16.76 would be required to provide park and recreational facilities and/or pay in-lieu fees as required by the Riverside Municipal Code and as described in the General Plan. Therefore, the proposed Project would not result in a cumulatively considerable impact related to parks and recreational facilities.

Plans, Programs, and Policies

PPP R-1: Park and Recreation Development Fees. Pursuant to Municipal Code Chapters 16.44, 16.60, and 16.76, park development fees are imposed on the construction or placement of applicable nonresidential construction in accordance with the schedule of fees adopted by the City Council.

5.17 TRANSPORTATION

Impact TRA-1 Finding: The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant (Draft EIR page 5.17-7 – 5.17-10).

Facts in Support of Finding:

Transit: The Riverside Transit Authority (RTA) provides bus services in the city and western Riverside County. Bus Route 10 is located along 3rd Street, approximately 0.25 miles south of the Project site with one stop located near the intersection of 3rd Street and Chicago Avenue. Bus Route 13 is located along Chicago Avenue approximately 0.35 miles east of the Project site, with one stop located near the intersection of Chicago Avenue and Spruce Street. The existing bus services would allow convenient access for employees of the Project site and may reduce VMT. The proposed Project would not alter or conflict with existing bus stops and schedules, and impacts related to RTA transit services would not occur.

Bicycle Facilities: There are no existing or planned bicycle lanes adjacent to the Project site. The existing and planned pedestrian facilities closest to the Project site are as follows:

- South of the Project site, starting on Linden Street (approximately 0.5 miles south of the Project site), Kansas Avenue is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways. However, there are no existing bike facilities along the roadway.
- Spruce Street, located approximately 0.10 miles north of the Project site, is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways, and there are existing bike facilities along Spruce Street.
- Chicago Avenue, located approximately 0.35 miles east of the Project site, is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways. There are existing bike facilities along a portion of the roadway.
- 3rd Street, located approximately 0.25 miles south of the Project site, is identified as a Class 2 city bikeway in the City's Master Plan of Trails and Bikeways. There are existing bike facilities along the roadway.

The proposed Project would not conflict with existing or planned bicycle facilities as there are no existing or planned bicycle facilities adjacent to the Project site, and impacts related to bicycle facilities would not occur.

Pedestrian Facilities: There is an existing 8-foot-wide sidewalk along the southern Project frontage on Massachusetts Avenue, but no sidewalks exist along the western frontage on Kansas Avenue or the northern frontage on Roberta Street. The proposed Project would include the construction of 6-foot wide sidewalks at a minimum along the Project frontages on Kansas Avenue, Roberta Street, and Massachusetts Avenue. The proposed street improvements would be developed in accordance with the City of Riverside General Plan and the Riverside Municipal Code standards and guidelines. As a result, the Project would provide new pedestrian facilities and expand pedestrian circulation. Thus impacts related to pedestrian facilities would not occur.

City of Riverside General Plan: The proposed Project is consistent with the site's General Plan land use designation Industrial (I). The City of Riverside General Plan states that the primary intent of the Industrial land use designation is to allow for manufacturing and wholesaling; support commercial uses; and warehouse and distribution facilities only at specific locations. Once approved by the Development Agreement, the Project site would be within one of these specific locations. The Project proposes to construct two new industrial buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue) that would support warehouse and office uses. A warehouse is used for the storage, receiving, shipping or wholesaling of goods and merchandise, and any incidental or accessory activities. The proposed light industrial warehouses are consistent with the intended uses of the Industrial land use designation. In addition, the Project would be consistent with the following applicable City of Riverside 2025 General Plan Circulation and Community Mobility Element Policies: CCM-2.2, CCM-2.3, CCM-2.4, CCM-2.7, CCM-5.2, CCM-6.2, CCM-9.10, CCM-10.12, CCM-12.1, CCM-12.2, CCM-13.1, CCM-13.3. As such, the proposed Project would not conflict with the City of Riverside General Plan, and no impact would occur.

Roadway Facilities

C*onstruction:* Construction of the proposed Project is anticipated to occur over an 14-month period. Construction-related trips generated on a daily basis throughout various construction activities would be derived from construction workers and delivery of materials. It is anticipated that Project construction would generate haul trips that would be distributed throughout the day. During construction, there would also be passenger car construction trips associated with crew arrivals and departures. The weekday AM peak period

is 7:00 AM to 9:00 AM, and the weekday PM peak period is 4:00 PM to 6:00 PM. It is anticipated the majority of construction crews would arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day.

As shown in Draft EIR Table 5.17-1, the demolition construction phase would generate the most vehicular trips per day from approximately 15 workers and 311 hauling trips, which would result in a total of 326 daily trips during the demolition construction phase that would last approximately 15 working days.

All construction equipment, including construction worker vehicles, would be staged on the Project site for the duration of the construction period. In addition, as part of the grading and building plan review processes, the City construction permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures (as applicable). Therefore, construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant.

Operation: Regional access to the Project site is provided by I-215, SR-60, and SR-91; local access to the Project site is provided via Kansas Avenue, Massachusetts Avenue, and Roberta Street. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project vicinity. Access to the Project site would be provided from five proposed driveways. The northwestern driveway on Roberta Street would be limited to passenger vehicles while the northeastern driveway would provide both passenger vehicle and truck access. The northernmost driveway on Kansas Avenue would provide access to both passenger vehicles and trucks. The southernmost driveway on Kansas Avenue would be limited to passenger vehicles. The driveway on Massachusetts Avenue would provide both passenger vehicle and truck access.

Draft EIR Table 5.17-4identifies the number of trips that would be generated by the Project. The Project would generate a total of 974 daily trips, inclusive of148 AM (130 inbound and 18 outbound), and 132 PM (20 inbound and 112 outbound) peak hour trips. When converted to passenger vehicle trips, the existing site is estimated to generate approximately 462 daily trips, and the proposed Project is anticipated to generate approximately 632 daily trips.

SB 743 does not prevent a city or county from continuing to analyze delay or LOS, but these metrics may no longer serve as the basis for CEQA impacts; however, PRC Section 21099(b)(4) allows application of local planning requirements, and the City requires projects to identify potential impacts to LOS standards in its general plan and implement LOS improvements for congestion relief as needed.

Of 12 study area intersections evaluated during AM and PM peak hours, one intersection (Chicago Ave/Massachusetts Ave) currently operates at deficient LOS (LOS F), while two intersections (Chicago Avenue/Massachusetts Avenue and Chicago Avenue/3rd Street) are forecasted to operate at deficient LOS (LOS F) under Background Without Project Conditions and under Background With Project Conditions during the AM and PM peak commute periods.

The Project would cause two intersections, Chicago Avenue/Massachusetts Avenue and Chicago Avenue/3rd Street, to deteriorate. Therefore, the Project would be required to provide improvements on these intersections to offset the increase in delay under the Background with Project condition. Project Design Feature (PDF) TRA-1 requires converting the Chicago Avenue/Massachusetts Avenue intersection to all-way stop control, and PDF TRA-2 requires implementing protected-permissive left-turn phasing with flashing yellow signals and signage; with implementation of these PDFs, the Project would not exceed the City's LOS screening criteria. Therefore, operational impacts related to conflict with an applicable plan, ordinance, or

policy establishing measures of effectiveness for the performance of the circulation system would be less than significant.

Impact TRA-2 Finding: The Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (B) regarding vehicle miles traveled. Impacts would be less than significant (Draft EIR page 5.17-11).

Facts in Support of Finding: The City's VMT screening thresholds were applied to the proposed Project to determine if a VMT analysis is required. The Project needs to meet at least one of the screening thresholds to waiver further VMT analysis. The screening thresholds and their applicability to the Project site are as follows:

- **Transit Priority Area Screening:** The Project is not located in a Transit Priority Area, therefore this screening criteria does not apply.
- **Low VMT Area Screening:** As shown in Figure 5.17-1, *Low VMT Generating Area Output from WRCOG VMT Screening Tool*, the proposed Project is located in in a low VMT-generating area (TAZ 2101) and would not exceed the City's VMT baseline (baseline is 2025 for this Project). Furthermore, the proposed Project is consistent with the applicable General Plan land use designation. Therefore, the proposed Project meets Screening Criteria 2.
- **Project Type Screening:** The proposed Project does not propose a local serving land use and would generate more than 110 daily net new vehicle trips. Therefore, the proposed Project would not satisfy the requirements of Screening Criteria 3.
- **Mixed-Use Projects:** The proposed Project does not include a mix of uses. Therefore, the proposed Project would not satisfy the requirements of Screening Criteria 4.
- **Redevelopment Projects:** The proposed Project results in a net increase in daily trips and would have a comparable trip type (industrial VMT/employee). Therefore, the proposed Project does not satisfy the requirements of Screening Criteria 5.

The proposed Project meets the Low VMT Area screening criteria. Therefore, per the City's VMT screening criteria, the proposed Project would have less than significant impact on VMT and no further VMT analysis is required.

Impact TRA-3 Finding: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant (Draft EIR page 5.17-15).

Facts in Support of Finding:

Construction: The Project proposes redevelopment of the site with construction lasting approximately 14 months. During construction, worker vehicles, haul trucks, and vendor trucks would be staged on the portion of the Project site under construction for the duration of the construction period. As part of the grading plan and building plan review processes, City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures and measures to properly route heavy-duty construction vehicles entering and leaving the site (as applicable). As a result, impacts related to vehicular circulation design features and incompatible uses during construction of the proposed Project would be less than significant.

Operation: Access to the Project site would be provided via five proposed driveways, including two on Roberta Street, two on Kansas Avenue, and one on Massachusetts Avenue. The proposed northeastern driveway on Roberta Street would be a cul-de-sac driveway. The Project would include construction of a

minimum of six-feet wide sidewalks along the Project frontages on Kansas Avenue, Roberta Street, and Massachusetts Avenue.

Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project site. Trucks traveling to the Project site would be expected to travel via SR-91 to spruce Street and I-215 to 3rd Street. Trucks are expected to primarily utilize Kansas Avenue, Massachusetts Avenue, and 3rd Street to access the site.

On-site traffic signing and stripping would also be implemented in conjunction with detailed construction plans with implementation of the Project. Additionally, sight distance at the Project's access points would be reviewed with respect to City standards at the time of final grading, landscape, and street improvement plan reviews. Project frontage improvements and site access points would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with the City of Riverside General Plan Circulation and Community Mobility Element. Compliance with existing regulations would be ensured through the City's construction permitting process. As a result, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses and would be less than significant.

Impact TRA-4 Finding: The Project would not result in inadequate emergency access. Impacts would be less than significant (Draft EIR page 5.17-15).

Facts in Support of Finding:

Construction: Construction activities would occur within and adjacent to the Project site and would not restrict access of emergency vehicles to the site or adjacent areas. Construction activities would be required to implement measures to facilitate the passage of persons and vehicles through/around any required temporary road restrictions and ensure the safety of passage in accordance with Section 503 of the California Fire Code, which would be ensured through the City's permitting process. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access impacts to a less than significant level.

Operation: The proposed Project would not result in inadequate emergency access. Direct access to the proposed Project would be provided from Massachusetts Avenue, Kansas Avenue, and Roberta Street, which are adjacent to the Project site. The proposed Project is required to design and construct internal access roads of sufficient size to accommodate emergency vehicles and provide fire suppression facilities (e.g., hydrants, fire sprinklers and fire-resistant construction materials) in conformance with the City Municipal Code and Section 503 of the California Fire Code. Compliance with appropriate code specifications would be verified by the City's Building and Safety Department during the construction and occupancy permitting process. Thus, potential impacts related to inadequate emergency access during Project operation would be less than significant.

Transportation Cumulative Finding: The Project would not result in cumulative impacts related to transportation (Draft EIR at p. 5.14-16).

Facts in Support of Finding: The proposed Project would not result in significant impacts related to alternative transportation (such as public transit, pedestrian, and bicycle transportation) or policies addressing the circulation system. Cumulative development in the City would be subject to site-specific reviews, including reviews of sidewalk, bike lane, and bus stop designs that would reduce the potential for cumulatively considerable impacts. As the Project would result in a less-than-significant impact and cumulative projects require compliance with existing circulation regulations, potential impacts from the Project would not

cumulatively combine with other projects to result in cumulatively considerable impacts. Thus, cumulative impacts related to conflicts with circulation plans and programs would be less than significant.

The cumulative traffic study area for the proposed Project includes the TAZ where the Project is located, TAZ 2101. The proposed Project site is located within a Low VMT area and meets Screening Criteria 2, and therefore has a less than significant VMT impact. In addition, the proposed Project is consistent with the existing General Plan and thus would be consistent with the anticipated cumulative roadway traffic volumes; therefore, cumulative VMT transportation impacts would be less than significant.

The Project would not result in significant impacts related to incompatible uses or hazards due to roadway design. The proposed circulation layout would be required to be installed in conformance with City design standards to ensure that no potentially hazardous design features or inadequate emergency access would be introduced by the Project that could combine with potential hazards from other projects within the Project vicinity. In addition, cumulative development in the City would be subject to site-specific reviews, including reviews by police and fire protection authorities, and the City of Riverside's own traffic safety engineers, that would reduce the potential of cumulatively considerable design hazards. Therefore, potential impacts related to circulation design features would not occur from the Project nor combine with hazards from other projects, and cumulative impacts would be less than significant.

The proposed Project would not result in significant impacts related to inadequate emergency access, as it provides direct access via Massachusetts Avenue, Kansas Avenue, and Roberta Street and would be designed in accordance with the City Municipal Code and California Fire Code standards which would be verified during the construction and occupancy permitting process. Cumulative development in the City would be subject to site-specific reviews; therefore, potential impacts related to inadequate emergency access would not occur from the Project nor combine with hazards from other projects, and cumulative impacts would be less than significant.

Project Design Features

PDF TRA-1: Chicago Avenue/Massachusetts Avenue Intersection Improvements: The Project would change the intersection control on Chicago Avenue/Massachusetts Avenue intersection to all-way stop (AWSC) control.

PDF TRA-2: Chicago Avenue/3rd Street Intersection Improvements: The Project would implement protected-permissive left-turn phasing for the northbound and southbound left-turn approaches by installing flashing yellow signal head and "Left Turn Yield On Flashing" sign on Chicago Avenue/3rd Street intersection.

5.18 TRIBAL CULTURAL RESOURCES

Impact TRC-1 Finding: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). No impact would occur (Draft EIR page 5.18-9).

Facts in Support of Finding: As detailed in Draft EIR Section 5.5, *Cultural Resources*, the Project site does not meet any of the historic resource criteria and does not meet the definition of a historical resource pursuant to CEQA. Therefore, the proposed Project would not result in impacts to historical resources that are listed

or eligible for listing. As such, the proposed Project would result in no impacts related to historical resources that are listed or eligible for listing and have cultural value to a California Native American tribe. No impact would occur.

5.19 UTILITIES AND SERVICE SYSTEMS

Impact UT-1 Finding: The Project would not require or result in the relocation or construction of new or expanded water facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant (Draft EIR page 5.19-7).

Facts in Support of Finding: The Project would connect to the existing 10-inch domestic water line within Massachusetts Avenue that currently provides water supplies to the Project site and surrounding adjacent areas. In addition, the Project would construct new on-site water service lines that would connect to the 10-inch water line within Massachusetts Avenue. No additional offsite water infrastructure would be constructed to serve the proposed Project. The new and existing on-site water system would convey water supplies to the proposed industrial warehouses and landscaping through plumbing/landscaping fixtures that are compliant with the CALGreen Code for efficient use of water.

The construction activities related to the new on-site water infrastructure that would be needed to serve the proposed warehouses are included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout the Draft EIR. Therefore, the proposed Project would not require or result in the relocation or construction of new water facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Impact UT-2 Finding: The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years. Impacts would be less than significant (Draft EIR page 5.19-7 – 5.19-8).

Facts in Support of Finding: Based on the General Plan land use, the Riverside Public Utilities (RPU) 2020 Urban Water Management Plan (UWMP) assumed that the parcels comprising the Project site would be developed with industrial uses. The UWMP used 2020 Census data, SCAG population growth projections, and updates to the City's General Plan in order to calculate future water demands within RPU's service area. The UWMP assessed the projected water demand and supply in the service area and concluded that RPU has an adequate water supply to meet demands under all climatic conditions (normal, single-dry, and multiple-dry years) within its service area through 2045. The 2020 RPU UWMP anticipates that RPU's water supply will increase from 114,923 AF in 2025 to 129,693 AF in 2045 (increase of 14,770 AF) to meet the RPU's anticipated growth in water demands.

Based on the above, it is anticipated that existing and future water entitlements from groundwater, surface water, and purchased or imported water sources, plus recycling and conservation, would be sufficient to meet the Project's demand at buildout, in addition to forecast demand for RPU's entire service area. Thus, impacts related to the availability of sufficient water supplies to serve the proposed Project and reasonably foreseeable development during normal, dry, and multiple dry years would be less than significant.

Impact UT-3 Finding: The Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant (Draft EIR page 5.19-10 – 5.19-11).

Facts in Support of Finding: The Project would install on-site sewer infrastructure that would connect to the existing 8-inch wastewater line within Massachusetts Avenue and Roberta Street that currently provide sewer collection to the Project site and surrounding adjacent areas. No additional offsite water infrastructure would be constructed to serve the proposed Project. The installation of the proposed on-site sewer infrastructure is part of construction of the proposed Project and would not result in any physical environmental effects beyond those described throughout the Draft EIR. Therefore, the proposed Project would not require or result in the relocation or construction of new wastewater treatment facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Impact UT-4 Finding: The Project would not result in a determination by the wastewater treatment provider that would serve the Project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant (Draft EIR page 5.19-11).

Facts in Support of Finding: Wastewater treatment is provided to the Project site by the Regional Water Quality Control Plant (RWQCP). Based on the City's average wastewater flow of 96.6 gallons per capita per day, the proposed Project would result in 18,740 gallons per day or 0.01874 MGD of wastewater. Under existing conditions, the RWQCP has a rated capacity of approximately 46 MGD and a daily average flow of 26 MGD, leaving approximately 20 MGD of wastewater treatment capacity. Implementation of the Project would utilize a nominal percentage of the daily treatment capacity.

In addition to treatment plant capacity, the local sewer mains serving the Project site are part of an established wastewater treatment network, and no known constraints or deficiencies have been identified in the local system that would impede service to the Project. The proposed Project would connect to the existing 8-inch sewer lines in Massachusetts Avenue and Roberta Street and based on the existing fixture count and typical flow rates, the increase in wastewater generation would not exceed the capacity of the existing sewer lines at the point of connection and downstream. Thus, the wastewater treatment provider has ample capacity, and the proposed Project would not create the need for new or expanded facilities, resulting in less than significant impacts related to wastewater treatment capacity.

Impact UT-5 Finding: The Project would not require or result in the relocation or construction of new or expanded drainage facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant (Draft EIR page 5.19-13 – 5.19-14).

Facts in Support of Finding: The Project would install grate inlets and catch basins to convey storm water to an on-site underground storm drain system that would discharge to two proposed on-site underground detention/infiltration systems. System A, located under the passenger drive aisle in the northwest portion of the site, would direct overflow to Roberta Street and System B, located beneath the truck court of Building 1, would direct overflow to Kansas Avenue. Under the current site condition, the existing 100-year, 3-hour flow is 4.56 cubic square feet (cfs) on Roberta Street and 12.41 cfs on Kansas Avenue, and with completion of the proposed Project, the 100-year, 3-hour flow would be 2.78 cfs on Roberta Street and 7.67 cfs on Kansas Avenue, lower than the existing on-site flows. Therefore, the proposed stormwater system would provide improved infiltration compared to existing conditions.

Impacts from the Project's proposed onsite stormwater drainage infrastructure are considered part of Project construction and would not cause any physical environmental effects beyond those identified elsewhere in the Draft EIR. As such, there are no environmental impacts that would occur specifically related to the Project's proposed stormwater drainage infrastructure. Therefore, Project impacts due to stormwater drainage infrastructure would be less than significant.

Impact UT-6 Finding: The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant (Draft EIR page 5.19-17).

Facts in Support of Finding:

Construction: The proposed Project involves demolition of two existing buildings and hardscape. The Project would also generate solid waste from construction packaging and discarded materials. CalEEMod version 2022.1.1 estimated that demolition as part of Project construction would result in approximately 24,902 tons of solid waste. Utilizing a construction waste factor of 3.89 pounds per square foot, construction of the proposed Project would generate approximately 389 tons of waste. The 2022 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, demolition would generate approximately 8,716 tons of solid waste to be disposed of at the landfills, and construction activities would generate approximately 136 tons of solid waste to be disposed of at the landfills. The landfills serving the Project area have a combined average daily capacity of 10,267 tons. Therefore, construction waste generated by the proposed Project would be accommodated by the landfills and would not result in excess waste. Construction impacts related to solid waste would be less than significant.

Operation: Operation of the Project would increase the volume of solid waste generated within the landfills service area. Using the default CalEEMod operational solid waste generation factor of 0.94 tons per 1,000 SF per year for warehouses, the proposed Project's approximately 199,850 SF of warehousing would generate approximately 188 tons of solid waste per year. Pursuant to the California Integrated Waste Management Act, at least 75 percent of solid waste is required to be recycled, which would reduce the volume of landfilled solid waste to approximately 47 tons per year, or approximately 0.13 tons (or 257.6 pounds) per day. The landfills serving the Project area have a combined average daily capacity of 10,267 tons. Therefore, operational waste generated by the proposed Project would be accommodated by the landfills and the proposed Project would not result in excess solid waste. Operational impacts related to solid waste would be less than significant.

Impact UT-7 Finding: The Project would comply with federal, State, and local statutes and regulations related to solid waste. No impact would occur (Draft EIR page 5.19-18).

Facts in Support of Finding: The proposed Project would result in new development that would generate solid waste. All solid waste-generating activities within the City are subject to the requirements set forth in 2022 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all State regulations, as ensured through the City's development project permitting process. Therefore, the proposed Project would comply with all solid waste statutes and regulations; and impacts would not occur.

Impact UT-8 Finding: The Project would not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant (Draft EIR page 5.19-21 – 5.19-22).

Facts in Support of Finding: Implementation of the proposed Project would generate demand for electricity, communication systems. Electricity would be provided to the Project by RPU. Adequate commercial electricity supplies are presently available to meet the incremental increase in demand attributed to the Project. Provision of electricity to the Project site is not anticipated to require or result in the construction of new

facilities or the expansion of existing facilities, the construction or relocation of which would cause significant environmental impacts to electricity. As such, impacts would be less than significant.

The Project would connect to the existing natural gas lines in Kansas Avenue and Massachusetts Avenue and natural gas would be provided by Southern California Gas. As such, the proposed Project is not anticipated to require or result in the construction of new gas facilities or the expansion of existing facilities. Impacts would be less than significant.

Communication systems for the Project would be provided by existing providers such as AT&T. AT&T is a private company that provides connection to the communication system on an as-needed basis. As such, the proposed Project is not anticipated to require or result in the construction of new communications facilities or the expansion of existing facilities. Impacts would be less than significant.

The Project Applicant would be responsible for coordinating with each utility company to ensure utility improvements occur according to standard construction and operation procedures administered by the California Public Utilities Commission. Each of the dry utility systems is available along Kansas Avenue and Massachusetts Avenue, and excavation would be required to underground these lines and interconnect to the Project site, which would be done as part of roadway, driveway, and sidewalk improvements that are included in the proposed Project. The analysis presented in the Draft EIR has evaluated all potential environmental impacts associated with installation of utility infrastructure and connection to existing infrastructure. Therefore, potential impacts associated with utilities, including electricity, natural gas and communication systems would be less than significant.

Cumulative Impact Finding: The Project would not result in cumulative impacts related to utility and service systems (Draft EIR pages 5.19-8, 5.19-11, 5.19-14, 5.19-18, 5.19-22).

Facts in Support of Finding:

Water: The geographic scope of cumulative analysis for water service is the service area of RPU. Cumulative water supply impacts are associated with the adequacy of the water purveyor's primary sources of water that include groundwater, purchased or imported water, and recycled water. Water supplies have been planned through RPU's 2020 UWMP, which identifies the ability to meet a majority of future water demands through groundwater and imported supplies, despite the current deficiency in recycled water. RPU's UWMP provides projections for water supply and demand through 2045, and shows that in normal, dry, and multiple dry year conditions with anticipated growth in RPU's service area, RPU would be able to meet water demand. Therefore, the incremental impacts associated with the proposed Project would not combine with other cumulative projects in the area to create a cumulatively considerable impact on RPU's water supplies. As a result, cumulative impacts would be less than significant.

Wastewater: Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure. The cumulative system evaluated includes the sewer system and the conveyance system through wastewater disposal at the RWQCP.

With the proposed Project, the sewer system would have sufficient capacity to handle the increased flows resulting from implementation of the proposed Project. The continued regular assessment, maintenance, and upgrades of the sewer system by RPU would reduce the potential of cumulative development projects to result in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required. Thus, increases in wastewater in the sewer system would result in a less than significant cumulative impact.

Stormwater: The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. The proposed Project would not cause a substantial change in the amount of stormwater runoff from the Project site. As a result, the proposed Project would not generate additional runoff that could combine with runoff from cumulative projects that could cumulatively combine to impact drainage.

The existing State, and regional regulations require development projects to maintain pre-project hydrology, thus no net increase of offsite stormwater flows would occur. RWQCB permit conditions require a hydrology/drainage study to demonstrate that all runoff would be appropriately conveyed and not leave the Project site at rates exceeding pre-project conditions, prior to receipt of necessary permits. As a result, increases of runoff from cumulative projects that could cumulatively combine to impact stormwater drainage capacity would not occur, and cumulative impacts related to drainage infrastructure would be less than significant.

Solid Waste: Cumulative projects in the area would increase solid waste generation and decrease the available capacity of the nearby landfills. However, as with the proposed Project, cumulative projects have been or would be required to conduct an environmental review and would be required to adhere to solid waste regulations, which are aimed at reducing overall solid waste levels. Furthermore, the Badlands Landfill, the Lamb Canyon Landfill, and the El Sobrante Landfill are forecasted to have sufficient capacity to serve current and future needs until their scheduled closures in January 2059, April 2032, and January 2051, respectively. Therefore, the increase in solid waste from future buildout of the proposed Project would be less than cumulatively considerable and would be less than significant.

Electric Power, Natural Gas, and Telecommunications: Cumulative dry utilities assessment considers development of the Project in combination with the other development projects within the vicinity of the Project area. Cumulative impacts related to the provision of facilities for electricity, natural gas and communications systems, have been evaluated throughout the Draft EIR and were determined to be less than significant. In addition, the Project would connect to existing infrastructure and there are adequate dry utilities available for use by the Project in the Project area. Therefore, the proposed Project's incremental impacts would not combine with other cumulative projects, and cumulative impacts associated with the provision of utility facilities would be less than significant.

Plans, Programs, and Policies

PPP HYD-1: NPDES/SWPPP. As listed in Section 5.10, *Hydrology and Water Quality*.

PPP HYD-2: WQMP. As listed in Section 5.10, *Hydrology and Water Quality*.

5.20 WILDFIRE

Impact WF-1 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant (Draft EIR page 5.20-9).

Facts in Support of Finding: According to the CalFire Hazard Severity Zone Map, the Project is not within a State Responsibility Area or area classified as a very high FHSZ.

The proposed Project would be permitted and approved in compliance with existing safety regulations, such as the California Building Code and CFC to ensure that it would not conflict with implementation of the Multi-Jurisdictional LHMP or the City of Riverside Municipal Code.

Construction: The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. During construction, roadways would remain open to ensure adequate emergency access to the Project area and vicinity and temporary vehicle traffic restrictions would be required to implement adequate measures to facilitate the safe passage of persons and vehicles. Per CFC Section 503, right-of-way encroachment must be safeguarded through the installation of safety devices to ensure that construction activities would not physically interfere with emergency access or evacuation. Compliance with CFC Section 503 would be verified by the City's Building and Safety Division during the construction permitting process and the issuance of grading and building permits. Therefore, the Project would not block any evacuation routes or conflict with an emergency response plan, and impacts related to interference with an adopted emergency response of evacuation plan during construction activities would be less than significant.

Operations: The Project would include vehicular access to the Project site from Roberta Street, Kansas Avenue, and Massachusetts Avenue. Building 1 would be accessed by three driveways: the 26-foot-wide northwestern driveway and the 37.5-foot-wide northeastern driveway on Roberta Street and the shared 50-foot-wide shared driveway on Kansas Avenue. Building 2 would also be accessed via three driveways: the 50-foot-wide northernmost shared driveway and the 26-foot-wide southernmost driveway on Kansas Avenue, and the 35-foot-wide driveway on Massachusetts Avenue. Internal access for both buildings would be provided via 26-foot-wide to 35-foot-wide drive aisles which would double as fire lanes. Therefore, the Project would provide adequate and safe circulation and a variety of routes for emergency responders to access the site. The development would comply with Municipal Code standards for emergency access and roadway improvements. Therefore, operation of the Project would not impair implementation or interfere with adopted emergency response or evacuation plans and impacts would be less than significant.

Impact WF-2 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones, and would not expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors, that could exacerbate wildfire risks. Impacts would be less than significant (Draft EIR page 5.20-10).

Facts in Support of Finding: The Project is not located within a State Responsibility Area, Local Responsibility Area, or an area designated as a Very High FHSZ. The Project site and surrounding area are relatively flat, with no significant slopes that could promote or intensify wildfire spread, and do not contain other major factors that could exacerbate wildfire risks. Implementation of the proposed Project would be required to adhere to the California Fire Code and would be verified by the City prior to issuance of building permits for the Project to ensure that the Project plans meet the fire protection requirements. In addition, the predominant use of non-flammable materials, such as concrete, in the Project's structural design further minimizes fire risk. Overall, the Project would not exacerbate wildfire risks and thereby would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire and impacts would be less than significant.

Impact WF-3 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be less than significant. Impacts would be less than significant (Draft EIR page 5.20-11).

Facts in Support of Finding: The Project site is not located within a State Responsibility Area or area classified as a very high FHSZ. Although the Project includes two concrete tilt-up warehouses and a paved parking lot, connection to existing power lines on Kansas Avenue and Massachusetts Avenue, and construction of a cul-de-sac driveway on Roberta Street, the Project does not include installation or maintenance of infrastructure related to fuel breaks, emergency water sources, or power lines that could exacerbate wildfire risk. The Project would be required to comply with the CFC, which sets fire reduction requirements, and compliance would be verified by the City prior to issuance of building permits. Overall, the Project would not exacerbate wildfire risks, and impacts would be less than significant.

Impact WF-4 Finding: The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant (Draft EIR page 5.20-11).

Facts in Support of Finding: The Project is not located within a State Responsibility Area or area classified as a very high FHSZ. The Project site is located in a flat area that does not contain or is adjacent to significant slopes, and the Project would not generate large slopes. In addition, the Project's hydrologic features have been designed to slow, filter, and infiltrate stormwater to reduce post-fire runoff and minimize the potential for flooding downstream. Therefore, the Project would not expose people or structures to significant risks associated with wildfire, and impacts would be less than significant.

Wildfire Cumulative Finding: The Project would not result in cumulative impacts to wildfire (Draft EIR page 5.20-12).

Facts in Support of Finding: There are multiple projects within the City of Riverside, in the general vicinity of the Project which may be affected by wildfires spreading across the site. As with the proposed Project, any cumulative project would be required to adhere to the requirements set forth in the CFC and Riverside Municipal Code and would be required to include fire sprinklers alarms, verified through the City's permitting process. Compliance with State and local standards would minimize wildfire risk at each project location, making cumulative impacts related to wildfire less than significant.

Potential Project impacts related to wildfire, when combined past, present, and reasonably foreseeable projects in the City, are not expected to result in a cumulatively significant impact. All future development applications would undergo environmental review pursuant to CEQA and any potential significant wildfire related impacts would require investigation to determine the nature and extent of the resources and appropriate mitigation measures. Impacts would therefore be less than cumulatively considerable and less than significant.

6.0 IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT WITH MITIGATION

The following potentially significant environmental impacts were analyzed in the Draft EIR and were determined to be less than significant with compliance with existing laws, codes and statutes, regulatory requirements, and implementation of identified feasible mitigation measures. The City has found in accordance with Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a) (1) that "Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment." which is referred to herein as "Finding 1."

Based on substantial evidence, the City finds that adoption of the mitigation measures set forth in this section would reduce the identified significant impacts to less than significant levels:

- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Tribal Cultural Resources

6.1 BIOLOGICAL RESOURCES

Impact Biological Resources Threshold D Finding: The Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant with mitigation (Draft EIR page 5.4-21).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure BIO-1.

Facts in Support of Finding: Wildlife corridors are areas where wildlife movement is concentrated due to natural or anthropogenic constraints and corridors provide access to resources such as food, water, and shelter. Animals use these corridors to move between different habitats and provide avenues for wildlife dispersal, migration, and contact between other populations. The Habitat Assessment describes that the Project site is not located within a designated wildlife corridor or linkage. Furthermore, no wildlife movement corridors were found to be present on or adjacent to the Project site during the field survey. Thus, no impacts related to wildlife movement corridors would occur with implementation of the Project.

The Project site has the potential to support songbird and raptor nests due to the presence of shrubs, ground cover, and trees. Project development activities could disturb or destroy active migratory bird nests including eggs and young. Disturbing or destroying active nests is a violation of the MBTA (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Game Code Section 3503. As such, direct impacts to breeding birds (e.g., through nest removal) or indirect impacts (e.g., by noise causing abandonment of the nest) is considered a potentially significant impact. Therefore, Mitigation Measure BIO-1 is included to require a nesting bird survey if vegetation is removed during nesting season (February 1st through August 31st). As such, with Mitigation Measure BIO-1, potential impacts to biological resources would be less than significant.

Mitigation Measures

Mitigation Measure BIO-1: Nesting Birds. Vegetation within and surrounding the Project site has the potential to provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the Project. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as nest abandonment and/or loss of reproductive effort, it is considered "take" and is potentially punishable by fines and/or imprisonment.

If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.

Biological Resources Cumulative Finding: The Project would not result in cumulative impacts to biological resources (Draft EIR page 5.4-23).

Facts in Support of Finding: The cumulative study area for biological resources encompasses the Riverside County MSHCP area. The Project would not have significant impacts related to jurisdictional waters, wildlife movement, local ordinances or regulations protecting biological resources, habitat conservation plans, plant communities, and habitat fragmentation. In addition, although the Project could have potentially significant impacts to nesting birds, compliance with Mitigation Measures BIO-1 would reduce potential impacts to less-than-significant levels.

Cumulative projects would also be required to comply with applicable survey requirements pursuant to Riverside County and MSHCP requirements and mitigation for biological resources, such as the Migratory Bird Treaty Act. Since all projects would be required to implement their respective mitigation measures, their contribution would not be cumulatively considerable. Therefore, Project impacts would be less than cumulatively considerable and thus less than significant.

6.2 CULTURAL RESOURCES

Impact Cultural Resources Threshold B Finding: The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 (. Impacts would be less than significant with mitigation (Draft EIR page 5.5-11).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure CUL-1.

Facts in Support of Finding: The Project site is currently heavily disturbed and has a low potential to impact archaeological resources. Additionally, neither the records search nor the field survey identified any evidence of archaeological resources on the site. Due to the disturbed nature of the site and the lack of evidence of previously identified archaeological resources, it is unlikely that implementation of the Project would impact an unknown archaeological resource. However, if the discovery of archaeological resources occurs during ground disturbing activities, Mitigation Measure CUL-1 would be implemented which would require work to be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist.

With the implementation of MM CUL-1, the Project's impacts related to archaeological resources would be reduced to a less than significant level.

Plans, Programs, or Policies

PPP CUL-1: Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.

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

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

Mitigation Measures

Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource. During implementation of the project, in the event that archaeological materials are encountered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for Professional Archaeology (United States Department of the Interior, 1983). Construction activities may continue in other areas. If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and CEQA Guidelines 15064.5 and 15126.4 in consultation with the City. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage, and treatment shall be required at the developer/applicant's expense.

6.3 GEOLOGY AND SOILS

Impact Geology and Soils Threshold F Finding: The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts would be less than significant with mitigation (Draft EIR page 5.3-4).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure PAL-1.

Facts in Support of Finding: The proposed Project consists of the development of industrial warehouse buildings and associated infrastructure improvements. Earthmoving activities, including grading and trenching activities, have the potential to disturb previously unknown paleontological resources. The Project site has been heavily disturbed due to past grading and development, and thus, has a reduced chance for sensitive paleontological resources or unique geological features. However, according to Riverside County Land Information Service Map My County, the Project site is in an area with high paleontological sensitivity.

Mitigation Measure GEO-1is included to require all construction plans and specifications to state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist has evaluated the find. Implementation of Mitigation Measure GEO-1 would reduce potential impacts related to paleontological resources to a less than significant level.

Geology and Soil Cumulative Finding: The Project would result in less than significant cumulative impacts related to Geology and Soils with implementation of Mitigation Measure PAL-1 (Draft EIR at p. 5.7-13).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure GEO-1.

Facts in Support of Finding: A cumulative impact could occur if development projects incrementally result in the loss of the same types of unique paleontological resources. As detailed previously, the Riverside County region, including the Project site, is identified as sensitive for paleontological resources. However, with incorporation of Mitigation Measure GEO-1, procedures for the unanticipated discovery, recovery, and curation of paleontological resources would be implemented to reduce potential significant impacts that could become cumulatively considerable. Thus, with incorporation of mitigation measures the potential for cumulatively considerable impacts would be less than significant.

Plans, Programs, or Policies

PPP GEO-1: CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in Chapter 16.08 of the Riverside Municipal Code to preclude significant adverse effects associated with seismic and soils hazards. CBC-related and geologist and/or civil engineer specifications for the proposed Project are required to be incorporated into grading plans and building specifications as a condition of construction permit approval.

Mitigation Measures

Mitigation Measure GEO-1: Paleontological Resources. Construction plans and specifications shall state that in the event that potential paleontological resources are discovered during excavation, grading, or

construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified profession paleontologist) has evaluated the find. If a fossil is determined to be significant, the qualified paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Western Science Center in Riverside County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If any fossil remains are discovered, the qualified paleontologist shall make a recommendation whether monitoring shall be required for the continuance of earth moving activities. Prior to commencement of grading activities, the City of Riverside Public Works Department, shall verify that all project grading and construction plans specify the requirements herein related to the unanticipated discovery of paleontological resources.

After completion of the salvage and curation of any resources, the qualified paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the City Director of the City Community Development Department, or designee, and the Western Science Center in Riverside County.

6.4 HAZARDS AND HAZARDOUS MATERIALS

Impact Hazards and Hazardous Materials Threshold A Finding: The Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials (Draft EIR page 5.9-17 – 5.9-20).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure HAZ-1.

Facts in Support of Finding:

Construction: The proposed construction activities would involve the routine transport, use, and disposal of hazardous materials such as paints, solvents, oils, and grease, during construction activities. In addition, hazardous materials would routinely be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and State regulations that are implemented by the City during building permitting for construction activities.

Construction contractors would also be required to comply with federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous materials. Additionally, construction activities would require a SWPPP, which is mandated by the NPDES General Construction Permit (included as PPP HYD-1) and enforced by the SARWQCB. Implementation of the SWPPP, as confirmed through the City's permitting process would limit potentially significant hazards from runoff of contaminated materials during construction to a less than significant level.

Contaminated Soils: The Phase I ESA found Volatile Organic Compounds (VOCs), including tetrachloroethylene (PCE) and trichloroethylene (TCE),at levels that exceed current regulatory screening

thresholds. These contaminants are attributed to known and suspected offsite sources. A soil vapor extraction (SVE) system was previously operated in 2020 and 2021 at the Project site to remove PCE and TCE impacted soil vapor. Soil vapor and groundwater investigations are ongoing under the regulatory oversight of the SARWQCB.

Consistent with regulatory requirements, the Project must comply with SCAQMD Rule 1166(soil excavation and grading) , CalOSHA hazardous waste materials handling regulations, and the California Health and Safety Code.. These requirements were developed to protect human health and the environment from the hazards associated with exposure.

In addition, due to the potential for minor shallow VOC-impacted soils to exist onsite, the project shall implement a Soil Management Plan (SMP), per SCAQMD Rule 1166 (included as PPP HAZ-1).The SMP would require handling of contaminated materials be conducted pursuant to existing SCAQMD, RWQCB, and DTSC standards, soil sampling to ensure non-reusable contaminated soils are removed and that a certified hazardous waste hauler remove and transport all hazardous materials, as needed, per California Hazardous Waste Regulations to a landfill permitted by the State to accept hazardous materials. The SMP would be submitted to the SARWQCB for review and approval and would be implemented during grading activities.

In addition, a Health and Safety Plan (HSP) shall be submitted for approval by Santa Ana Regional Water Quality Control Board (SARWQCB) prior to the issuance of a grading permit or other ground disturbing activities (included as Mitigation Measure HAZ-1) and implemented pursuant to OSHA Safety and Health Standards (29 Code of Federal Regulations [CFR} 1910.120). The HSP would outline health and safety requirements to minimize worker and public exposure to hazardous materials during construction, including vapor, water, and soil contamination. The HSP shall provide compliance with OSHA Safety and Health Standards and provide procedures in the event of release or human contact with hazardous materials during all construction activities. The HSP would establish monitoring protocols, action levels, and response criteria to address potential risk to workers and the public from soils containing VOCs that may be encountered during earth working activities.

Therefore, with implementation of Mitigation Measures HAZ-1 and compliance with SCAQMD Rules 1166 and 1466 (included as PPP HAZ-1), COSHA Safety and Health Standards (29 Code of Federal Regulations 1910.120), and CalOSHA requirements (CCR Title 8, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719), that would be verified by the City during Project permitting and inspections, impacts related to transport, use, or disposal of contaminated materials during construction would be less than significant.

Operation: The Project site would be developed with two industrial buildings that would support warehouse and office uses, operations of which would generally involve use of various types and quantities of hazardous materials, including lubricants, solvents, cleaning agents, wastes, paints and related wastes, petroleum, wastewater, and batteries. All hazardous materials would be used, stored, and disposed of in accordance with applicable federal, state, and local regulations enforced by USEPA, USDOT, CalEPA, CalOSHA, and DTSC (e.g., CFR Title 49, CCR Title 8, CFR Title 40 Part 263).

Under California Health and Safety Code Section 25531 et seq., CalEPA requires businesses operating with regulated substances above threshold quantities to register with the Certified Unified Program Agency (CUPA). If any tenant handles acutely hazardous materials (as defined in Health & Safety Code Section 25500), a permit from the Riverside County Fire Department (the local CUPA) would be required. Such businesses must also comply with California's Hazardous Materials Release Response Plans and Inventory Law, including immediate reporting to the County Fire Department and the Office of Emergency Services of

any release or threatened release. In addition, oil or fuel spills from trucks would be reported, remediated, and disposed of in compliance with CUPA and County Fire Department requirements.

The routine transport, use, and disposal of acute hazardous materials is not anticipated during operations, and compliance with existing laws and regulations governing routinely used hazard and hazardous materials would reduce potential impacts to less than significant.

Impact Hazards and Hazardous Materials Threshold B Finding: The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (Draft EIR pages 5.9-20 – 5.9-21).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure HAZ-1.

Facts in Support of Finding:

Construction: Project construction equipment has the potential to release gas, oils, greases, solvents, and spills of paint and other finishing substances. However, quantities of hazardous materials on site would be limited, and construction activities would be required to adhere to all applicable regulations regarding hazardous materials storage and handling, as well as to implement construction BMPs (through implementation of a required SWPPP implemented by City conditions of approval) to prevent a hazardous materials release and to promptly contain and clean up any spills, which would minimize the potential for harmful exposures. Compliance with existing laws and regulations, enforced through the City through construction permitting, would ensure that construction-related impacts would be less than significant.

C*ontaminated Soils:* The Phase I ESA found that soil vapor and groundwater investigations remain under the regulatory oversight of the SARWQCB. Furthermore, due to the potential for minor shallow VOC-impacted soils at the Project site, the Project shall prepare and implement a SMP through Mitigation Measure HAZ-1 for excavation, grading, and redevelopment activities. The SMP would ensure that soils are managed pursuant to existing South Coast Air Quality Management District (SCAQMD) Rule 1166 (PPP HAZ-1) and SARWQCB standards. A certified hazardous waste hauler is required to remove and transport all impacted soil and potentially hazardous materials in accordance with California Hazardous Waste Regulations to a landfill permitted by the State to accept such materials. In addition, a Health and Safety Plan (HSP), required under OSHA standards, would be prepared and implemented under Mitigation Measure HAZ-1 to minimize worker and public exposure, establish monitoring and response protocols, and address potential vapors or releases associated with contaminated soils.

Therefore, with implementation of Mitigation Measure HAZ-1 and compliance with SCAQMD Rule 1166 (PPP HAZ-1), verified through the City's permitting process, potential impacts related to contaminated soils or vapors would be reduced to less than significant.

C*ontaminated Water:* DCE, PCE, and TCE have routinely been detected in the groundwater underlying the Project site. oil vapor and groundwater investigations remain under the regulatory oversight of the SARWQCB. However, as documented in the Geotechnical Investigation groundwater at the site occurs at depths of approximately 116 to 120 feet below ground surface (bgs). Soil borings advanced to 25 feet bgs did not encounter groundwater. Project excavation is anticipated to extend to depths of approximately 15 feet bgs, which would not reach groundwater; therefore, contaminated groundwater would not be encountered during construction.

Although not anticipated, if excavation activities were to encounter groundwater, the Project would be required to comply with the General NPDES Groundwater Discharge Permit (No. CAG994004). This permit requires testing and treatment of any dewatered groundwater prior to discharge to ensure compliance with water quality standards.

Compliance with the requirements of the Groundwater Discharge Permit, implemented through the SARWQCB and the City's permitting process, would ensure that potential impacts related to contaminated groundwater remain less than significant.

Operation: The proposed Project would develop two new industrial warehouse buildings. Routine operations are not anticipated to require substantial quantities of hazardous materials. Limited amounts of diesel, gasoline, and oil may be associated with truck operations; however, no fueling, maintenance, or other industrial activities would occur onsite.

The proposed warehouse uses would involve only small volumes of typical products such as cleaners, paints, and consumer materials, which would not result in significant hazard. In addition, the Project would be required to prepare and implement a Water Quality Management Plan (WQMP) consistent with the Santa Ana Region MS4 Permit (Order No. R8-2010-0033), as described in Section 5.10, Hydrology and Water Quality. BMPs, incorporated into the WQMP, would protect human health and the environment by preventing and responding to any accidental spills or releases.

Existing soil vapor impacts at the 2069 Massachusetts Avenue and 1989 Massachusetts Avenue parcels are attributed to off-site sources south of the Project site. To address this, a Vapor Intrusion Mitigation System (VIMS) is included as part of the Project design (PDF HAZ-1) to avoid potential risk to future occupants.

Therefore, with compliance with existing regulations and implementation of PDF HAZ-1, the proposed Project's operations would not create a significant hazard to the public or the environment. Operational hazardous materials impacts would be less than significant.

Impact Hazards and Hazardous Materials Threshold E Finding. The Project would not result in a safety hazard or excessive noise for people residing or working in the project area for a project located within an airport land use plan or, where such a plan has not been adopted, be within two miles of a public airport or public use airport (Draft EIR page 5.9-22)

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure HAZ-2 through HAZ-5.

Facts in Support of Finding: The Project site is located approximately 2.9 miles east of the Flabob Airport, a small public-use facility in the City of Jurupa Valley. The nearest runway at Flabob Airport, Runway 6-24, has an elevation of 750 feet above mean sea level (AMSL). On June 11, 2024, an application for Major Land Use Action Review was submitted to the Riverside County Airport Land Use Commission (ALUC). On May 5, 2025, ALUC determined that FAA review would only be required for structures exceeding 1,039 feet AMSL. Since the Project's proposed maximum building elevation is 935 feet AMSL, FAA Obstruction Evaluation Service review is not warranted.

The Project site is also located approximately 7.9 miles northwest of March Air Reserve Base/Inland Port Airport. As shown in Figure 5.9-1 (Airport Land Use Compatibility Map), the Project site lies within Zone E of the March Air Reserve Base/Inland Port Airport's Airport Influence Area. Zone E prohibits hazards to flight

safety (e.g., tall objects, visual distractions, electronic interference), but does not restrict residential density or non-residential intensity.

On May 5, 2025, ALUC issued a Determination Letter finding the proposed Project consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, subject to conditions. These conditions include: (1) outdoor lighting must be downward facing to prevent light spillage; (2) prohibited uses/activities incompatible with airport operations; (3) notice of airport proximity must be provided to prospective purchasers or tenants; and (4) March Air Reserve Base must be notified of land uses involving electromagnetic radiation. These conditions are incorporated as Mitigation Measures HAZ-2 through HAZ-5.

With implementation of Mitigation Measures HAZ-2 through HAZ-5, the proposed Project would be consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Airport compatibility impacts would be less than significant with mitigation.

Hazards and Hazardous Materials Cumulative Impact Finding: The Project would not result in cumulative impacts related to hazards or hazardous materials (Draft EIR page 5.9-24).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact is less than significant with implementation of Mitigation Measure HAZ-1 through HAZ-5.

Facts in Support of Finding: Cumulative land use changes within the City of Riverside would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may contain hazardous materials. Thus, the proposed Project's contribution to cumulative impacts related to hazards and hazardous materials was analyzed in context with past and foreseeable future projects in the City that are similarly affected by VOCs and contaminated soils and groundwater conditions.

The severity of potential hazards for cumulative projects depends on the location, type, and size of development and the site-specific hazards involved. There are two closest cumulative projects, both located at 2610 Durahart Street, approximately 0.25 miles east of the Project site. Although the timing of construction for the adjacent cumulative project is unknown, it is possible that hazardous materials use during its construction could overlap with the proposed Project and other nearby development. Such overlapping activities could contribute to a cumulative hazard.

However, all hazardous materials users and transporters, as well as hazardous waste generators and disposers, must comply with federal, state, and regional regulations governing hazardous materials transport, use, storage, and disposal. Compliance is verified through the City's permitting and inspection processes.

Thus, if hazardous materials are found on cumulative or future project sites, remediation would be required under applicable regulations, reducing the potential for adverse impacts. For the proposed Project, regulatory compliance, implementation of the SMP, and the HSP would ensure hazardous soils and materials are properly managed and disposed of, preventing a cumulative contribution to hazards.

With regulatory compliance and implementation Mitigation Measure HAZ-1 (SMP and HSP), the Project's contribution to cumulative hazardous materials impacts would be less than significant and not cumulatively considerable.

Additoinally, potential cumulative impacts from the Project's proximity to Flabob Airport and March Air Reserve Base/Inland Port Airport would be addressed through ALUC consistency review. ALUC would provide conditions to ensure that future projects are designed and operated to avoid significant impacts related to airport safety and land use compatibility. With implementation of Mitigation Measures HAZ-2 through HAZ-5, the proposed Project would not result in significant impacts, and its contribution to cumulative impacts related to airport proximity would not be cumulatively considerable.

Plans, Programs, and Policies

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain coverage under the construction general permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that the planned excavation contractor possesses a current SCAQMD Rule 1166 Various Locations Mitigation Plan. The excavation contractor's Rule 1166 plan would provide for compliance with these requirements provided the plan remains valid and is approved by SCAQMD: Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading in areas where VOCs are suspected to potentially be present and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.

Project Design Features

PDF HAZ-1: Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.

Mitigation Measures

Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board.

The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be conducted by a contractor with a current SCAQMD Rule 1166 Various Locations Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the

North Parcel (and potentially other locations in the event that a previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities).

Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC-impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth working activities.

As part of the SMP, the Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination.

Mitigation Measure HAZ-2: Outdoor lighting. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.

Mitigation Measure HAZ-3: Prohibited Uses/Activities. The following uses/activities are not included in the proposed project and shall be prohibited at this site:

- Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
- Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
- Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, outdoor production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.
- Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- Any use which results in a hazard to flight.

Mitigation Measure HAZ-4: Notice of Airport in Vicinity. The "Notice of Airport in Vicinity" shall be provided to all prospective purchasers and occupants of the property.

Mitigation Measure HAZ-5: Electromagnetic Component Notification. March Air Reserve Base shall be notified of any land use having electromagnetic radiation. Sources of electromagnetic radiation include

radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.

6.5 TRIBAL CULTURAL RESOURCES

Impact TCR-2 Finding: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (Draft EIR page 5.18-9).

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that this impact would be less than significant with implementation of Mitigation Measures CUL-1, TCR-1, TCR-2, TCR-3, and TCR-4.

Facts in Support of Finding: On June 23, 2021, a Sacred Lands File search and a list of Native American tribes who may have knowledge of cultural resources in the Project area were requested from the NAHC. On August 5, 2021, the NAHC responded with a list of 22 Native American tribes and indicated that the Sacred Lands File search yielded negative results for known Tribal Cultural Resources or sacred lands within the Project vicinity. Additionally, the Project site has been previously disturbed, and the field survey did not identify any evidence of archaeological resources on the site. Due to the disturbed nature of the site and the lack of evidence of previously identified archaeological resources, it is unlikely that implementation of the Project would impact an unknown archaeological resource.

The City sent notices regarding the Project in November 2024 to the Native American tribes provided by the NAHC. Responses were received within the 30-day response window from a total of five tribes. Of the responding tribes, the City consulted with the following four: Gabrieleno Band of Mission Indians – Kizh Nation, Rincon Band of Luiseño Indians, Soboba Band of Luiseño Indians, and Cahuilla Band of Indians. The Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) responded to the AB 52 letter request and provided mitigation measures for consideration by the City but declined to consult. The City and consulting tribes agreed on the mitigation measures to be incorporated into the Project; however, after consultation with the Gabrieleno Band of Mission Indians – Kizh Nation, mutual agreement could not be reached. The City determined that it acted in good faith and a reasonable effort has been made; therefore, allowing the City to move forward with this project pursuant to Section 21080.3.2(b) of the Public Resources Code. As a result, MM TCR-1 through TCR-4, which require tribal consultation on any Project design changes, retention of an on call archaeologist and paleontologist during grading and significant ground disturbing activities, procedures for inadvertent discovery of tribal resources, and cultural sensitivity training for construction personnel, are incorporated into the Project. Additionally, as discussed in Draft EIR Section *5.5, Cultural Resources,* MM CUL-1 is incorporated into the Project to require work to be halted within 50 feet of an inadvertent archaeological find until it can be evaluated by a qualified archaeologist. Therefore, with implementation of Mitigation Measures CUL-1, TCR-1, TCR-2, TCR-3, and TCR-4 potential impacts to Tribal Cultural Resources would be less than significant.

Tribal Cultural Resources Cumulative Impact Finding: The Project would not result in cumulative impacts to tribal cultural resources. (Draft EIR page 5.18-10)

Pursuant to Public Resources Code Section 21081(a) and CEQA Guidelines Section 15091(a), the City hereby makes Finding 1 and determines that these impacts would be less than significant with implementation of Mitigation Measures CUL-1, TCR-1, TCR-2, TCR-3, and TCR-4.

Facts in Support of Finding: The cumulative tribal cultural resources impact assessment considers the development of the Project in conjunction with other development projects in the context of the influence areas of the tribes in the Riverside County region. There is potential for tribal cultural resources to be uncovered during construction activities from the Project. Other development projects within the region would have a similar potential to uncover tribal cultural resources. Cumulative impacts would be reduced by each development project's compliance with applicable regulations, consultations required by AB 52, and project-specific mitigation. Project implementation of MMs TCR-1 through TCR-4 and MM CUL-1 would reduce project-level impacts to less than significant. These mitigation measures ensure that the incremental impacts of the proposed Project would not combine with other projects and create a cumulatively considerable impact related to tribal cultural resources. Therefore, potential cumulative impacts would be less than significant.

Mitigation Measures

Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource. As listed in Section *5.5, Cultural Resources*.

Mitigation Measure TCR-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.

Mitigation Measure TCR-2: Project Archaeologist: Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Archaeologist and Paleontologist shall be on site during all grading and other significant ground-disturbing activities.

Mitigation Measure TCR-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. **Consulting Tribes Notified:** Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
2. **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 will need approval of the consulting tribe(s); and
3. **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 to the consulting tribe(s). The Applicant 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:

a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
b. Upon consultation with the tribe(s) and if parties agree that reburial on project site is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79, if agreed upon by the tribe(s), and therefore will be professionally curated. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and
d. 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 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 will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.

Mitigation Measure TCR-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

7.0 FINDINGS REGARDING GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(e) requires that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general terms, a project may foster spatial, economic, or population growth in a geographic area. To address these issues, potential growth-inducing effects were examined through analysis of the following questions:

- Directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment;
- Remove obstacles to population growth;
- Require the construction of new or expanded facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Impact Growth-1 Finding: The Project would not directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment. Impacts would be less than significant (Draft EIR page 6-1 – 6-2).

Facts in Support of Finding: The proposed Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City's population. However, the proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. The Project would require the need for approximately 194 employees, based on employment generation rates listed in Table 3.G of the *Riverside County General Plan EIR*, which lists an employment generation factor for light industrial uses of 1 employee per 1,030 SF.

According to SCAG's 2024 RTP/SCS population and household growth forecast for City of Riverside, between 2019 and 2050, SCAG anticipates an employment increase of 45,900 additional jobs (from 158,600 to 204,500), yielding a 28.9 percent growth rate. SCAG regional growth forecasts are based upon, among other things, land uses designated in land use plans. As such, a project that is consistent with the land use designated in a General or Specific Plan would be consistent with SCAG's growth projections. The proposed Project is consistent with the site's existing land use designation therefore the projected increases in employment resulting from the Project are within SCAG's 2024 RTP/SCS projected increases. Thus, Project-related growth would not be unexpected or constitute substantial unplanned growth.

The proposed Project may cause indirect economic growth as it would generate revenue to the City through taxes generated by the development. Additionally, employees (short-term construction and long-term operational employees) from the Project site would purchase goods and services in the region, but any secondary increase in employment growth associated with meeting these incremental demands would be marginal, as these goods and services could be accommodated by existing providers. The Project is highly unlikely to result in any new or additional physical impacts to the environment based on the amount of existing and planned future commercial and retail services, which can serve Project employees, available in areas near the Project site.

In addition, the proposed Project would create jobs, a majority of which would likely be filled by residents of the City of Riverside and the surrounding Riverside County areas. The employees that would fill these roles are anticipated to come from within the City or the region, as the number of individuals employed in manufacturing, transportation, and warehousing is 27,377 in the City of Riverside, 169,172 in Riverside County, 196,819 in the City of San Bernardino, 27,266 in Fontana, and 20,567 in Ontario. Due to these numbers of skilled industrial laborers in the region, it is anticipated that new employees at the Project site would already reside within commuting distance and would not generate substantial needs for any housing. Employees would live in housing either already built or planned for development in the City and the surrounding Riverside County areas.

Because it is anticipated that most of the future employees from implementation of the Project would already be living in the region, the Project's introduction of employment opportunities would not induce substantial growth in the area and cause the need for additional housing. Thus, the Project would not result in the influx of new labor to serve the increased economic activities that would result from implementation of the Project.

Impact Growth-2 Finding: The Project would not remove obstacles to growth through the construction or extension of major infrastructure facilities that do not presently exist in the Project area or would add substantial capacity that could accommodate additional unplanned growth. Impacts would be less than significant (Draft EIR page 6-2).

Facts in Support of Finding: The Project proposes installation of new potable water lines, and sewer lines on the site that would connect to surrounding, existing infrastructure in order to accommodate the demands of the Project. However, the proposed infrastructure improvements have been designed to serve only the demands of the Project. Therefore, the Project would not expand sewer services into unplanned areas and would not result in significant growth inducing impacts.

The Project does not propose roadway extensions into new undeveloped areas that would allow for additional growth and development.

Impact Growth-3 Finding: The Project would not require the construction of new or expanded facilities that could cause significant environmental effects. Impacts would be less than significant (Draft EIR page. 6-2 – 6-3).

Facts in Support of Finding: The proposed Project would slightly increase the demand for fire protection and emergency response and police protection. However, as described in Section 5.19, *Utilities*, of the Draft EIR, the Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service for public services. Based on service ratios and build out projections, the Project would not create a demand for services beyond the capacity of existing facilities. Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

Impact Growth-4 Finding: The Project would not encourage or facilitate other activities that could significantly affect the environment individually or cumulatively. Impacts would be less than significant (Draft EIR at p. 6-3).

Facts in Support of Finding: Surrounding Project areas are already developed with commercial and industrial uses. Therefore, the Project would not spur increased development in surrounding areas. Additionally, the proposed infrastructure is only sized to serve the Project and would not have capacity to serve additional development projects in the area. The Project does not propose changes to any of the City's building safety standards (i.e., building, grading, plumbing, mechanical, electrical, or fire codes). The proposed Project would comply with all applicable City plans, policies, and ordinances. In addition, Project features and mitigation measures have been identified within this EIR to ensure that the Project minimizes environmental impacts. The proposed Project would not involve any precedent-setting action that could encourage and facilitate other activities that significantly affect the environment.

8.0 SIGNIFICANT IRREVERSIBLE EFFECTS

Section 15126.2(d) of the CEQA Guidelines requires that the EIR consider whether "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely…. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;

- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

The Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project site would be committed to warehousing and industrial uses once the proposed buildings are constructed. Secondary effects associated with this irreversible commitment of land resources include:

    - Increased traffic on area roadways (see Section 5.17 of the Draft EIR, *Transportation*).
    - Emissions of air pollutants and greenhouse gas emissions associated with Project construction and operation (see Section 5.3 of the Draft EIR, *Air Quality*, and Section 5.8 of the Draft EIR, *Greenhouse Gas Emissions*).
    - Consumption of non-renewable energy associated with construction and operation of the proposed Project due to the use of automobiles, trucks, lighting, heating, and cooling systems, appliances, etc. (see Section 5.6 of the Draft EIR, *Energy*).
    - Increased ambient noise associated with an increase in activities and traffic from the Project (see Section 5.13 of the Draft EIR, *Noise*).
    - Construction of the proposed Project as described in Section 3 of the Draft EIR, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

In regard to energy usage from the Project, as demonstrated in the analysis contained in Section 5.6 of the Draft EIR, *Energy*, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of proposed development. The proposed development would incorporate energy-conserving Project design features, including those required by the California Building Code, California Energy Code Title 24, which specify green building standards for new developments. In addition, as listed in Section 5.8 of the Draft EIR, *Greenhouse Gas Emissions*, the proposed Project would include sustainability features in line with Title 24 requirements that result in additional energy-efficiency. Project specific information related to energy consumption is provided in Section 5.6, *Energy*, of the Draft EIR.

9.0 FINDINGS REGARDING PROJECT ALTERNATIVES

The City of Riverside hereby declares that it has considered and rejected as infeasible the alternatives identified in the Draft EIR and described below. Section 15126.6 of the CEQA Guidelines requires an EIR to describe a range of reasonable alternatives to the Project, or to the location of the Project, which could feasibly achieve most of its basic objectives, but would avoid or substantially lessen any of the significant effects identified in the EIR analysis. An EIR is not required to consider every conceivable alternative to a proposed project. Rather, an EIR must consider a reasonable range of alternatives that are potentially feasible; an EIR is not required to consider alternatives that are infeasible. In addition, an EIR should evaluate the comparative merits of the alternatives. Therefore, this section sets forth the potential alternatives to the Project analyzed in the EIR and evaluates them in light of the objectives of the Project, as required by CEQA.

Key provisions of the CEQA Guidelines relating to an alternatives analysis (Section 15126.6 et seq.) are summarized below:

- The discussion of alternatives shall focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more costly.
- The "No Project" alternative shall be evaluated along with its impact. The "No Project" analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the Project is not approved.
- The range of alternatives required in an EIR is governed by a "rule of reason;" therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative if its effects cannot be reasonably ascertained and its implementation is remote and speculative.

9.1 RATIONALE FOR SELECTING POTENTIALLY FEASIBLE ALTERNATIVES

The alternatives must include a no-project alternative and a range of reasonable alternatives to the proposed Project if those reasonable alternatives would attain most of the Project objectives while substantially lessening the potentially significant project impacts. The range of alternatives discussed in an EIR is governed by a "rule of reason," which the CEQA Guidelines Section 15126.6(f)(3) defines as:

> ". . . set[ting] forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making."

Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in the CEQA Guidelines Section 15126.6(f)([1]) are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the Project proponent could reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative if its effects could not be reasonably identified and its implementation is remote or speculative.

For purposes of the EIR analysis, the Project alternatives are evaluated to determine the extent to which they attain the basic Project objectives, while significantly lessening any significant effects of the proposed Project.

9.2 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to *CEQA Guidelines* Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The Lead Agency may make an initial determination as to which alternatives are potentially feasible and therefore merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (*CEQA Guidelines* Section 15126.6(f)(3)). This section identifies alternatives considered by the Lead Agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the Project Objectives, are infeasible, or do not avoid any significant environmental effects.

Alternate Site Alternative

An alternate site for the Project was eliminated from further consideration. Based on a review of available sites for sale and the City of Riverside land use map, there are no other available, suitable sites within the control of the Project Applicant. However, in the event that land could be purchased of suitable size, the Project could have the same potential impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources. Moreover, other possible sites were not located in proximity to I-215, SR-91, Interstate 605 (I-605), established truck routes, and with access to available infrastructure, including roads and utilities thereby possibly resulting in further potential impacts. Therefore, analysis of an alternative site for the proposed Project is neither meaningful nor necessary, because the impacts and need for mitigation resulting from the proposed Project would not be avoided or substantially lessened by its implementation. Given these reasons, it would be infeasible to develop and operate the Project on an alternate site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternative Site Alternative was rejected from further consideration.

9.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSES

The following three alternatives to the Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the Project Objectives, may avoid or substantially lessen the Project's significant impact, avoid the need for mitigation, or are feasible from a development perspective. These alternatives have been developed based on the criteria identified above and are evaluated below.

- No Project/No Development Alternative (Alternative 1)
- Reduced Project Alternative (Alternative 2)
- No Project/Buildout of Employment Emphasis Subdistrict (Alternative 3)

9.3.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Description

Under this alternative, the Project would not be developed, and no development would occur. The Project site would remain in its existing condition, operating as commercial/industrial buildings, parking and storage lot, and bus parking and storage yard. In accordance with the CEQA Guidelines, the No Project/No Development Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the *CEQA Guidelines* states that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."

Accordingly, Alternative 1: No Project/No Development provides a comparison between the environmental impacts of the Project in contrast to the result from not approving, or denying, the Project. Thus, this alternative is intended to meet the requirements of *CEQA Guidelines* Section 15126.6(e) for evaluation of a no project alternative.

Finding

The City finds that the No Project/ No Development Alternative would result in maintaining the existing site conditions which is currently developed with two commercial/industrial buildings on 2626 Kansas Avenue, a lot used for bus parking and storage at 2069 Massachusetts Avenue, and a bus parking and storage yard

with two buildings at 1989 Massachusetts Avenue. The proposed redevelopment would not occur under the No Project/No Development Alternative. As a result, this alternative would avoid the need for mitigation measures, which include measures related to biological resources, cultural resources, geology and soils, hazards and hazardous, and tribal cultural resources. This alternative would result in no significant and unavoidable impacts, consistent with the proposed Project. This alternative would result in lessened impacts to 16 of the 20 environmental topics analyzed.

However, the environmental benefits of the proposed Project would also not be realized, including, but not limited to removal and disposal of the existing contaminated soils and the generation of approximately 194 jobs within the City of Riverside at full buildout.

This alternative would not meet any of the Project objectives, would not make efficient use of the site for employment uses, would not attract new businesses and employment, would not reduce the need for residents to commute outside the Project vicinity to work, would not help meet demand for logistic businesses in the city and surrounding region, would not redevelop the site with up-to-date efficient building standards, and would not build a project that is compatible with the surrounding industrial and manufacturing uses that were recently built or approved for construction. These reasons, separately and independently, are a sufficient basis upon which to reject this alternative.

9.3.2 ALTERNATIVE 2: REDUCED PROJECT ALTERNATIVE

Description

The Reduced Project Alternative consists of development of the Project site in a manner similar to the Project, but with a 50 percent reduction in square footage. Specifically, the Reduced Project Alternative would result in construction of one 99,900 SF Class A warehouse building with 17 dock doors on 2626 Kansas Avenue; 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue. Development under the Reduced Project Alternative would reduce Project square footage by approximately 50 percent, or by 99,950 SF.

Consistent with the proposed Project, the Reduced Project Alternative would construct five new driveways: a cul-de-sac driveway along Roberta Street, a second driveway along Roberta Street, two driveways along Kansas Avenue, and one driveway along Massachusetts Avenue. Consistent with the proposed Project, improvements on-site would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. Like in the proposed Project, this alternative would not involve redevelopment/construction on 1989 Massachusetts Avenue, and the Reduced Project Alternative does not require off-site improvements. Areas planned for physical impact would be the same as the proposed Project.

Finding

The City finds that the Reduced Project Alternative would reduce the Project's number of buildings (from two buildings to one building), resulting in a reduction in square footage of approximately 50 percent. Areas planned for physical impact on- and off-site would be identical to those required for development of the proposed Project. The Reduced Project Alternative would result in lessening of impacts to nine of the 20 environmental topics analyzed in the Draft EIR. However, this alternative would not change the overall impact conclusions (impact level) of any of the 20 environmental topics analyzed in the Draft EIR. All mitigation measures included in the Project for biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources would still be applicable to this alternative.

The Reduced Project Alternative would partially meet the majority of Project objectives, but not to the same extent as the proposed Project. This alternative would attract new businesses and employment, reduce the need for residents to commute outside the Project vicinity to work, help meet demand for logistic businesses in the city and surrounding region, redevelop the site with up-to-date efficient building standards, and build a project that is compatible with the surrounding industrial and manufacturing uses that were recently built or approved for construction. However, this alternative would not meet the main Project objectives to the same extent as the proposed Project, as it represents a reduced version of the proposed Project and would therefore achieve the same goals to a lesser degree. This alternative would result in a reduction of 97 employees (50 percent) in comparison to the proposed Project. These reasons, separately and independently, are a sufficient basis upon which to reject this alternative.

9.3.3 ALTERNATIVE 3: NO PROJECT/BUILDOUT OF EMPLOYMENT EMPHASIS SUBDISTRICT

Description

The No Project/Buildout of Employment Emphasis Subdistrict would develop the Project site consistent with the existing I – General Industrial zoning designation, Innovation District Overlay (ID) Overlay Zone, and Employment Emphasis (EE) subdistrict. However, this alternative would require an amendment to the City's zoning code and map to redesignated all three parcels as exclusively EE, eliminating the existing partial subdistrict designation of Housing Emphasis (HE), and amendment the exiting General Plan land use designation from Industrial (I) to Mixed Use-Urban (MU-U), which allows for primarily high-density residential development with commercial, office, institutional and business uses.

The No Project/Buildout of Employment Emphasis Subdistrict Alternative would construct two new two-story mix-use office and residential buildings on a 10.21-acre portion of the site (2626 Kansas Avenue and 2069 Massachusetts Avenue), designed to be a regionally important employment center with a limited mix of residential uses to compliment the employment focus. Each two-story building would be approximately 224,380 SF with a total footprint of approximately 112,190 SF and consist of 60 percent (or 134,628 SF) of office space (admin and professional) and 40 percent (or 89,752 SF) residential space on the second floor. Consistent with the EE subdistrict development standards, residential units would average 500 SF, for a total of 150 dwelling units per building. Building 1 would be on a 5.15-acre lot, resulting in a FAR of 1.0. Building 2 would be on a 5.06-acre lot, resulting in a FAR of 1.0.

Consistent with the proposed Project, the No Project/ Buildout of Employment Emphasis Subdistrict Alternative would construct an on-site drainage system comprised of two underground detention/infiltration systems and five new driveways: a cul-de-sac driveway along Roberta Street, a second driveway along Roberta Street, two driveways along Kansas Avenue, and one driveway along Massachusetts Avenue. Consistent with the proposed Project, improvements on-site would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and drive aisles. Areas plan for grading and physical impact would be consistent with the proposed Project. Like the proposed Project, this alternative would not involve redevelopment or construction at 1989 Massachusetts.

Finding

The City finds that the No Project/Buildout of Employment Emphasis Subdistrict Alternative would not result in a reduction of impacts to any of the 20 environmental topics analyzed in the Draft EIR and all mitigation measures included in the Project for biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources would still be applicable to this alternative. Furthermore, additional mitigation measures related to air quality, greenhouse gas emissions, noise, population and

housing, recreation, and transportation may be required as a result of the increase in number of trips/mobile emissions from this alternative as compared to the Project. The additional trips are from the office and residential uses associated with this alternative and the approximately 55 percent increase in building square footage as compared to the Project. This alternative would increase impacts to 11 of the 20 environmental topics analyzed in the Draft EIR, and would have potential to increase the impact level to six of the 20 topics analyzed.

The No Project/Buildout of Employment Emphasis Subdistrict Alternative would meet two, partially meet one, and would not meet three of the six Project objectives. This alternative would efficiently use the site to attract new businesses and employment to the City of Riverside, partially reducing the need for the local workforce to commute outside of the Project vicinity. However, the admin and professional offices may require employees with specialized skills that may currently be limited within the region, potentially attracting workers from outside the immediate area. This alternative would not redevelop the site with industrial warehouse buildings that are similar to and compatible with other industrial buildings that were recently built or recently approved in the vicinity. As such, this alternative would not meet all of the Project objectives to the same extent as the proposed Project would, since the proposed Project would accomplish the same goals, but generally to a greater degree. These reasons, separately and independently, are a sufficient basis upon which to reject this alternative.

9.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project/No Development Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

The Environmentally Superior Alternative (other than the No Project/No Build Alternative) would be Alternative 2: Reduced Project Alternative, which would involve developing the Project site with one 99,900 SF Class A warehouse building with 17 dock doors on 2626 Kansas Avenue; 2069 Massachusetts Avenue would be repaved and restriped and would allow for existing storage and bus parking operations to continue.

This alternative would result in lessened impacts to 9 of the 20 environmental topics analyzed in the Draft EIR, but would not reduce the impact level to any environmental topics. This alternative would be required to implement the same applicable mitigation measures as the proposed Project. Like the proposed Project, the Reduced Project Alternative would not result in any significant and unavoidable impacts. The Reduced Project Alternative would not meet the Project objectives to the same extent as the proposed Project and would have reduction of 97 employees (50 percent) in comparison to the proposed Project.

CEQA does not require the Lead Agency (the City of Riverside) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm.

10.0 FINDINGS REGARDING THE MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Section 21081.6 of the Public Resources Code requires that when making findings required by Section 21081(a) of the Public Resources Code, the Lead Agency approving a project shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval, in order to ensure compliance with project implementation and to mitigate or avoid significant effects on the environment. The City hereby finds that:

1. A MMRP has been prepared for the Project, and the mitigation measures are included therein. The MMRP is incorporated herein by reference and is considered part of the record of proceedings for the Project.
2. The MMRP designates responsibility for implementation and monitoring of proposed mitigation measures. The City's Community and Economic Development Director or their designee will serve as the overall MMRP coordinator and will be primarily responsible for ensuring that all mitigation measures are complied with.
3. The MMRP prepared for the Project has been adopted concurrently with these Findings. The MMRP meets the requirements of Section 21021.6 of the Public Resources Code. The City will use the MMRP to track compliance with mitigation measures. The MMRP will remain available for public review during the compliance period.

11.0 CERTIFICATION OF THE FINAL EIR

The City of Riverside finds that it has reviewed and considered the Final EIR in evaluating the proposed Project, that the Final EIR is an accurate and objective statement that fully complies with CEQA, and that the Final EIR reflects the independent judgment of the City.

The City of Riverside declares that no new significant information as defined by CEQA Guidelines, section 15088.5 has been received by the City after circulation of the Draft EIR that would require recirculation.

The City of Riverside certifies the EIR based on the entirety of the record of proceedings, including but not limited to the following findings and conclusions:

Findings:

The EIR does not identify significant environmental impacts that cannot be mitigated to a level of insignificance. All environmental impacts would have a less-than-significant impacts after the implementation of identified mitigation measures.

Conclusions:

1. All significant environmental impacts from the implementation of the proposed Project have been identified in the EIR and, with implementation of existing regulations and the mitigation measures identified, will be mitigated to a level of insignificance.
2. Other alternatives to the proposed Project, which could potentially achieve the basic objectives of the proposed Project, have been considered and rejected in favor of the proposed Project.
3. Environmental, economic, social, and other considerations and benefits derived from the development of the proposed Project override and make infeasible any alternatives to the proposed Project or further mitigation measures beyond those incorporated into the proposed Project.

12.0 CONCLUSION

Implemented through the MMRP, the mitigation measures previously listed, in conjunction with the above findings, will eliminate or reduce Project related environmental impacts to a less-than-significant level.

Collectively, the Final EIR, the PDFs, the PPPs, and the mitigation measures as listed in the MMRP provide an acceptable rationale for approval of the proposed Project.

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EXHIBIT B

MITIGATION MONITORING AND REPORTING PROGRAM

4. Mitigation Monitoring and Reporting Summary

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires a lead or public agency that approves or carries out a project for which an Environmental Impact Report (EIR) has been certified, which identifies one or more significant adverse environmental effects and where findings with respect to changes or alterations in the project have been made, to adopt a "…reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment" (Public Resources Code Sections 21081, 21081.6).

A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures are successfully implemented. The City of Riverside is the Lead Agency for the Project and is responsible for implementation of the MMRP. This report describes the MMRP for the Project and identifies the parties that will be responsible for monitoring implementation of the individual mitigation measures in the MMRP.

4.2 MITIGATION MONITORING AND REPORTING PROGRAM

The MMRP for the Project will be active through all phases of the Project, including design, construction, and operation. The attached table identifies the mitigation program required to be implemented by the City of Riverside for the Project. The table identifies mitigation measures required by the City of Riverside to mitigate or avoid significant impacts associated with the implementation of the Project, the timing of implementation, and the responsible party or parties for monitoring compliance.

The MMRP also includes a column that will be used by the compliance monitor (individual responsible for monitoring compliance) to document when implementation of the measure is completed. As individual Plans, Programs, and Policies, Project Design Features (PDF), and mitigation measures are completed, the compliance monitor will sign and date the MMRP, indicating that the required actions have been completed.

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Table 4-1: Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
AESTHETICS				
PPP AES-1: Light and Glare. All lights shall be directed and/or shielded to prevent the light from adversely affecting adjacent properties. No structure or lighting feature shall be permitted which creates adverse glare. A photometric plan shall be provided that indicates the amount of light emanating from the proposed/existing light fixtures to comply with City of Riverside Municipal Code Chapter 19.556, Outdoor Lighting.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AES-1: Lighting Design. The Project's lighting would be designed to adhere to the recommended lighting practices in the Attorney General's Warehouse Projects Best Practices. All Project lighting would be designed to be directed into the interior of the site. Additionally, all Project lighting would include use of full cut-off light shields and/or anti-glare lighting.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
AIR QUALITY				
PPP AQ-1: Rule 403. The Project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 403, which includes the following: • All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions. • The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day. • The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.	Prior to demolition, grading, and construction permits.	City of Riverside Engineering Division and Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
PPP AQ-2: Rule 1113. The Project is required to comply with the provisions of SCAQMD Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used.	Prior to demolition and construction permits.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
PPP AQ-3: Rule 1470. The Project is required to obtain permits from SCAQMD for the proposed diesel fire pumps and emergency generators	Prior to issuance of certificate of occupancy.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
and would be required to comply with Rule 1470, regulating the use of diesel-fueled internal combustion engines.				Date: _____
PPP AQ-4: Rule 402. The Project is required to comply with the provisions of SCAQMD Rule 402. The Project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.	Prior to demolition and construction permits.	City of Riverside Building & Safety Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-1: The Project would use light-colored paving and roofing materials. This design feature would reduce heat absorption, thereby lowering cooling demands and associated energy use, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-2: The Project would use Energy Star heating, cooling, and lighting devices and appliances. This design feature would increase energy efficiency and reduce electricity demand, which in turn would reduce operational air quality impacts. No quantitative credit was taken in the air quality analysis for this design feature.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-3: The Project would be designed to include the installation of signs at every truck exit providing directional information to the trucks' routes. This design feature would prevent nearby sensitive receptors from further exposure to criteria pollutants during the operation of the Project. No quantitative credit was taken in the air quality analysis for this design feature.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-4: The Project would have a truck check-in point inside of the Project site, consistent with best practices for siting and designing warehouse facilities. This design feature would help manage truck circulation on-site and reduce idling on surrounding roadways, thereby minimizing operational exposure of nearby sensitive receptors to criteria pollutants. No quantitative credit was taken in the air quality analysis for this design feature.	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
PDF AQ-5: The Project would be designed to provide overnight truck parking inside of the Project site. This design feature would encourage trucks to not park overnight near sensitive receptors and prevent further exposure to criteria pollutants during the operation of the Project. No	Prior to Project Approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
quantitative credit was taken in the air quality analysis for this design feature.				
BIOLOGICAL RESOURCES				
Mitigation Measure BIO-1: Nesting Birds. Vegetation within and surrounding the Project site has the potential to provide refuge cover from predators, perching sites and favorable conditions for avian nesting that could be impacted by construction activities associated with the Project. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.3, 3511, and 3513 of the California Fish and Game Code prohibit the take, possession, or destruction of birds, their nests or eggs). In order to protect migratory bird species, a nesting bird clearance survey should be conducted prior to any ground disturbance or vegetation removal activities that may disrupt the birds during the nesting season. Consequently, if avian nesting behaviors are disrupted, such as nest abandonment and/or loss of reproductive effort, it is considered "take" and is potentially punishable by fines and/or imprisonment. If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three (3) days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds will be disturbed during construction. The biologist conducting the clearance survey should document a negative survey with a brief letter report indicating that no impacts to active avian nests will occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities should stay outside of a no-disturbance buffer. The size of the no-disturbance buffer will be determined by the wildlife biologist and will depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors will be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest will be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor should be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have	Prior to issuance of grading permits.	City of Riverside Engineering Division and Building & Safety Division.	Submittal of Pre-construction Clearance Survey report to City by Qualified Biologist.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.				
CULTURAL RESOURCES				
PPP CUL-1: Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Applicant shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) to determine the most appropriate means of treating the human remains and any associated grave artifacts.The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052) determined in consultation between the Project proponent and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply and the median and decision process will occur with the NAHC (see Public Resources Code Section 5097.98(e) and 5097.94(k)).	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	Provide evidence to the City that developer/permit holder has complied with State Health and Safety Code Section 7050.5. Provide evidence to the City that the San Bernardino County Coroner has contacted the Native American Heritage Commission within 24 hours of discovery.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource. During implementation of the project, in the event that archaeological materials are encountered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for Professional Archaeology (United States Department of the Interior, 1983). Construction activities may continue in other areas. If the find is considered a "resource" the archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and CEQA Guidelines 15064.5 and 15126.4 in consultation with the City. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if unique archaeological resources cannot be preserved in place or left in an undisturbed state, recovery, salvage, and treatment shall be required at the developer/applicant's expense.	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	Provide evidence to the City that a qualified Archeological has been retained. Submittal of report that documents the finding to the City.	Initials: _____ Date: _____
GEOLOGY AND SOILS				
PPP GEO-1: CBC Compliance. The Project is required to comply with the California Building Standards Code (CBC) as included in Chapter 16.08 of the Riverside Municipal Code to preclude significant adverse effects associated with seismic and soils hazards. CBC-related and geologist and/or civil engineer specifications for the proposed Project are required to be incorporated into grading plans and building specifications as a condition of construction permit approval.	Prior to grading and construction permits.	City of Riverside Engineering Division and Building & Safety Division.	City approval of construction plans.	Initials: _____ Date: _____
Mitigation Measure GEO-1: Paleontological Resources. Construction plans and specifications shall state that in the event that potential paleontological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified paleontologist (who meets the Society of Vertebrate Paleontology's (SVP, 2010) definition for qualified profession paleontologist) has evaluated the find. If a fossil is determined to be significant, the qualified paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, non-profit institution	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	City approval of construction plans. Halt any work in the event of paleontological resource discovery. Provide evidence to the City that a	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
with a research interest in the material and with retrievable storage, such as the Western Science Center in Riverside County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. If any fossil remains are discovered, the qualified paleontologist shall make a recommendation whether monitoring shall be required for the continuance of earth moving activities. Prior to commencement of grading activities, the City of Riverside Public Works Department, shall verify that all project grading and construction plans specify the requirements herein related to the unanticipated discovery of paleontological resources. After completion of the salvage and curation of any resources, the qualified paleontologist shall prepare a report summarizing the results of the monitoring and salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted to the City Director of the City Community Development Department, or designee, and the Western Science Center in Riverside County.			qualified paleontologist has been retained. Submittal of report that documents the finding to the City.	
HAZARDS AND HAZARDOUS MATERIALS				
PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain coverage under the construction general permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	Provide evidence of compliance with the NPDES requirement to the City Public Works Department. Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.	Initials: _____ Date: _____
PPP HAZ-1: SCAQMD Rule 1166. Prior to issuance of grading or excavation permits, the Project applicant shall submit verification to the City Building and Safety Division that the planned excavation contractor possesses a current SCAQMD Rule 1166 Various Locations Mitigation Plan. The excavation contractor's Rule 1166 plan would provide for	Prior to issuance of grading or excavation permits.	City of Riverside Building and Safety Division.	Submit verification to the City Building and Safety Division that the planned	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
compliance with these requirements provided the plan remains valid and is approved by SCAQMD: Monitor for VOC contamination at least once every 15 minutes commencing at the beginning of excavation or grading in areas where VOCs are suspected to potentially be present and record all VOC concentration readings. Handling VOC-contaminated soil at or from an excavation or grading site shall segregate VOC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. VOC-contaminated soil stockpiles shall be sprayed with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. A daily visual inspection shall be conducted of all covered VOC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. Contaminated soil shall be treated or removed from an excavation or grading site within 30 days from the time of excavation.			excavation contractor possesses a current SCAQMD Rule 1166 Various Locations Mitigation Plan.	
PDF HAZ-1: Vapor Intrusion Mitigation System (VIMS). A Vapor Intrusion Mitigation System (VIMS) shall be incorporated into the Project design to prevent potential vapor intrusion risks.	Prior to Project approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
Mitigation Measure HAZ-1: Soil Management Plan (SMP) and Health and Safety Plan (HSP). Prior to issuance of a grading or excavation permit a SMP shall be approved by the Santa Ana Regional Water Quality Control Board. The SMP will describe general methods for the identification and management of soils potentially impacted by VOCs Site-wide. In areas where VOCs are suspected to potentially be present in soil (i.e., in the vicinity of areas previously identified on the North Parcel and any other areas in which potential VOC impacted soils are otherwise identified), earth working activities will be conducted by a contractor with a current SCAQMD Rule 1166 Various Locations Plan, and the SMP will describe the methods to identify, manage, and dispose of "VOC Contaminated Soil" as defined in Rule 1166 (i.e., soils emitting VOCs at concentrations greater than 50 parts per million [ppm] as hexane). The SMP will also describe more conservative monitoring criteria and thresholds for targeted excavation of soils in suspected historical VOC release areas on the North Parcel (and potentially other locations in the event that a previously unidentified VOC or petroleum hydrocarbon release area is discovered during earth working activities).	Prior to issuance of a grading or excavation permit.	Santa Ana Regional Water Quality Control Board.	Santa Ana Regional Water Quality Control Board approval of SMP and HSP.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
Per SCAQMD Rule 1166, the SMP shall include protocols for minimizing VOC emissions into the atmosphere during construction, including excavation, grading, handling, and treatment of VOC-impacted soils, and shall describe associated notification requirements, monitoring requirements, soil handling protocols, and recordkeeping requirements. In the event that "VOC-contaminated soil" is identified as defined within Rule 1166, the soil shall be handled in accordance with the Rule and the associated Various Locations Plan. A project-specific Health and Safety Plan (HASP) shall also be prepared in accordance with California Occupational Safety and Health Administration (OSHA) standards and other applicable rules and regulations, which will incorporate appropriate health and safety precautions to be implemented to protect workers and the public from exposure to potentially hazardous substances that may be encountered during these earth working activities. As part of the SMP, the Project Applicant and/or the construction contractor(s) shall retain a qualified professional to prepare a site-specific HSP in accordance with federal Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1910.120) and California OSHA regulations (8 CCR Section 5192). The HSP shall be implemented by the construction contractor to protect construction workers, the public, and the environment during all ground-disturbing activities from exposure to hazardous materials, including vapor and soil contamination.				
Mitigation Measure HAZ-2: Outdoor lighting. Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.	Prior to Project approval.	City of Riverside Planning Division.	City approval of Final plans.	Initials: _____ Date: _____
Mitigation Measure HAZ-3: Prohibited Uses/Activities. The following uses/activities are not included in the proposed project and shall be prohibited at this site: 1. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. 2. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or	Prior to Project approval.	City of Riverside Planning Division.	City approval of Final plans and Conditions of Approval.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
towards an aircraft engaged in a straight final approach towards a landing at an airport. 3. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, outdoor production of cereal grains, sunflower, and row crops, composting operations, wastewater management facilities, artificial marshes, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators. 4. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. 5. Any use which results in a hazard to flight.				
Mitigation Measure HAZ-4: Notice of Airport in Vicinity. The "Notice of Airport in Vicinity" shall be provided to all prospective purchasers and occupants of the property.	Prior to Occupancy.	Project Applicant.	Provide evidence to RCALUC that the "Notice of Airport in Vicinity" has been provided to prospective purchasers and occupants of the property.	Initials: _____ Date: _____
Mitigation Measure HAZ-5: Electromagnetic Component Notification. March Air Reserve Base shall be notified of any land use having electromagnetic radiation. Sources of electromagnetic radiation include radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers, access gates, etc.	Prior to Occupancy.	Project Applicant.	Provide notification of any land use having electromagnetic radiation to RCALUC.	Initials: _____ Date: _____
HYDROLOGY AND WATER QUALITY				
PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI)	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	Provide evidence of compliance with the NPDES requirement to the City Public Works Department.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.			Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.	
PPP HYD-2: WQMP. Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City's Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	City's Public Works Department approval of WQMP.	Initials: _____ Date: _____
PUBLIC SERVICES				
PPP PS-1: The Project is required to pay school impact fees in accordance with SB 50 at the time of building permit issuance. The school impact fee for commercial/industrial developments within the RUSD boundary is $0.84 per SF, which would equal approximately $167,874 for the Project.	At the time of building permit issuance.	Riverside Unified School District.	Provide evidence to City that the school impact fees have been paid.	Initials: _____ Date: _____
RECREATION				
PPP R-1: Park and Recreation Development Fees. Pursuant to Municipal Code Chapters 16.44, 16.60, and 16.76, park development fees are imposed on the construction or placement of applicable nonresidential construction in accordance with the schedule of fees adopted by the City Council.	Prior to the issuance of a building permit.	City of Riverside Parks and Recreation Department.	Provide evidence to City that the park development fees have been paid.	Initials: _____ Date: _____
TRANSPORTATION				
PDF TRA-1: Chicago Avenue/Massachusetts Avenue Intersection Improvements: The Project would change the intersection control on Chicago Avenue/Massachusetts Avenue intersection to all-way stop (AWSC) control.	Prior to the issuance of Certificate of Occupancy.	City of Riverside Public Works Department – Traffic Division.	City approval of Final Plans.	Initials: _____ Date: _____
PDF TRA-2: Chicago Avenue/3rd Street Intersection Improvements: The Project would implement protected-permissive left-turn phasing for the northbound and southbound left-turn approaches by installing flashing yellow signal head and "Left Turn Yield On Flashing" sign on Chicago Avenue/3rd Street intersection.	Prior to the issuance of Certificate of Occupancy.	City of Riverside Public Works Department – Traffic Division.	City approval of Final Plans.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
TRIBAL CULTURAL RESOURCES				
Mitigation Measure CUL-1: Inadvertent Discovery of Archaeological Resource. As listed in Section *5.5, Cultural Resources*.	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	Halt any work in the event of inadvertent discoveries of archeological resources. Provide evidence to the City that a qualified Archeological has been retained. Submittal of report that documents the finding to the City.	Initials: _____ Date: _____
MM-TCR-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.	Prior to grading permit issuance.	City of Riverside Engineering Division and Building & Safety Division.	Provide copy of consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation Halt any work in the event of inadvertent discoveries of archeological resources.	Initials: _____ Date: _____
MM-TCR-2: Project Archaeologist: Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the	Prior to the issuance of a grading permit.	City of Riverside Building & Safety Division.	Provide a letter to the City from a certified Archaeologist and Paleontologist	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
Archaeologist and Paleontologist shall be on site during all grading and other significant ground-disturbing activities.				
MM-TCR-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries: 1. **Consulting Tribes Notified:** Within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation. 2. **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 will need approval of the consulting tribe(s); and 3. **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 to the consulting tribe(s). The Applicant 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: a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. Upon consultation with the tribe(s) and if parties agree that reburial on project site is not feasible, a curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79, if agreed upon by the tribe(s), and therefore will be professionally curated. The collections and associated records shall be transferred, including title, to an appropriate curation	During ground-disturbing activities.	City of Riverside Community & Economic Development Department and Building & Safety Division.	Provide the City that with evidence of notification to consulting tribes in the event of inadvertent discoveries; a copy of the completed Phase IV Monitoring Report.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and d. 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 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 will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.				
MM-TCR-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.	Prior to start of grading.	City of Riverside Planning Division.	Provide City with sign-in sheet from Cultural Sensitivity Training for all construction personnel and included in the Phase IV Monitoring Report.	Initials: _____ Date: _____
UTILITIES AND SERVICE SYSTEMS				
PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Public Works Department with evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain coverage under the construction general permit from the State Water Resource Control Board (SWRCB). The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	Provide evidence of compliance with the NPDES requirement to the City Public Works Department.	Initials: _____ Date: _____

Mitigation Measure	Implementation Timing	Responsible Party	Verification Method	Date Completed and Initials
a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.			Submit a NOI, develop and submit a SWPPP, and submit a MMRP for the construction site.	
PPP HYD-2: WQMP. Prior to the issuance of any grading permits, a completed Water Quality Management Plan (WQMP) shall be submitted to and approved by the City's Public Works Department. The WQMP shall identify all Post-Construction, Site Design, Source Control, and Treatment Control Best Management Practices (BMPs) that will be incorporated into the development Project in order to minimize the adverse effects on receiving waters.	Prior to issuance of any grading permits.	City of Riverside Public Works Department.	City's Public Works Department approval of WQMP.	Initials: _____ Date: _____