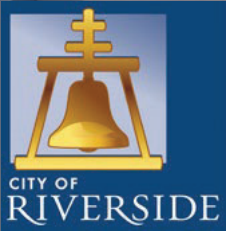


# Draft Environmental Impact Report

Arlington Mixed Use Development Project  
SCH No. 2023060428

Prepared for the Lead Agency  
**City of Riverside**  
3737 Main Street, Suite 400  
Riverside, CA 92501



February 2024



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# Draft Environmental Impact Report SCH# 2023060428

General Plan Amendment, ReZone, Site Plan Review,  
and Certificate of Appropriateness  
PR-2022-001252  
Tentative Parcel Map No. 38638

## *Lead Agency*



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Project Specific Water Quality Management Plan (PSOMAS-C)

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## List of Acronyms

### Acronyms

$\mu\text{g}/\text{m}^3$	Micrograms/cubic meter
AAF	Average Annual Flow
AAM	Annual Arithmetic Mean
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
ADWF	Average Dry Weather Flow
AFY	Acre-feet per year
ALMS	Automatic Load Management System
ALUC	Airport Land Use Commission
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
AYSO	American Youth Soccer Organization
Bcf	Billion cubic feet
BSC	California Building Standards Code
C	Commercial
CAA	Clean Air Act
café	Corporate Average Fuel Economy
CalEPA	California Environmental Protection Agency
CalGreen	California Green Building Standards Code
CalOSHA	California Occupational Safety and Health Administration
Cal Recycle	California Department of Resources Recycling and Recovery
Caltrans	State Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CAPP	Community Air Protection Program
CARB	California Air Resources Board
CAS	Climate Adaptation Strategy
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEHD	Community Economic and Human Development
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CF	Cubic Feet

**Acronyms**

CFC	California Fire Code
CFCs	Chlorofluorocarbons
CG	Commercial General
CH <sub>4</sub>	Methane
CHRIS	California Historical Resource Information System
City	City of Riverside
CIWMP	Countywide Integrated Waste Management Plan
CMA	Congestion Management Agency
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
COA	Certificate of Appropriateness
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
COG	Council of Governments
CPUC	California Public Utilities Commission
CRECs	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
CSD	Community Service Districts
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DCDA	Double Check Detector Assembly
DHS	California Department of Health Services
dB	decibels
dBA	Decibel A (A-weighted sound level)
dBA/DD	Decibel A per each doubling of the distance
DEIR	Draft Environmental Impact Report
DIF	Development Impact Fees
DOE	Department of Energy
DOF	Department of Finance
DOT	United States Department of Transportation
DPM	Diesel Particulate Matter
du/ ac	Dwelling units per acre
DWR	California Department of Water Resources
ED	Emergency Department
EE	Energy Efficient
EIC	Eastern Information Center
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EPA	Environmental Protection Agency
EPCA	The Federal Energy Policy and Conservation Act
ERIS	Environmental Risk Information Services
ESA	Environmental Site Assessment

**Acronyms**

EV	Electric Vehicle
EVCS	Electric Vehicle Charging Station
EVSE	Electrical Vehicle Supply Equipment
F	Fahrenheit
FAR	Floor Area Ration
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEIR	Final Environmental Impact Report
FHWA	Federal Highway Administration
FRA	Federal Railroad Administration
FT	Feet
FTA	Federal Transit Administration
GGE	Billion Gross Gasoline Equivalents
GHG	Greenhouse Gas
GMZ	Groundwater Management Zone
GP 2025	City of Riverside General Plan 2025
GPA	General Plan Amendment
GPM	Gallons Per Minute
GPUJ	City of Riverside Phase I General Plan Update
GPUJ FEIR	City of Riverside Phase I General Plan Update Final Environmental Impact Report
GWP	Global Warming Potential
HAPs	Hazardous Air Pollutants
HC	hydrocarbons
HCD	California Department of Housing and Community Development
HCP	Habitat Conservation Plans
HHWE	Household Hazardous Waste Element
HRECs	Historical Recognized Environmental Conditions
HVLP	High velocity-low pressure
IEBA	Inland Empire Biking Alliance
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel of Climate Change
IS	Initial Study
ISO	Insurance Service Office
ITE	Institute of Transportation Engineers
JPR	Joint Project Review
I-15	Interstate 15
kBTUs	Kilo-British thermal units
KWh	Kilowatt-hours
LCFS	Low Carbon Fuel Standard
LDMF	Local Development Mitigation Fee
L <sub>dn</sub>	Day-Night Average Noise Level
Leq	Equivalent Sound Level
LHMP	Local Hazard Mitigation Plan
LOS	Levels of Service

**Acronyms**

LRSP	Local Roadway Safety Plan
LRTS	Long Range Transportation Study
M	Meter
MARB	March Air Force Base
MC	Municipal Code
MEP	Maximum Extent Practicable
MERV	Minimum Efficiency Reporting Value
MGD	Million Gallons Per Day
million MTCO <sub>2</sub> E	million metric tons of carbon dioxide equivalent
MPH	miles per hour
MPO	Metropolitan Planning Organization
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MSL	Maximum Screening Level
MS4	Municipal Separate Storm Sewer Systems
MU-V	Mixed-Use Village
MW	Megawatt
MWD	Metropolitan Water District
MY	model year
N <sub>2</sub> O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NAS	National Academy of Sciences
NCP	National Contingency Plan
NDFE	Non-Disposal Facility Element
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic and Safety Administration
NO	Nitric Oxide
NO <sub>2</sub>	Nitrogen Dioxide
NOP	Notice of Preparation
NO <sub>x</sub>	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWS	National Weather Service
O <sub>3</sub>	Ozone
OEHHA	Office Environmental Health Hazard Assessment
OPC	California Ocean Protected Council
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OWS	oil/water separator
Pb	Lead
PCE	Tetrachloroethylene
PEV	Plug in-vehicles
PG&E	Pacific Gas and Electric
PM	Atmospheric Particulate Matter



**Acronyms**

PPB	Parts per billion
PPM	Parts per million
PPV	Peak Particle Velocity
PRC	Public Resources Code
PRC Master Plan	Comprehensive Park, Recreation and Community Services Master Plan
PRIMP	Paleontological Resources Impact Mitigation Program
PV	Photovoltaic
PWWF	Peak Wet Weather Flows
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
RCA	Western Riverside County Regional Conservation Agency
RCALUP	Riverside County Airport Land Use Plan
RCFC & WCD	Riverside County Flood Control and Water Conservation District
REC	Recognized Environmental Conditions
RFD	Riverside Fire Department
RHNA	Regional Housing Needs Allocation
RMA LUCP	Riverside Municipal Airport Land Use Compatibility Plan
ROG	Reactive Organic Gases
ROW	right-of-way
RPD	Riverside Police Department
RPL	Riverside Public Library
RPS	Renewable Portfolio Standard
RPU	Riverside Public Utilities
RPW	City's Public Works Department
RSL	Regional Screening Levels
RSHA	Regional System of Highways and Arterials
RTA	Riverside Transit Agency
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUSD	Riverside Unified School District
RWQCB	Regional Water Quality Control Board
RZ	Rezone
RWQCB	California Regional Water Quality Control Board - Santa Ana Region
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas
SCS	Sustainable Communities Strategy
SDG&E	San Diego Gas and Electric
SF	Square Feet
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SKR	Stephens' Kangaroo Rat
SLCP	Short-lived Climate pollutants
SLF	Sacred Lands File
SO <sub>2</sub>	Sulfur Dioxide

**Acronyms**

SRA 23	Sauce Receptor Area 23
SRA	State Responsibility Area
SR-60	California State Route 60
SRRE	Source Reduction and Recycling Element
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
TAC	Technical Advisory Committee
TACs	Toxic air contaminants
TAZ	Traffic Analysis Zone
TCA	Federal Toxic Substances Control Act
TCA	1,1,1,-trichloroethane
T-BACT	Best Available Control Technology For Toxics
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management Regulations
TEA-21	The Transportation Equity Act for the 21 <sup>st</sup> Century
TIA	Traffic Impact Analysis
TNM	Traffic Noise Model
TPA	Transit Priority Area
TPH	Total Petroleum Hydrocarbons
TPM	Tentative Parcel Map
TUMF	Transportation Uniform Mitigation Fee (Western Riverside County)
UC	University of California
USACE	United States Army Corps of Engineers
US DOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	Underground Storage Tanks
UWMP	Urban Water Management Plans
VdB	Vibration decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WMD	Water Management District
WMWD	Western Municipal Water District
WRCOG	Western Riverside Council of Governments
WQMP	Water Quality Management Plan
ZE	Zero Emission
ZEV	Zero Emission Vehicles

## 1.0 Executive Summary

This DEIR is being prepared to analyze the potential environmental effects of the construction and implementation of the proposed Arlington Mixed Use project including all on- and off-site improvements, and associated discretionary actions, including but not limited to City of Riverside project number PR-2022-001252 which includes a General Plan Amendment, Rezone, Site Plan Review, Tentative Parcel Map, and Certificate of Appropriateness, all of which are herein collectively referred to as the “Project.” All figures associated with this section start of page 1.0-12.

### 1.1 Project Location

The City of Riverside (City) is located in the northwestern portion of Riverside County. The City is bounded on the north by the Cities of Jurupa Valley, Colton, and Grand Terrace and the unincorporated community of Highgrove, to the east by the City of Moreno Valley, to the south by the unincorporated community of Woodcrest, and to the west by the Cities of Corona and Norco as reflected in **Figure 1.0-1, Vicinity Map**. The Project site is located within Section 33, Township 2 South and Range 5 West of the San Bernardino Baseline and Meridian, identified on the Riverside West, California USGS 7.5 Quadrangle Map as identified in **Figure 1.0-2, USGS Topographical Map**.

The Project entails, an approximately 17.43 gross acre and 17.37 net acre site (after dedication of 0.05 acres along Arlington Avenue for road right-of-way), located at the northeast corner of Arlington Avenue and Streeter Avenue as depicted in **Figure 1.0-3, Aerial Site Boundary Map**. The Project site consists of assessor parcel number (APN) 226-180-015-1; specifically located at 5261 Arlington Avenue, Riverside CA 92506. Project parcel throughout this document is based upon net acreage of 17.37 acres. The Project also includes approximately 1.5 miles of offsite impacts located within roadway right-of-way as reflected in **Figure 3.0-4, Aerial Site Boundary with Offsites**.

### 1.2 Environmental Setting

The proposed Project consists of an existing fully developed site, amongst an urbanized area and is completely surrounded by existing development. No natural habitats are located on site. Hence, no habitat to support listed or protected species has been identified. The Project site is relatively flat with an average elevation of approximately 787 feet above mean sea level gently sloping to the northwest.

### 1.3 Existing General Plan Land Use and Zoning Designation

The Project site has a General Plan Land Use Designation of C – Commercial and a zoning designation of CG – Commercial General as reflected in **Figure 1.0-5, Existing General Plan Land Use Designation** and **Figure 1.0-6, Existing Zoning Designation**.

#### 1.3.1 Surrounding Land Uses

The area surrounding the Project site is developed and urbanized with a variety of land uses, including commercial, medium-high density residential, high-density residential, office, and public facilities. Refer to **Table 1.0-A, Surrounding Land Uses**, for the existing land usage and general plan land use and zoning designations for the surrounding area.

**Table 1.0-A, Surrounding Land Uses**

<b>Location</b>	<b>Existing Land Usage</b>	<b>General Plan Land Use Designation</b>	<b>Zoning Designation</b>
<b>Project Site</b>	Existing Vacant Sears Department Store and Auto Center	C – Commercial	CG – Commercial-General
<b>North</b>	Residential Uses Office Uses Vacant	O – Office PF – Public Facilities C – Commercial	CG – Commercial General R- 1- 7000 – Single Family Residential
<b>East</b>	Residential Uses Office Uses	MDR – Medium Density Residential O – Office	R- 1- 7000 – Single Family Residential O – Office
<b>South</b> (Across Arlington Avenue and California Avenue)	Commercial and Office Uses	C – Commercial HDR – High Density Residential	CR – Commercial Retail CG – Commercial General O – Office
<b>West</b> (Across Streeter Avenue )	Residential, Office, and Commercial Uses	MDR – Medium Density Residential O – Office C – Commercial PF – Public Facilities	CG – Commercial General O – Office R- 1- 7000 – Single Family Residential

### 1.3.2 Airport Land Use

The Project site is located within the *Riverside County Airport Municipal Airport Land Use Compatibility Plan (RCALUCP)* and is approximately one mile from the airport runway (GE); specifically the Riverside Municipal Airport (RMA). A majority of the Project site is located within the RMA Land Use Compatibility Zone B1 with smaller portions located with Zones C and D as shown in **Figure 3.0-7, Riverside Municipal Airport Land Use Compatibility Zones**. The proposed Project is required to be reviewed by the Airport Land Use Commission for its consistency with the RCALUCP. (RCALUCP). On January 12, 2023, ALUC determined the Project to be inconsistent with the RCALUCP.

## 1.4 Project Characteristics

### 1.4.1 Project Land Use Applications

The proposed Project includes the following entitlement applications for consideration by the City of Riverside:

- General Plan Amendment (GPA): Proposes to amend the general plan land use designation from C – Commercial to MU-V – Mixed Use-Village as per **Figure 1.0-8, Proposed General Plan Land Use**.

- Rezone (RZ): Proposes to rezone the site from CG – Commercial General to MU- V – Mixed Use-Village as per **Figure 1.0-9, Proposed Zoning**.
- Site Plan Review (PPE): Proposes to develop the 17.37 net acre site with a 576,203 square foot (sf) mixed-use apartment community. Proposal includes development of 27 residential apartment buildings consisting of 2- and 3-story structures that would provide for a total of 388 residential dwelling units, one clubhouse building, and two commercial buildings providing for 546,474 sf of residential use and 4,409 sf associated clubhouse/leasing building, and 25,320 sf of commercial-retail use as per **Figure 1.0-10, Proposed Site Plan**.
- Tentative Parcel Map No. 38638(TPM): Proposes to subdivide the 17.37 net acre site into 2 parcels for financing, conveyance, and phasing purposes. Parcel 1 will consist of 14.44 net acres for residential development and Parcel 2 will consist of 2.93 net acres for commercial-retail development as per **Figure 1.0-11, Tentative Parcel Map**.
- Certificate of Appropriateness (COA): Proposal to demolish the existing vacant Sears structures. The Sears structures were built in 1964 and have been deemed eligible for listing in the California Register of Historic Resources under Criterion 3, National Register for Historic Places, and the City of Riverside Historical Landmarks.

## 1.4.2 Existing Site Conditions

The existing Project site includes two existing vacant commercial buildings located on the 17.37 net acre parcel that are associated with the former Sears Department Store and Automotive Service Center constructed in the mid 1960's<sup>1</sup> as shown in **Figure 1.0-12, Existing Site Conditions**. These structures are eligible for listing in the National Register for Historic Places, California Register for Historic Resources, and the City of Riverside Historical Landmarks.

The former department store was located in the central building, now a vacant structure. The interior of the vacant department store building includes retail areas, warehouse and supply storage areas, sub-grade basement areas, public and freight hydraulic elevators, and restrooms. The basement area contains a disconnected boiler, trash compactor, and emergency generator. A smaller automotive service center structure is located on the western portion of the property. This building includes six bay doors opening to a concrete-paved former service area with secondary containment structures, nine hydraulic hoists, and a sub-grade oil/water separator. (WEIS-A, p. 4).

The site formerly contained a vehicle fueling island with three 10,000-gallon gasoline USTs which were removed in 1985 and seven 1,000 to 2,000-gallon oil and waste oil USTs removed in 1987; the fueling station island and distribution lines were removed in 1994. The balance of the remaining site property comprises asphalt-paved parking areas, driveways, and minor landscaping. (WEIS-A, p. 4).

The existing site provides six access points: two along Arlington Avenue and four along Streeter Avenue. Access from Arlington Avenue consists of two full-access driveways leading to a surface parking area containing cement planters for the ornamental trees, a 3-foot cinder block wall (also referred to as Concrete masonry unit wall [CMU wall]) along site frontage and light poles for security lighting. The eastern portion of the site is composed of a surface parking area with ornamental trees and security lighting. The eastern boundary abuts existing residential development where a 6-foot block wall divides the site from the neighboring properties. Access from Streeter Avenue consists of two full-access driveways, leading to the existing Auto Center area, Sears building loading dock, and includes additional surface parking with ornamental trees and security lighting. The northern boundary abuts existing

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1. Per Cultural Resource Technical Assessment prepared by Dudek dated March 2023 (DUDEK-A).

residential development, commercial offices, and a vacant parcel where a 6-foot block wall divides the site from neighboring properties.

The Project site has remained vacant since February 2020, when Sears ceased operations. Occasionally, the vacant structure is utilized for the seasonal store “Spirit Halloween.” (PE) and the site’s parking lot was briefly used in 2020 as a COVID drive-thru testing site. Currently, the Project site surface parking area along the southeast corner has been used by the Riverside Certified Farmers Markets every Friday morning (RUHS). After the site ceased to be utilized as a COVID thru testing site, the Sears building was burglarized and vandalized. Building systems that have been removed/stolen or damaged is rampant throughout the interior of the building. Hence, the building is no longer operational in its present condition. Since this incident, the Project site has been under 24-hour security.

### 1.4.3 Proposed Project

#### Demolition

The proposed Project would include the demolition of the existing vacant 192,139 sf former Sears buildings and all appurtenances per **Figure 1.0-13, Demolition Plan**. Sears Auto Center is a 13,713 sf structure. The 178,426 sf Sears structure consists of a 90,526 sf basement and 87,900 sf ground level. A 6-foot high protection fence with windscreen material will be installed around the site during demolition to obscure views of the site. The Project will use crushed concrete and asphaltic concrete from the Project site as engineered fill material in accordance with recommendations from the Geotechnical Reports.

#### Project Attributes

The Project proposes development of approximately 576,203 sf of residential and commercial-retail uses as reflected in **Figure 1.0-10** and **Table 1.0-B, Building Square Footage Summary**. The Project will include several amenities including: onsite leasing office, tuck-under garages, carports, public dog park, outdoor resort style pool and spa, fitness area, clubhouse, shade structures with barbeques and tables, multi-use turf areas, outdoor gaming and play spaces. The project also proposes a variety of rooftop and carport solar panels with a fixed tilt of 10 degrees with no rotation, and an orientation of 90 degrees.

**Table 1.0-B, Building Square Footage Summary**

Building Type	Building No.	Dwelling Units	Square Footage
<b>Residential</b>			
Garden Style	1	30	39,805
Garden Style	2	30	39,805
Garden Style	3	18	21,000
Garden Style	4	20	25,339
Garden Style	5	20	25,339
Garden Style	6	20	25,339
Garden Style	7	20	25,339
Garden Style	8	20	25,339
Garden Style	9	20	25,339



**Table 1.0-B, Building Square Footage Summary**

<b>Building Type</b>	<b>Building No.</b>	<b>Dwelling Units</b>	<b>Square Footage</b>
Garden Style	10	30	39,805
Garden Style	11	30	39,805
Garden Style	12	30	39,805
Garden Style	13	30	39,805
2-Story Townhome	14	5	9,615
2-Story Townhome	15	5	9,615
2-Story Townhome	16	5	9,615
2-Story Townhome	17	5	9,615
2-Story Townhome	18	5	9,615
2-Story Townhome	19	5	9,615
2-Story Townhome	20	5	9,615
2-Story Townhome	21	5	9,615
2-Story Townhome	22	5	9,615
2-Story Townhome	23	5	9,615
2-Story Townhome	24	5	9,615
2-Story Townhome	25	5	9,615
2-Story Townhome	26	5	9,615
2-Story Townhome	27	5	9,615
<b>Residential Subtotal</b>		<b>388</b>	<b>546,474</b>
Clubhouse/Fitness/Leasing	N/A		4,409
<b>Commercial</b>			
Grocery	N/A	N/A	20,320
Retail	N/A	N/A	5,000
<b>Commercial Subtotal</b>		N/A	<b>25,320</b>
<b>TOTALS</b>		<b>388</b>	<b>576,203</b>

*Residential*

The residential component of the proposed Project includes development of 27 residential buildings providing for 546,474 sf of residential use and one 4,409 sf Clubhouse/Fitness/Leasing building. The Clubhouse/Fitness/Leasing building will be publicly accessible while the residential portion will be accessible via gates. The residential buildings will allow for a total of 388 dwelling units and be divided between 13 3-story garden style buildings providing for 318 dwelling units and 14 2-story townhome buildings providing for 70 dwelling units. The unit mix will be comprised of 18 studio units, 152 one-bedroom units, 28 two-bedroom units, and 42 three-bedroom units. As reflected in **Figure 1.0-10**, buildings 1-13 would be 3-Story garden style residential structures. Buildings 14-27 would be 2-Story

townhomes. The 3-Story garden style buildings would introduce 318 residential units, while the 2-Story townhomes would introduce 70 residential units. The 3-Story Garden Style residential buildings will offer varying exterior styles. Proposed residential elevations and floor plans are reflected in the following figures:

- **Figure 1.0-14, Proposed Elevations [Garden Style-Type III Front & Left]**
- **Figure 1.0-15, Proposed Elevations [Garden Style-Type III-Rear & Right]**
- **Figure 1.0-16, Proposed Elevations [Townhomes]**
- **Figure 1.0-17, Proposed Floor Plans [Garden Style Plans 1 of 2]**
- **Figure 1.0-18, Proposed Floor Plans [Garden Style Plans 2 of 2]**
- **Figure 1.0-19, Proposed Floor Plans [Townhome Plans]**

These exterior styles will contain a similar color palette to unify the buildings throughout the Project site. The residential area will also provide a 4,036 sf dog park, pedestrian promenade, picnic, and play areas. The dog park will be accessible through a gate on the residential side and accessible to the public via a gate in the commercial area.

### *Commercial-Retail*

The proposed Project will provide 25,320 sf of commercial-retail use by way of two commercial-retail buildings in the southeastern portion of the site along Arlington Avenue. A 5,000 square feet (sq. ft.) multi-tenant retail speculative pad would be located in the southwestern corner of the project site with an adjoining outdoor dining/flex space that could include a 24-hour operation. This area of the site also proposes a 20,320 sq. ft. grocery store pad as reflected in **Figure 1.0-20, Proposed Elevations ALDI Right & Rear** and **Figure 1.0-21, Proposed Elevations ALDI Left & Front**. The Project is projected to have up to 51 employees.<sup>2</sup>

The proposed grocery store is expected to operate between the hours of 9am and 9pm seven days a week. The store is estimated to include approximately 20 employees; scheduling 3 to 7 employees per shift. Store deliveries are expected to take place once per day, by a WB67 truck from the Moreno Valley warehouse located southwest of Redlands Boulevard and State Route 60. There will also be limited small truck deliveries for beverages and bakery items.

### **Parking**

As shown in **Figure 1.0-22, Proposed Parking Plan**, the Project will provide parking areas for residential occupants, residential guests, and commercial-retail users. The plan provides for a total of 815 parking spaces across the entirety of the site. A total of 683 parking spaces will be dedicated to residential uses and includes 594 standard stalls, 20 Americans with Disability Act (ADA) accessible stalls, 66 electric vehicle charging station (EVCS) stalls, and 3 ADA/EVCS stalls. A total of 132 parking stalls will be dedicated to commercial-retail uses which includes 111 standard stalls, 7 ADA accessible stalls, 12 EVSC stalls, and 2 ADA/EVCS stalls. Additionally, the site will provide 41 stalls for bicycle parking.

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2. Source: County of Riverside General Plan Appendix E-2: Socioeconomic Buildout Assumptions and Methodology, Table E-5: Commercial Employment Factors, pg 3, dated April 11, 2017, available at [https://planning.rctima.org/Portals/14/genplan/general\\_Plan\\_2017/appendices/Appendix%20E-2\\_April%202017.pdf?ver=2017-10-23-153612-743](https://planning.rctima.org/Portals/14/genplan/general_Plan_2017/appendices/Appendix%20E-2_April%202017.pdf?ver=2017-10-23-153612-743), accessed November 14, 2022.  
Based on employee generation rate of 500 square feet per employee of commercial retail (25,320 sf ÷ 500 sf/employee = 51 employees).

## Open Space

The Project will include open space throughout the proposed development. Specifically, within the private residential areas per City requirements, the Project should provide 19,400 square feet of open space and the public/common areas should also provide 19,400 square feet of open space. The Project will include 36,502 sf of private open space associated with each of the residential building areas, as well as 57,071 sf in the public/common areas. The public common open space includes areas such as the dog park, pool, and clubhouse. There are 72 existing ornamental, non-native trees located throughout the site. The Project will remove these trees and instead provide a landscape plant palette consistent with *Riverside Citywide Design Guidelines for Water Efficient Landscape and Irrigation Design Guidelines*, amended January 2019 (RCDG-A) as well as plants consistent with the Riverside County Airport Land Use Commissions *Landscaping Near Airports: Special Considerations for Preventing or Reducing Wildlife Hazards to Aircraft* (ALUC-A) as reflected in the following figures:

- **Figure 1.0-23, Conceptual Landscape Plan**
- **Figure 1.0-24, Landscape Planting Plan**
- **Figure 1.0-25, Plant Palette [1 of 2]**
- **Figure 1.0-26, Plant Palette [2 of 2]**

The residential portion of the Project site will be surrounded by a 6 foot high tubular steel fence, 6 foot high block wall, or combination block wall/steel fence as reflected in **Figure 1.0-27, Wall and Fence Plan**. The Project includes details for walls and fences within the site and around the perimeter of the site as well as sign plans, fountain wall, dog park gates, vehicular gates, and access gates for residential access as reflected in **Figure 1.0-28, Wall and Fences Details [1 of 2]** and **Figure 1.0-29, Wall and Fence Details [2 of 2]**.

## Lighting

The proposed Project will include exterior building lights and pedestrian lighting for safety and security purposes within parking lots, along pathways, and on buildings as identified in **Figure 1.0-30, Proposed Lighting Plan**. All light sources will be shielded so that the light is directed away from streets and adjoining properties. Further, all light fixtures will be required to be consistent with the City of Riverside Municipal Code – Title 19, Zoning Code for illumination. Existing streetlights are located along Streeter Avenue and Arlington Avenue within the right-of-way.

## Construction

Construction is anticipated to take approximately 23 months and will be built in two phases with the first phase being commercial parcel, and the second phase being the residential parcel as reflected in **Table 1.0-C, Phase 1 Estimated Construction Schedule** and **Table 1.0-D, Phase 2 Estimated Construction Schedule**, below. Grading of the Project site will include 18,376 cubic yards (CY) of cut and 18,127 CY of fill. This activity results in a net export of approximately 249 CY. When import or export is within 2 percent of the overall grading values, a site is considered to be balanced. Since export will be less than 2 percent of the overall grading value of the Project, the site is considered to be balanced. Construction is anticipated to commence July 2024 and be completed in 2026.

**Table 1.0-C, Phase 1 Estimated Construction Schedule**

Construction Activity	Start Date	End Date	Total Working Days
Demolition	July 1, 2024	July 26, 2024	20
Grading	July 29, 2024	August 9, 2024	10

Building Construction	August 12, 2024	June 27, 2025	230
Paving	June 9, 2025	June 27, 2025	15
Architectural Coating	June 9, 2025	June 27, 2025	15

**Table 1.0-D, Phase 2 Estimated Construction Schedule**

Construction Activity	Start Date	End Date	Total Working Days
Grading	January 1, 2025	January 28, 2025	20
Building Construction	January 29, 2025	May 26, 2026	345
Architectural Coating	December 3, 2025	May 26, 2026	125
Paving	January 29, 2025	March 25, 2025	40

Grading would be accomplished with scrapers, motor graders, water trucks, dozers, and compaction equipment. It is anticipated Building materials would be off-loaded and installed using small cranes, boom trucks, forklifts, rubber-tired loaders, rubber-tired backhoes, and other small- to medium-sized construction equipment as needed.

#### 1.4.4 Vehicular Circulation and Site Access

Regional access to the Project Site is provided via State Route 91 (SR-91) from Madison Avenue ramps located approximately 0.8 miles to the south, as well as Arlington Avenue ramps located 1.5 miles to the south. Local access is provided via Arlington Avenue and Streeter Avenue. Arlington Avenue is currently constructed to its ultimate half-section width as an arterial along the Project’s frontage from the Project’s western boundary to the Project’s eastern boundary. Specifically, Arlington Avenue is classified as a 120 feet (ft) arterial street with 6 lanes east of Streeter Avenue and an 88 ft arterial street with 4 lanes west of Streeter Avenue. Also, Streeter Avenue is currently constructed to its ultimate half-section width as an 88 ft arterial along the Project’s frontage from the Project’s southern boundary to the Project’s northern boundary.

The proposed Project site will leave in place four of the six existing full access driveways: two along Arlington Avenue and two along Streeter Avenue. Primary site access for the residential area will be from Streeter Avenue with secondary access from Arlington Avenue. The existing driveway will be enhanced by the addition of decorative pavement and an art installation. Primary access for the commercial area will be from Arlington Avenue with secondary access from Streeter Avenue. The following lists the proposed improvements and is reflected in **Figure 1.0-31, Proposed Transportation Improvements:**

##### Driveway and Roadways

- Driveway #1 - Streeter Avenue and Granada Avenue Intersection
  - Install a stop control on the westbound approach (the Project driveway) and construct a westbound shared left-through-right turn lane.
- Driveway #2 - Streeter Avenue and El Molino Avenue Intersection
  - Install a stop control on the westbound approach (the Project driveway) and construct a westbound shared left-through-right turn lane.
- Driveway #3 - California Avenue and Arlington Avenue Intersection
  - Install a stop control on the southbound approach (the Project driveway), construct a southbound right turn lane and construct a westbound right turn lane.
- Driveway #4 - Along Arlington Avenue

- Construct a shared left-through-right turn lane on the southbound approach (the Project driveway), construct a westbound right turn lane, improve the existing traffic signal infrastructure with Audible Push Buttons, install a new traffic signal pole on the north leg, widen Project driveway (north leg of intersection), relocate the existing traffic signal pole located on the north leg to accommodate new drive aisle width and sidewalk/curb-and-gutter locations, and modify existing raised median to provide 150-foot eastbound left turn pocket.
- Streeter Avenue and Arlington Avenue Intersection
  - Improve the existing traffic signal infrastructure with Audible Push Buttons, cut back medians on the north, east and west legs to allow for a clear travel path for pedestrians at all approaches and purchase a new traffic signal controller for this intersection.
- Streeter Avenue from southern Project boundary to northern Project boundary
  - Improve curb and gutter, sidewalk, and landscaping as necessary for site access and consistent with City standards.
- Arlington Avenue from western Project boundary to eastern Project boundary
  - Dedicate 5-feet of pavement from the existing curb-and gutter (60-feet from centerline to edge of ROW) on Arlington Avenue and improve curb and gutter, sidewalk, and landscaping as necessary for site access and consistent with City standards.
- California Avenue, Streeter Avenue, and Arlington Avenue
  - Modify the traffic signal to implement a 130-second cycle.

### ***Bikeways***

- Streeter Avenue
  - From Central Avenue to Arlington – stripe a Class II bike lane.
  - Streeter Avenue/Granada Avenue Intersection – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.
  - Streeter Avenue/Sierra Street South – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.
  - Streeter Avenue/Sierra Street North – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.

Visitor parking will be provided within the entry plaza prior to entering the residential area and several areas throughout the residential portion for residential guests. The residential portion of the Project site will be gated. Primary access to the residential portion of the site will be acquired from Streeter Avenue via two access gates along both sides of the entry driveway. A second and third access gate will be provided from the commercial area. The internal road network is designed to be at least 20 feet wide to allow for emergency vehicle access. The driveway north of the existing Bank of America on Streeter Avenue will serve as egress for future residents and as an emergency access. All entrances and exits will be gate controlled.

### **Public Transit**

The Riverside Transit Agency (RTA) currently serves the Project area. Route 12 travels along Streeter Avenue while Route 15 travels along Arlington Avenue in the Project area. The nearest bus stops and shelters are located on Arlington Avenue and Streeter Avenue. The bus shelter along Arlington Avenue is situated in front of the location of the proposed ALDI. The City will replace the shelter once Arlington Avenue has been widened.

### **1.4.5 Pedestrian Circulation, Bike Lanes and Site Access**

As shown in **Figure 1.0-32, Pedestrian Circulation**, the Project will provide several pedestrian pathways to facilitate the movement of pedestrians within the site. These pathways will be lit to ensure security. The Project site will also provide pedestrian linkage to the surrounding area by providing connection to the existing sidewalks along Streeter Avenue and Arlington Avenue. Additionally, the Project will stripe a Class II bike lane along Streeter Avenue, from Central Avenue to Arlington Avenue.

### **1.4.6 Infrastructure and Utilities**

As the Project is an existing developed site with existing vacant structures, utilities are provided within and around the site. Several of the existing utility facilities on-site will be removed and replaced or relocated as reflected in **Figure 1.0-33, Existing and Proposed Utility Plan**, to provide connection to existing facilities within the rights-of-way.

#### **Water**

Public water service for both potable and non-potable/recycled water would be provided by RPU. There is an existing 8-inch water line exists in Streeter Avenue, and an existing 12-inch line in Arlington Avenue. Project will connect to the existing lines in both Streeter and Arlington via 10-inch meter and backflow devices.

#### **Sewer**

Wastewater treatment for the project would be provided by the City Public Works Department at the Riverside Regional Water Quality Control Plant. The proposed project would connect to an existing 8-inch sewer line located on Streeter Avenue and 21-inch sewer line in Arlington Avenue through 8-inch sewer laterals.

#### **Stormwater Facilities**

The proposed Project site will be paved and landscaped throughout. The proposed Project will relocate existing on-site storm drain system and provide new on-site drainage and be designed to incorporate catch basins and biotreatment BMPs and landscaping features to redirect, capture, and treat surface runoff from new development prior to entering the existing storm drain system through connection to the existing 30-inch and 33-inch lines in Streeter Avenue as reflected on **Figure 1.0-34, Proposed Drainage & Grading Plan**.

#### **Electricity**

RPU provides electrical services to the Project site. All electrical facilities would connect to existing connections in Arlington Avenue and Streeter Avenue. There are existing power poles located along Arlington Avenue located within the right-of-way. An additional circuit will be required to meet the Project's estimated electric demand. This will require approximately 1.5 miles of offsite trenching to connect to existing RPU electric facilities. Trenching will occur within existing ROW and will include approximately 0.5 miles in Streeter Avenue from Arlington Avenue to Central Avenue; approximately 0.5 miles in Central Avenue from Streeter Avenue to Hillside Avenue; and approximately 0.5 miles in Hillside Avenue from Central Avenue to Mountain View Avenue. It is anticipated that trenching may be as deep as 7 to 8 feet below ground. There is some existing conduit and vaults within this alignment. The Project will be required to provide areas of new 6.5-inch conduit and approximately 10 electric vaults sized at 8 feet by 14 feet in order to provide the additional circuit and connect to existing facilities. RPU staff reviewed the proposed project and with the addition of the offsite extensions adequate electrical



facilities exist to serve the Project. With these improvements, RPU has sufficient capacity to serve the Project site.

## **Natural Gas**

Southern California Gas provides natural gas service to the Project site. Existing lines exist in both Arlington and Streeter Avenues to which the project will connect. A 30-inch transmission line also exists in Arlington Avenue. Transmission lines are generally large diameter pipelines that operate at pressures above 200 psi and transport gas from supply points to the gas distribution system.

### **1.4.7 School District**

The Riverside Unified School District will serve the Project site. The project will be responsible for impact fees assessed by the school district.

### **1.4.8 Off-Site Improvements**

All offsite improvements are related to electric facilities and associated roadway improvements described in Section 1.4.4 above. The offsite area encompasses approximately 13 acres. A small 0.15 acres portion of this offsite improvement area is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Criteria Cell number 621, Subunit 1 – Santa Ana River South as reflected in **Figure 1.0-35, Offsite Biological Resources**.

### **1.4.9 Project Objectives**

Per Section 15124 (b) of the CEQA Guidelines, an EIR needs to include a statement of the objectives of a project which will help the City develop a reasonable range of alternatives. The Objectives need to outline the general purpose of the Project and are as follows:

1. Primarily, provide quality, multi-family housing on an existing underutilized site, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers, as well as the City's overarching self-prescribed housing unit numbers.
2. Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.
3. Place housing near existing commercial uses to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.
4. Provide compatible mixed-use development contributing to the character of the surrounding neighborhood.
5. Establish a mixed-use development that will provide a land use transition between the existing commercial Hardman Center and the residential developments surrounding the project site.

## **1.5 Discretionary Actions and Approvals**

The Draft EIR serves as an informational document for use by public agencies, the public, and decision makers. This Draft EIR discusses the impacts of development pursuant to the proposed Project and related components and analyzes Project alternatives. This Draft EIR will be used by the City of Riverside and responsible agencies in assessing impacts of the proposed Project. The following approvals and permits are required from the City of Riverside to implement the proposed Project:



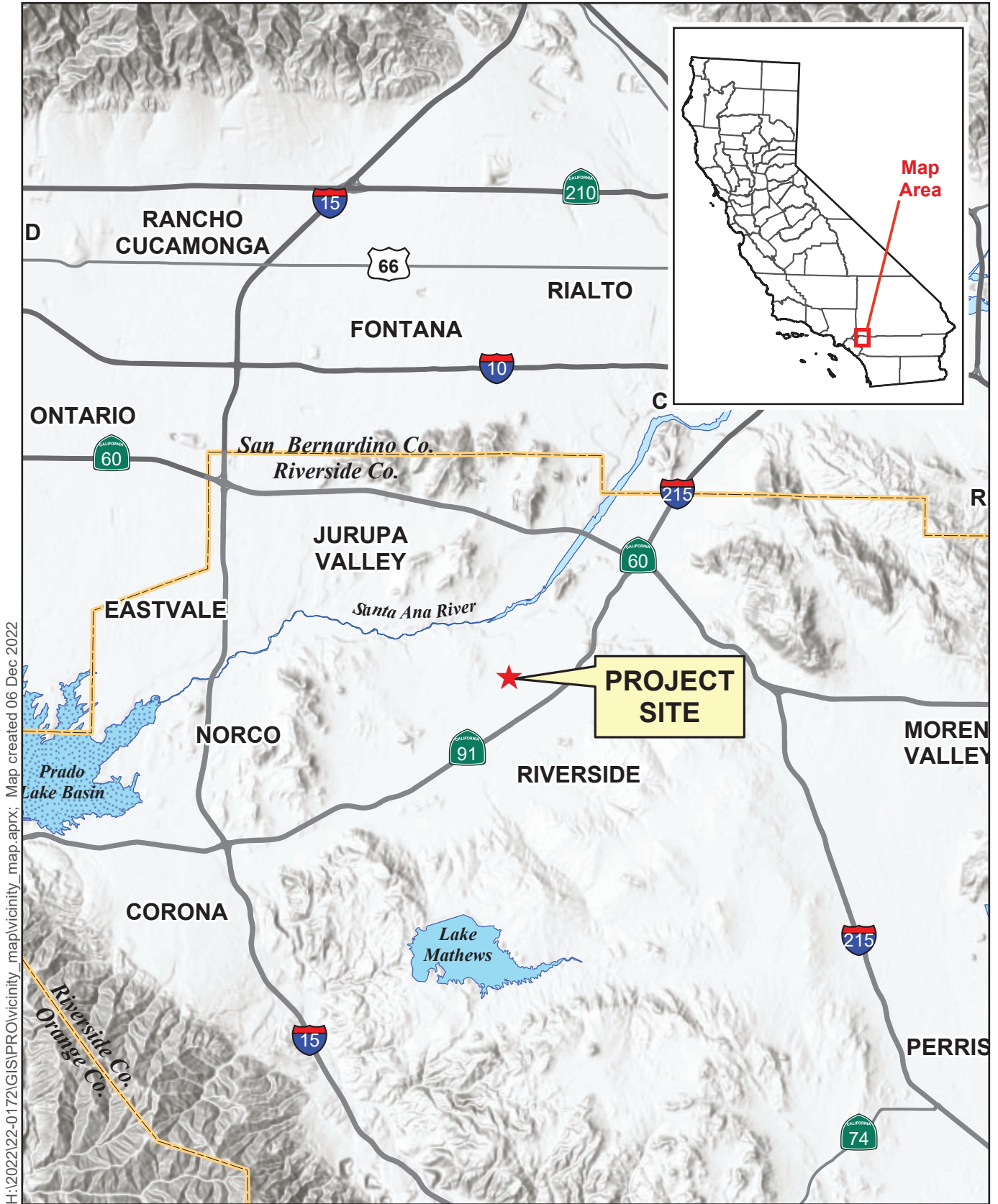
- General Plan Amendment (GPA) - to amend the existing General Plan Land Use designation of Commercial to Mixed-Use Village;
- Rezone (RZ) - to change the current zoning designation of Commercial General to Mixed-Use Village;
- Site Plan Review - for an approximately 576,203 square foot mixed use development including 388 dwelling units on approximately 17.37 net acres.
- Tentative Parcel Map (TPM) - to subdivide 17.37 net acre site into 2 parcels for financing, conveyance, and phasing purposes; and
- Certificate of Appropriateness (COA) - to demolish the existing vacant Sears structures, which have been found to be eligible for listing as a historical resource.
- Certification of the EIR - with the determination that the EIR has been prepared in compliance with the requirements of CEQA.

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the proposed Project include:

- Review and approval of all infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review all on-site plans, including grading and on-site utilities; and
- Approval of a preliminary Water Quality Management Plan (WQMP) to mitigate post-construction runoff flows.

Approvals and permits that may be required by other agencies include:

- Santa Ana Regional Water Quality Control Board (RWQCB) - A NPDES permit from the to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened
- Riverside County Airport Land Use Commission (ALUC) - Consistency Determination
- Western Riverside County Regional Conservation Authority – Joint Project Review Determination

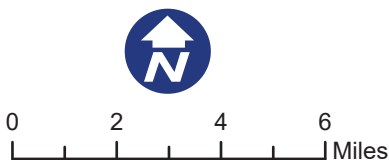


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Source: Riverside County GIS, 2020.

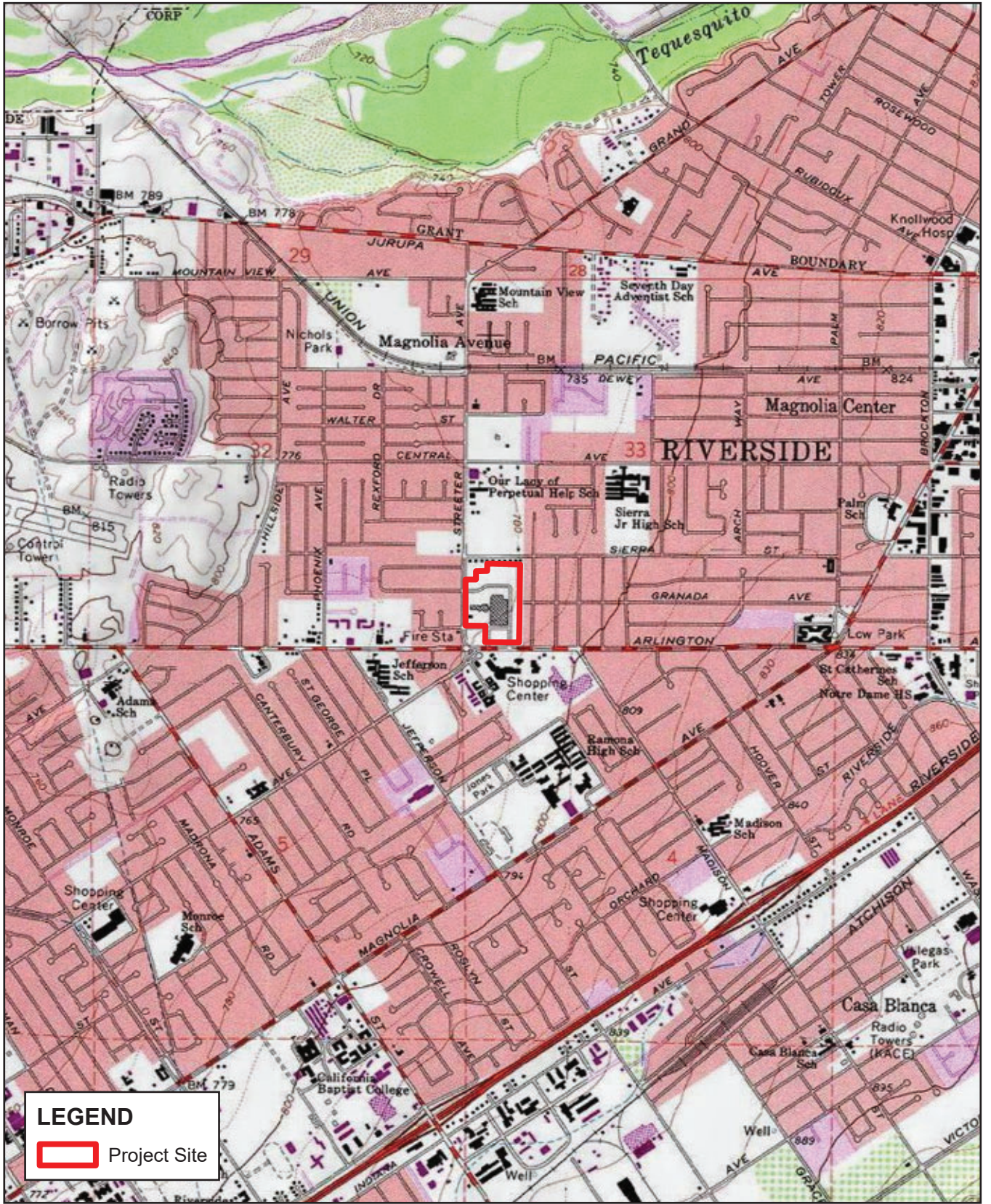
**Figure 1.0-1 Vicinity Map**

Arlington Mixed Use






H:\2022\22-0172\GIS\PRO\usgs\_topo\_map.aprx; Map created 06 Dec 2022; virginia.w



**LEGEND**

 Project Site

Sources: ESRI / USGS 7.5min Quads:  
RIVERSIDE WEST



0 1,000 2,000 3,000  
|-----|-----|-----|  
Feet


**Figure 1.0-2 USGS Topographic Map**  
Arlington Mixed Use



F:\2022\22-0172\GIS\PRO\Aerial\_boundary\Aerial\_boundary.aprx; Map created 20 Jun 2023



**LEGEND**

 Project Site

Sources: Riverside Co. GIS, 2020 (streets) and 2020 (imagery).

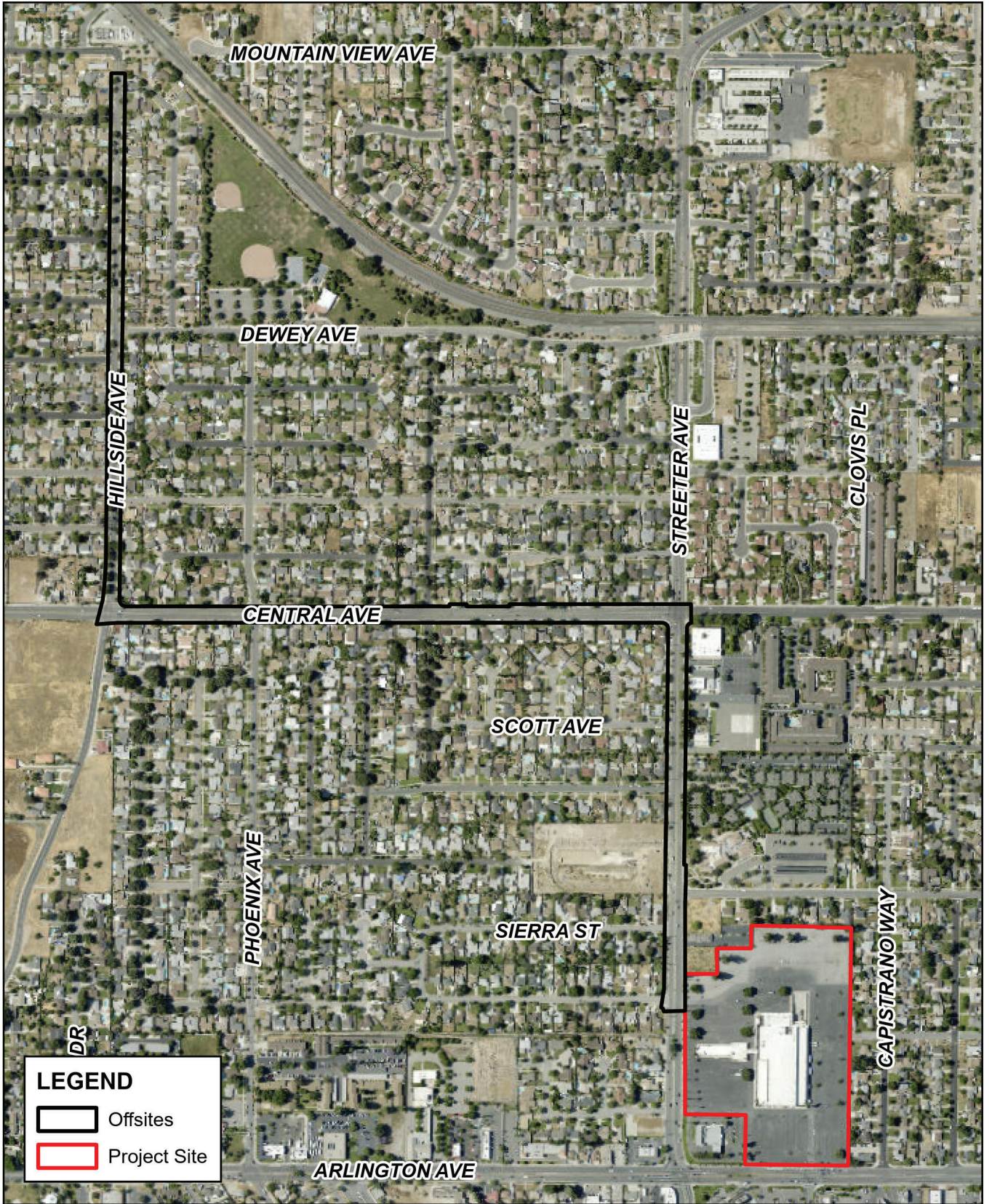


0 100 200 300 Feet

**Figure 1.0-3 Aerial Site Boundary Map**  
Arlington Mixed Use



H:\2022\22-0172\GIS\PRO\airial\_site\_and\_offsites.aprx; Map created 20 Jun 2023



Sources: Riverside Co. GIS, 2020 (streets) and 2020 (imagery).

**Figure 1.0-4 Aerial Site Boundary with Offsites**

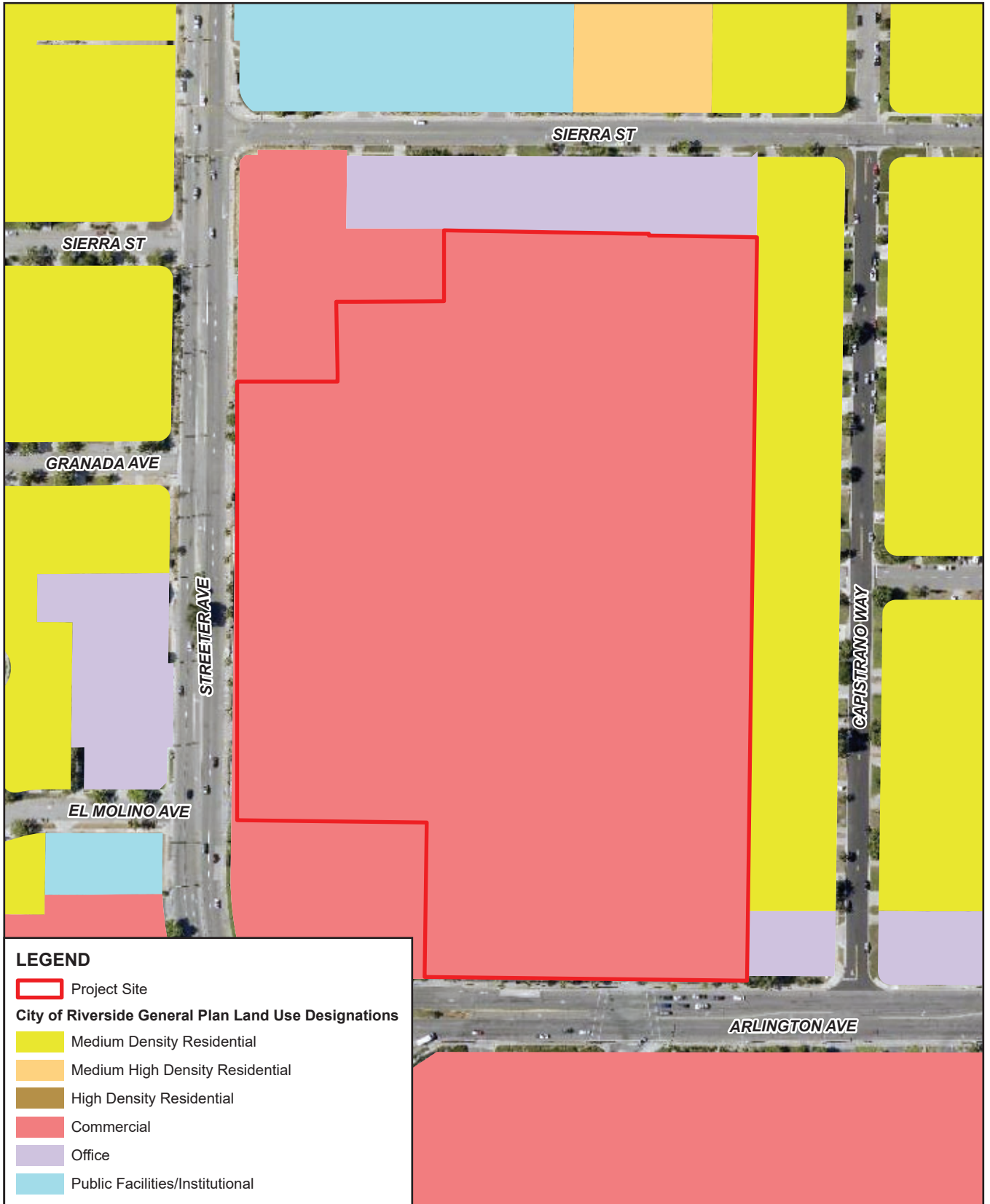
Arlington Mixed Use



0 500 1,000 1,500 Feet



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Sources: Riverside Co. GIS, 2020;  
City of Riverside General Plan Land Use, 2021.

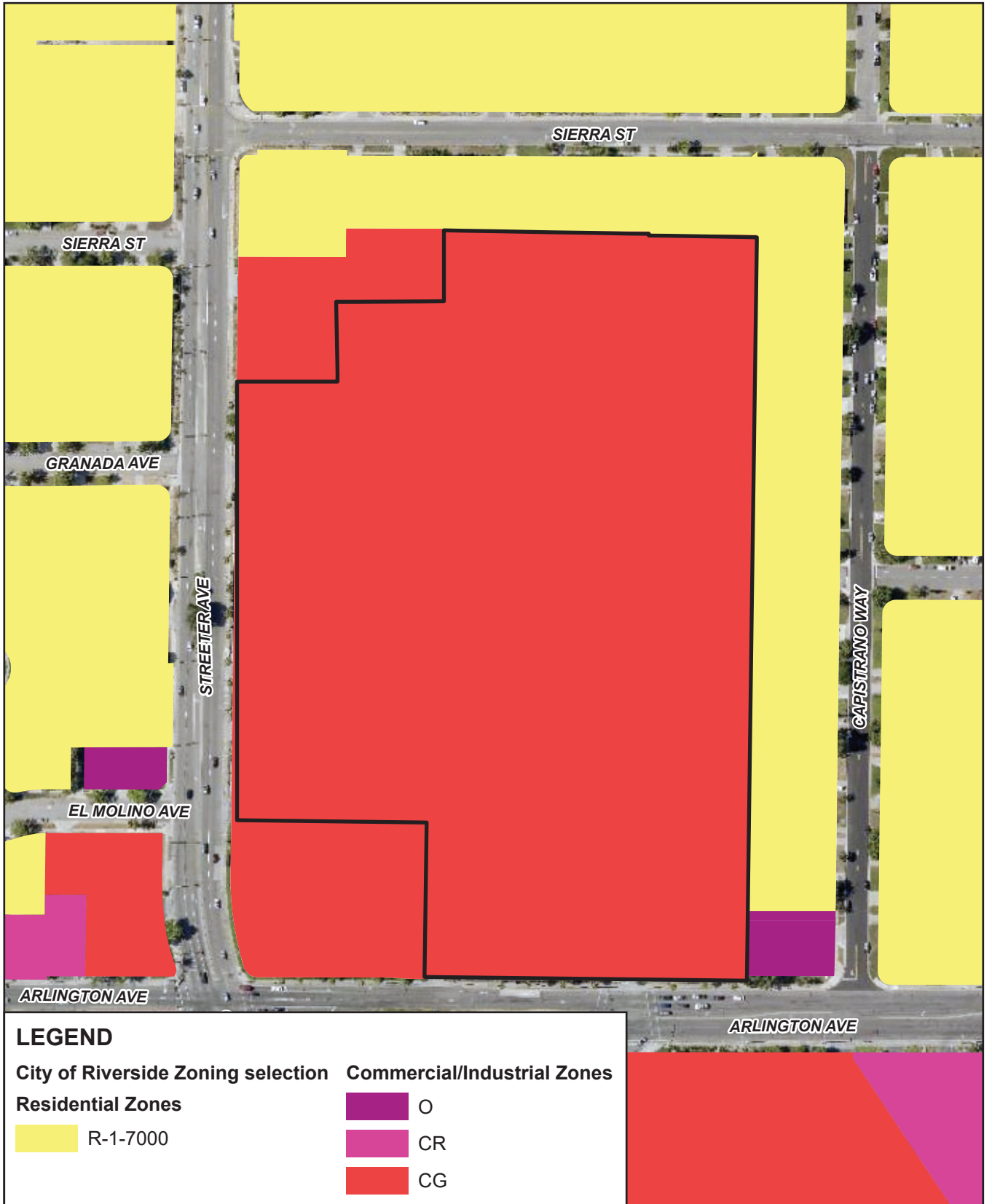
### Figure 1.0-5 Existing General Plan Land Use Designation

Arlington Mixed Use



0 150 300 450 Feet

Fi:\2022\22-0172\GIS\PRO\zoning.aprx; Map created 06 Dec 2022



Sources: Riverside Co. GIS, 2020;  
City of Riverside General Plan  
Land Use, 2021.

**Figure 1.0-6 Existing Zoning Designation**

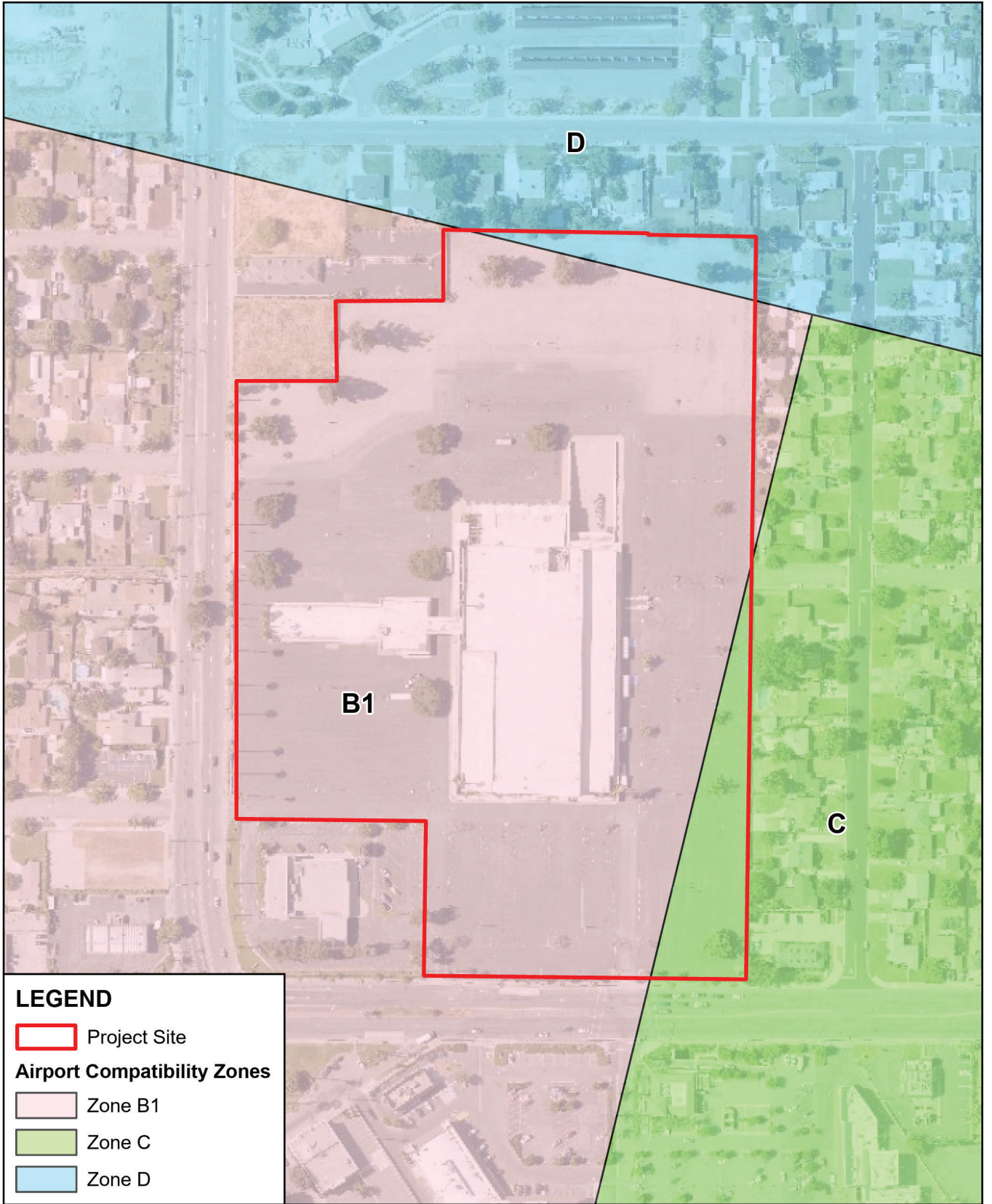
Arlington Mixed Use



0 150 300 450 Feet



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**LEGEND**

- Project Site
- Airport Compatibility Zones**
- Zone B1
- Zone C
- Zone D

Sources: Riverside Co. GIS, 2020; Airport Compatibility Zones, 2022.

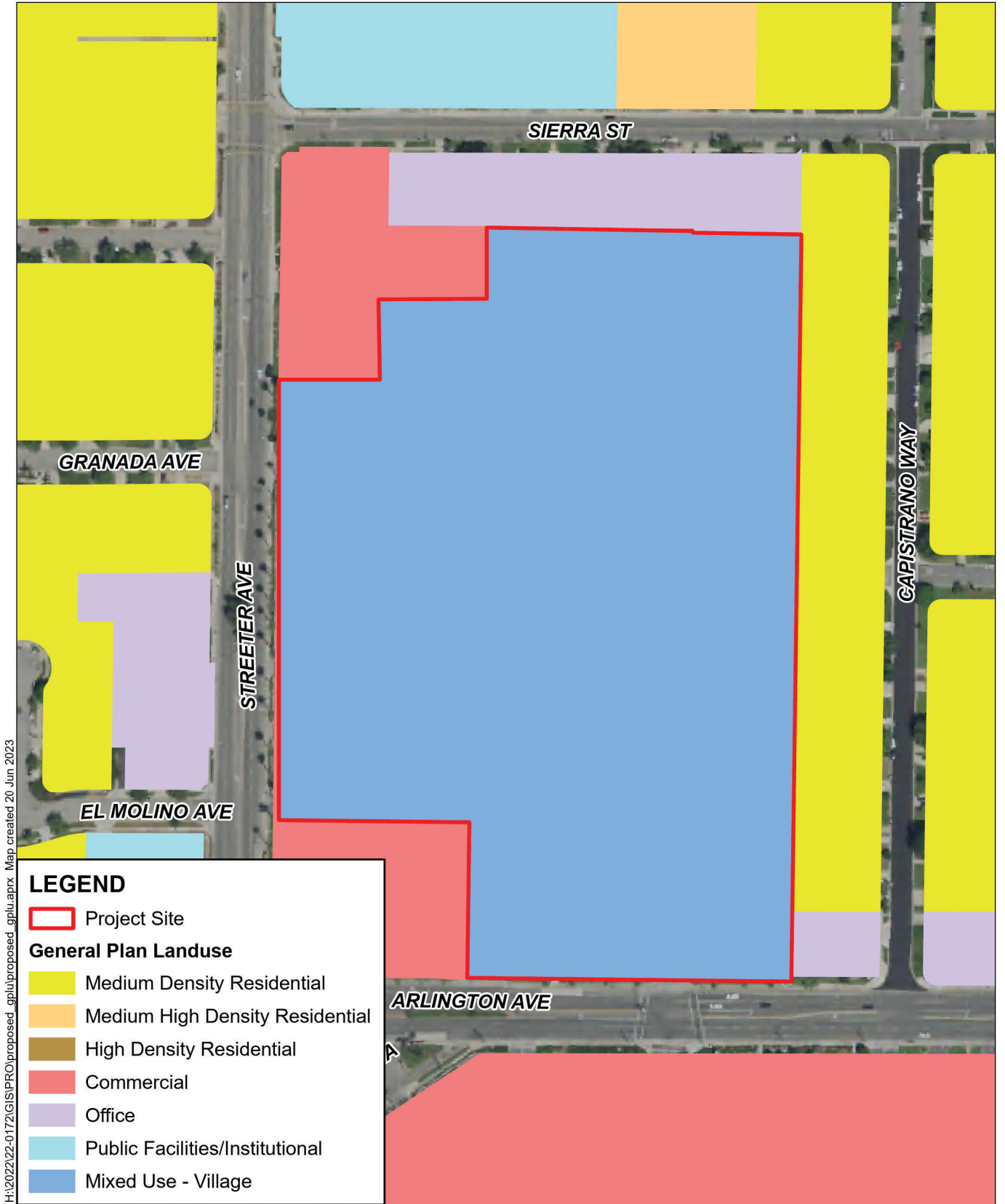
**Figure 1.0-7 Existing Airport Land Use Compatibility Zones**

Arlington Mixed Use



0 150 300 450 Feet





H:\2022\22-0172\GIS\PRO\proposed\_gplu.aprx. Map created 20 Jun 2023

Source: City of Riverside General Plan Land Use, 2021;  
Riverside Co. GIS, 2020.

**Figure 1.0-8 Proposed General Plan Land Use**

Arlington Mixed Use

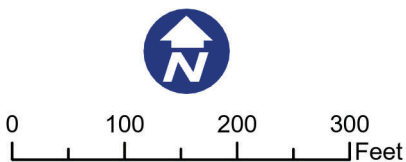


0 150 300 450 Feet

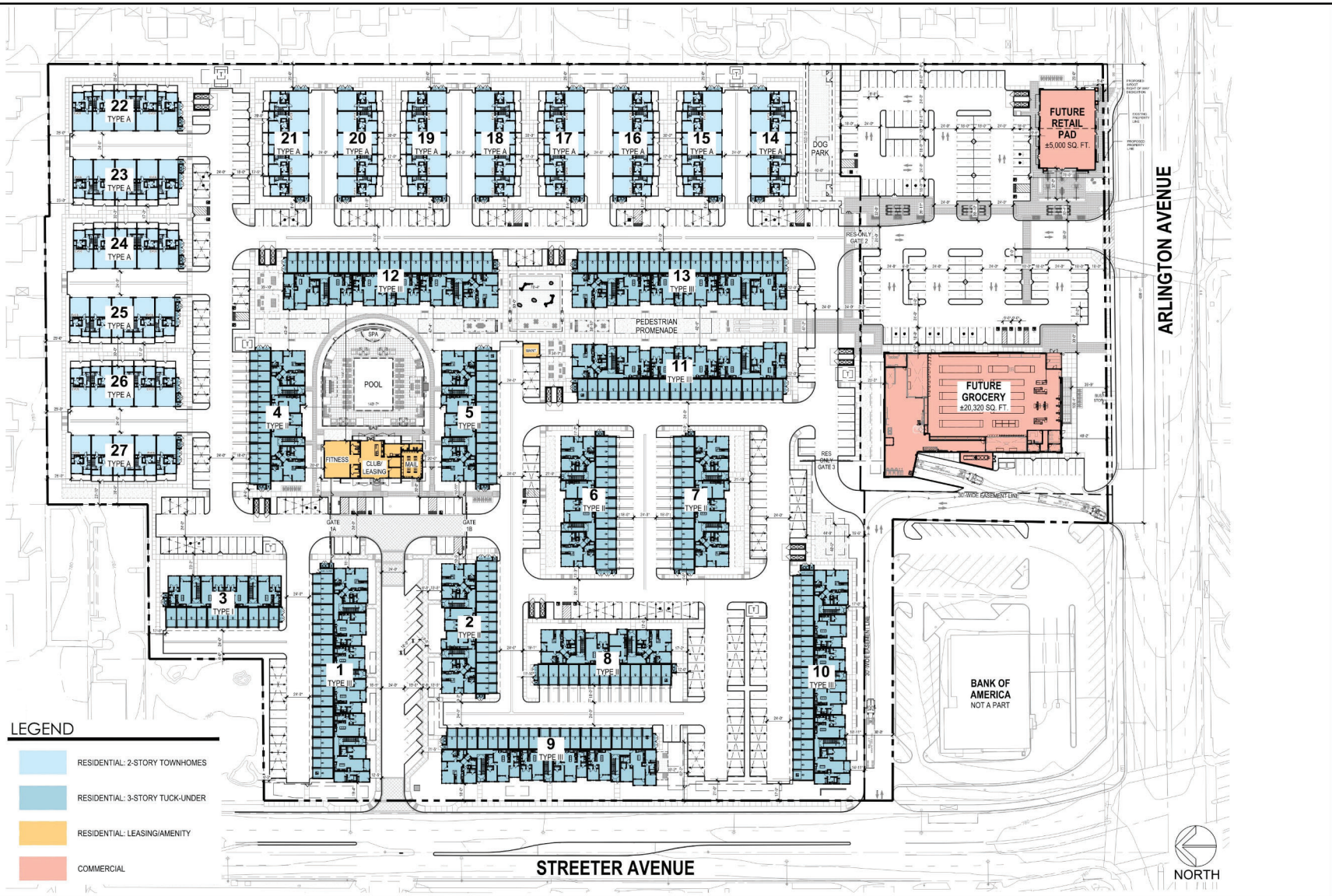




**Figure 1.0-9 Proposed Zoning**  
Arlington Mixed Use



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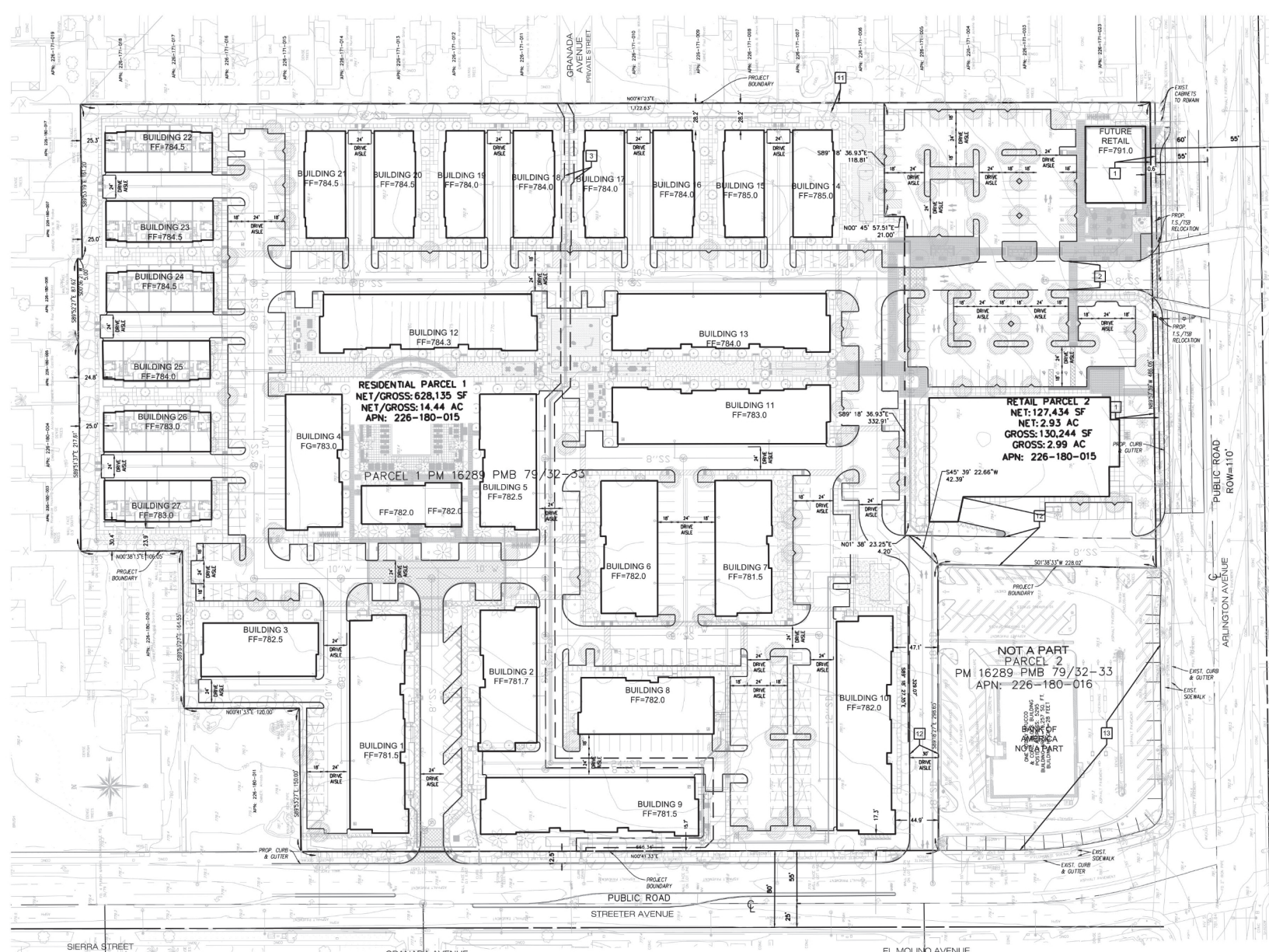
Source: Architects Orange June 15, 2023.

Figure 1.0-10 Proposed Site Plan  
Arlington Mixed Use

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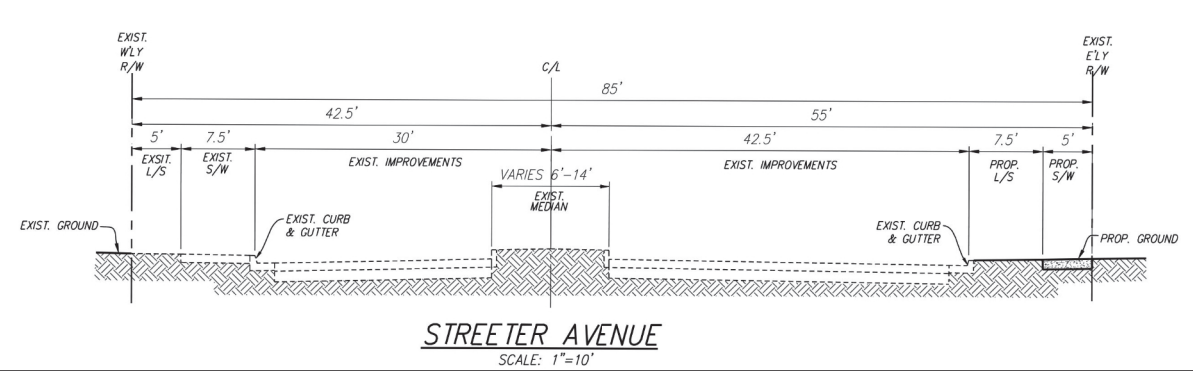
H:\2022\22-0172\GIS\PRO\tentative parcel.aprx Map created 24 Oct 2023



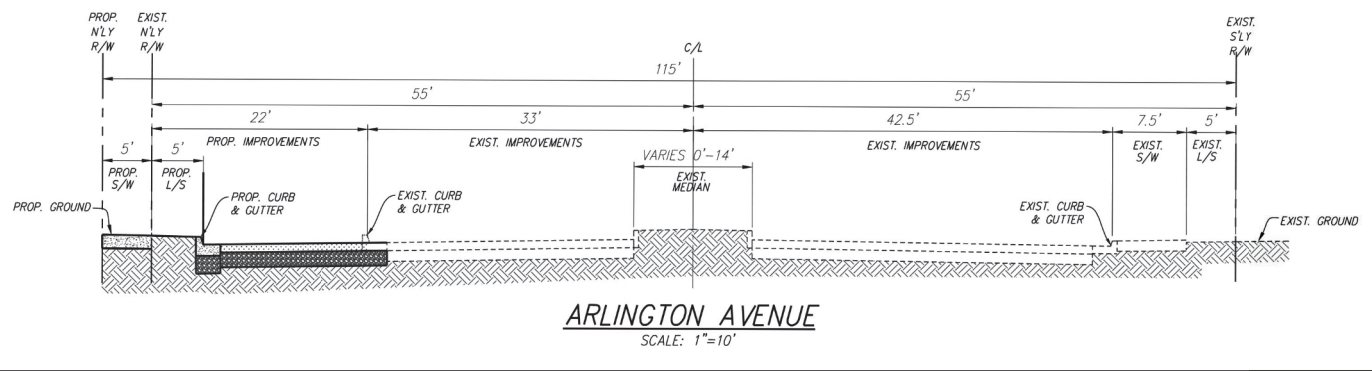
DEVELOPMENT STANDARDS FOR MU-V ZONE		
	REQUIREMENTS	PROPOSED
LOT AREA	20,000 SQ.FT (MINIMUM)	756,836 SQ.FT
LOT DEPTH	100 FT (MINIMUM)	1,123.25 FT
LOT WIDTH	75 FT (MINIMUM)	780.92 FT
FRONT YARD SETBACK	0 FT (MINIMUM)	5 FT
SIDE YARD SETBACK	0 FT (MINIMUM)	25 FT
REAR YARD SETBACK	15 FT (MINIMUM)	15.17 FT
BUILDING HEIGHT	45 FT (MAXIMUM)	41.25 FT (MAXIMUM)
FAR	2.5 (MAXIMUM)	0.6
RESIDENTIAL DENSITY (GROSS)	30 DU/AC (MAXIMUM)	22.30 DU/AC
OPEN SPACE REQUIREMENTS - STAND ALONE RESIDENTIAL	NA	NA
OPEN SPACE REQUIREMENTS - MIXED-USE DEVELOPMENT	NA	NA
PRIVATE OPEN SPACE	50 SQ.FT/DU (MINIMUM)	91.80 SQ.FT/DU
COMMON OPEN SPACE	50 SQ.FT/DU (MINIMUM)	147.90 SQ.FT/DU

PROJECT SUMMARY		
PARCEL NO.	NET SQUARE FEET	NET ACRES
PARCEL 1	628,135	14.44
PARCEL 2	127,434	2.93
TOTAL	755,569	17.37

PROJECT SUMMARY		
PARCEL NO.	GROSS SQUARE FEET	GROSS ACRES
PARCEL 1	628,135	14.44
PARCEL 2	130,244	2.99
TOTAL	758,379	17.43



**STREETER AVENUE**  
SCALE: 1"=10'



**ARLINGTON AVENUE**  
SCALE: 1"=10'

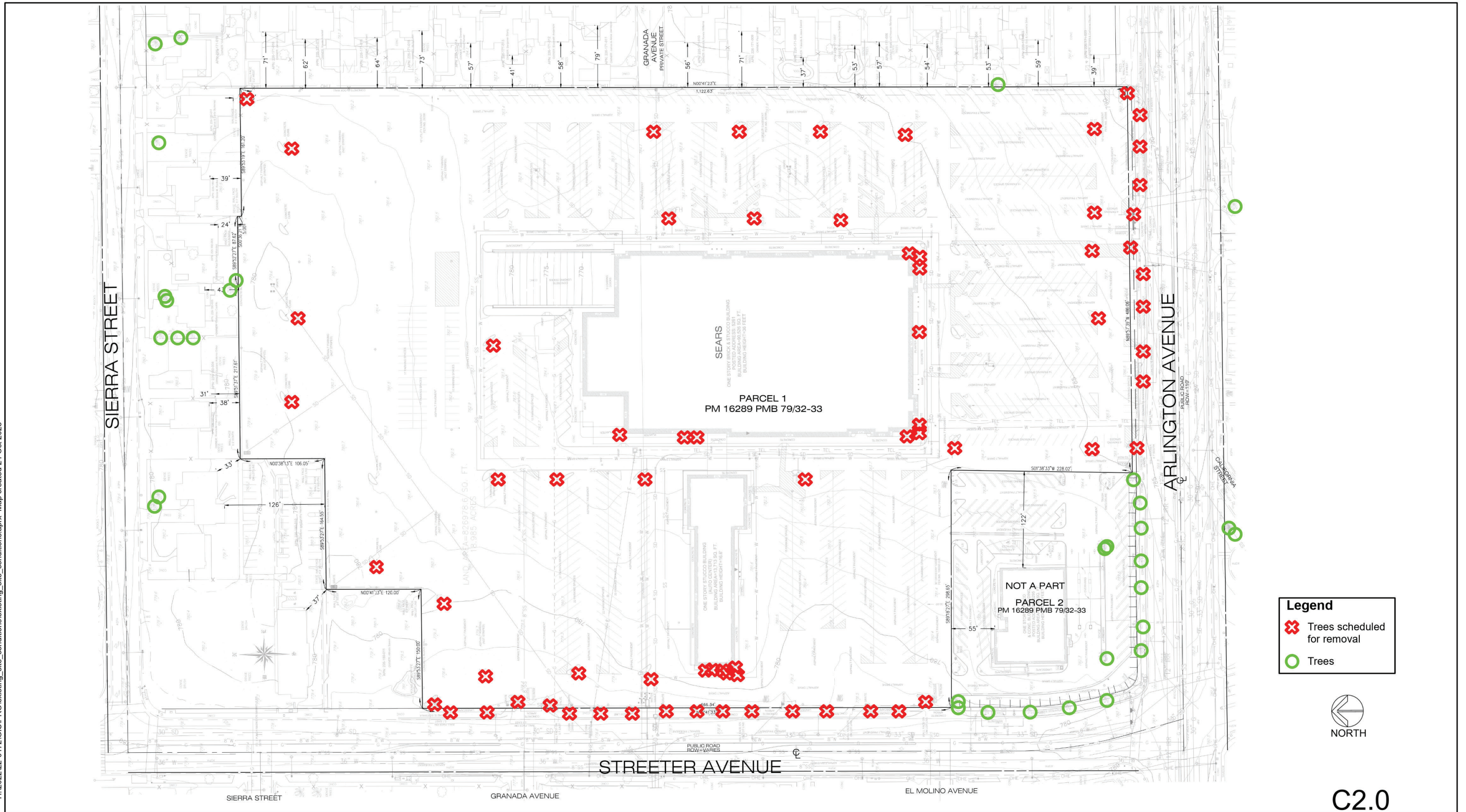
Source: Architects Orange, 2022.

**Figure 1.0-11 Tentative Parcel Map**  
Arlington Mixed Use

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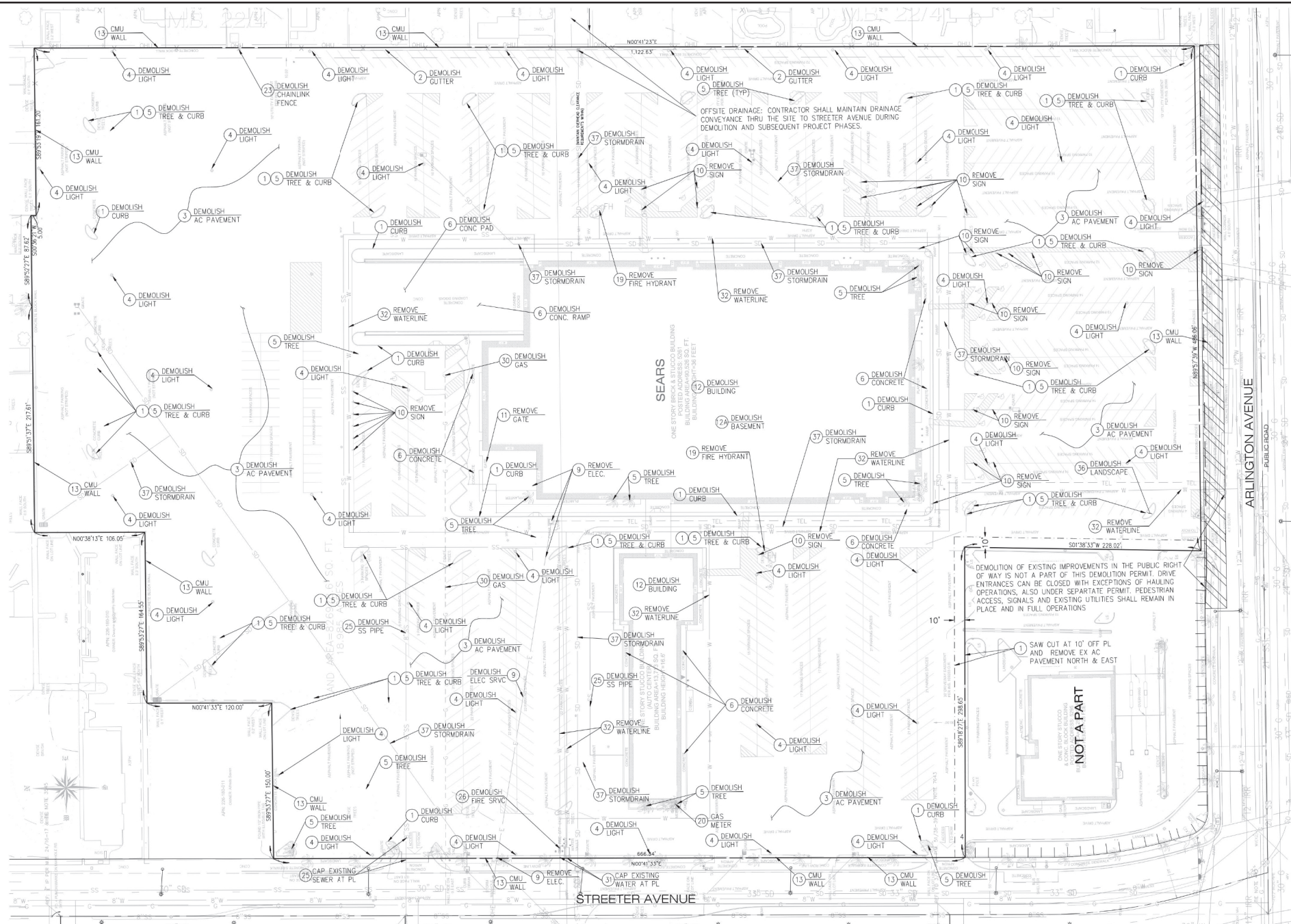


Source: Architects Orange Aug 5, 2022.

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**Figure 1.0-12 Existing Site Conditions**  
Arlington Mixed Use





**GENERAL DEMOLITION NOTES:**

- THIS WORK IS INTENDED TO INCLUDE DEMOLITION AND REMOVAL OF CONSTRUCTION INDICATED AND DISCONNECTION, CAPPING AND/OR REMOVAL OF AFFECTED UTILITIES. THE ORDER OR PHASE OF REMOVALS SHALL BE CONTRACTOR MEANS AND METHODS MEETING PERMIT REQUIREMENTS BY THE CITY AND UTILITY COMPANIES. CONTRACTOR SHALL PLAN ACTIVITIES OR PHASES ACCORDINGLY.
1. THE CONTRACTOR SHALL DEMOLISH AND REMOVE ALL EXISTING STRUCTURES AND APPURTENANCES AS INDICATED ON THESE PLANS IN AN ORDERLY AND CAREFUL MANNER.
  2. PRIOR TO DEMOLITION, THE CONTRACTOR SHALL VERIFY THE CONDITIONS AND REPORT ANY DISCREPANCY TO THE ENGINEER PRIOR TO START OF DEMOLITION.
  3. ALL DEBRIS FROM THE DEMOLITION WORK SHALL BE REMOVED FROM THE SITE AND DISPOSED OF AT A DUMP SITE APPROVED BY THE CITY OF RIVERSIDE.
  4. THE CONTRACTOR SHALL OBTAIN ALL NECESSARY PERMITS AND HAUL ROUTE APPROVALS FOR THE DEMOLITION WORK.
  5. ALL DEBRIS SHALL BE WET OR COVERED AT TIME OF HANDLING TO PREVENT DUST.
  6. CALL INSPECTOR OF RECORD DEPARTMENT FOR INSPECTION AT REQUIRED TIMES INCLUDING PREDEMOLITION, PEDESTRIAN PROTECTION, SEWER CAPPING, BACKFILLING, FINAL INSPECTIONS, ETC.
  7. REMOVE DEMOLISHED MATERIALS FROM SITE AS WORK PROGRESSES DAILY. LEAVE SITE IN CLEAN CONDITION. CONTACT CITY OF RIVERSIDE FOR REQUIREMENTS FOR DISPOSAL OF DEMOLITION DEBRIS.
  8. CONDUCT DEMOLITION TO MINIMIZE INTERFERENCE WITH ADJACENT STRUCTURES AND PEDESTRIAN ACCESS TO ADJACENT STRUCTURES.
  9. PROVIDE, ERECT, AND MAINTAIN TEMPORARY BARRIERS, SECURITY DEVICES, TRAFFIC CONTROL SIGNAGE AND PERSONNEL DURING WORK PERFORMED ADJACENT TO OR WITHIN PEDESTRIAN OR VEHICLE TRAVELWAYS AS REQUIRED BY CODE. WHEN LOCATED IN PUBLIC RIGHT-OF-WAY, IT MUST BE APPROVED AND INSTALLED UNDER USE OF PUBLIC PROPERTY PERMIT ISSUED BY THE CITY OF RIVERSIDE.
  10. CONDUCT OPERATIONS WITH MINIMUM INTERFERENCE TO PUBLIC OR PRIVATE ACCESS WAYS. MAINTAIN PROTECTED INGRESS AND EGRESS AT ALL TIMES. DO NOT CLOSE OR OBSTRUCT ROADWAYS OR PEDESTRIAN SIDEWALKS WITHOUT PERMISSION OF OWNER'S REPRESENTATIVE. TRAFFIC CONTROL PLAN IS REQUIRED AND SHOULD BE APPROVED BY THE CITY OF RIVERSIDE.
  11. BURNING OF MATERIALS AND/OR USE OF EXPLOSIVES ARE NOT PERMITTED.
  12. DEMOLITION SHALL BE WITHIN THE LIMITS OF WORK, UNLESS NOTED OTHERWISE.
  13. CONTRACTOR SHALL CONTACT ENGINEER IMMEDIATELY IF ANY ITEMS NOT SHOWN ON THE PLANS REQUIRE REMOVAL. FAILURE TO DO SO DOES NOT RELIEVE CONTRACTOR OF RESPONSIBILITY AND COST FOR REMOVING ITEMS REQUIRED.
  14. LOCATION OF ALL UNDERGROUND UTILITIES SHOWN ARE APPROXIMATE. CONTRACTOR IS RESPONSIBLE FOR REPAIR OF ANY DAMAGE CAUSED TO EXISTING UTILITIES AND UTILITY STRUCTURES THAT ARE TO REMAIN.
  15. EXISTING UNDERGROUND UTILITIES AND IMPROVEMENTS ARE SHOWN IN THEIR APPROXIMATE LOCATIONS BASED UPON RECORD INFORMATION AVAILABLE AT THE TIME OF PREPARATION OF PLANS. NO GUARANTEE IS MADE AS TO THE ACCURACY OR COMPLETENESS OF THE INFORMATION SHOWN. THE CONTRACTOR SHALL COORDINATE WITH UTILITY COMPANIES CONCERNING THE REMOVAL OF UTILITIES IN ADVANCE OF DEMOLITION ON THESE PLANS. ANY ADDITIONAL COSTS INCURRED AS A RESULT OF CONTRACTOR'S FAILURE TO VERIFY LOCATIONS OF EXISTING UTILITIES PRIOR TO BEGINNING OF CONSTRUCTION IN THEIR VICINITY SHALL BE BORNE BY THE CONTRACTOR AND ASSUMED INCLUDED IN THE CONTRACT.
  16. THE CONTRACTOR SHALL ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS, INCLUDING SAFETY OF ALL PERSONS AND PROPERTY, DURING THE COURSE OF CONSTRUCTION OF THIS PROJECT. THIS REQUIREMENT SHALL APPLY CONTINUOUSLY, AND SHALL NOT BE LIMITED TO NORMAL WORKING HOURS. THE CONTRACTOR SHALL DEFEND, INDEMNIFY AND HOLD THE OWNER AND ENGINEER HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT.
  17. DEMOLITION WORK SHALL NOT START UNLESS REQUIRED PEDESTRIAN PROTECTION STRUCTURES (IF REQUIRED) ARE IN PLACE.
  18. ALL WORK WILL BE IN ACCORDANCE WITH 2019 CBC, TITLE 24 OF CALIFORNIA CODE OF REGULATION AND ALL APPLICABLE CODE AND ORDINANCE AND REGULATIONS. NOTHING HEREIN SHALL BE INTERPRETED TO THE CONTRARY.
  19. A PRE-DEMOLITION COORDINATION MEETING SHALL BE HELD WITH OWNER'S REPRESENTATIVE PRIOR TO COMMENCEMENT OF DEMOLITION ACTIVITIES.
  20. CONTRACTOR TO COORDINATE WITH OWNER'S REPRESENTATIVE AND RESPECTIVE UTILITY COMPANY AS REQUIRED FOR SCHEDULE OF DEACTIVATION, POINTS OF DISCONNECTION, CAPPING AND/OR RECONNECTION OF UTILITY LINES.
  21. CONTRACTOR TO PROVIDE FOR THE TRANSPORT OF EXISTING STORM DRAIN AND WATER FLOWS IN SERVICES TO BE DEMOLISHED OR RELOCATED UNTIL THE RESPECTIVE REPLACEMENT UTILITIES HAVE BEEN CONSTRUCTED.
  22. PROTECTION FENCE WITH ATTACHED WINDSCREEN MATERIAL SHALL BE INSTALLED AROUND THE SITE, ALONG THE LIMIT OF DEMOLITION. H=6'

**NOTES:**

- UTILITIES PER RECORD PLANS.
1. CONTRACTOR TO CALL UNDERGROUND SERVICE ALERT OF CALIFORNIA AND PROCEED WITH CAUTION.
  2. SEPARATE PERMIT REQUIRED FOR WORK IN THE CITY RIGHT OF WAY, AND REMOVAL OF STREET TREES.
  3. SEE GENERAL NOTE 20 FOR COORDINATION WITH UTILITY COMPANY.
  4. CONTRACTOR TO REMOVE EXISTING IRRIGATION SYSTEM.
  5. CERTIFIED ARBORIST TO BE ON SITE DURING EXCAVATION AND TO PHOTO DOCUMENT ANY ROOT PRUNING. CLEAN TOOLS TO BE USED TO MINIMIZE SPREAD OF DISEASE TO TREE ROOTS. CAMBISTAT OR SIMILAR PLANT GROWTH REGULATOR TO BE UTILIZED.

**DEMOLITION CONSTRUCTION NOTES:**

- |                              |  |                                |  |  |
|------------------------------|--|--------------------------------|--|--|
| 1 DEMOLISH CURB & GUTTER     | 8 PROTECT IN PLACE FENCE                       | 15 PROTECT IN PLACE SEWER LINE | 22 REMOVE POWER POLE   | 30 REMOVE GAS LINE   |
| 2 DEMOLISH CONCRETE GUTTER   | 9 REMOVE ELECTRICAL EQUIP & ELECTRICAL SERVICE | 16 DEMOLISH TRASH ENCLOSURE    | 23 REMOVE CHAINLINK FENCE  | 31 CAP WATER LINE AT PROPERTY LINE   |
| 3 DEMOLISH ASPHALT CONCRETE  | 10 REMOVE SIGN                                 | 17 REMOVE UTILITY VAULT        | 25 REMOVE ON-SITE SANITARY SEWER, PLUG AND ABANDON AT STREETER RIGHT OF WAY. | 32 REMOVE WATER LINE   |
| 4 REMOVE LIGHT               | 11 REMOVE GATE                                 | 18 REMOVE ELECTRICAL CABINET   | 26 REMOVE FIRE SERVICE MAIN, DODA TO REMAIN TEMPORARY                        | 33 CAP DRAIN INLET   |
| 5 REMOVE TREE                | 12 DEMOLISH BUILDING                           | 19 REMOVE FIRE HYDRANT         | 27 DEMOLISH GUARD POST   | 34 REMOVE BACKFLOW PREVENTER   |
| 6 DEMOLISH CONCRETE          | 12a DEMOLISH BASEMENT, AREA= 85,634SF          | 20 REMOVE GAS SERVICE          | 28 PROTECT IN PLACE RETAINING WALL   | 36 REMOVE LANDSCAPE  |
| 7 DEMOLISH CONCRETE SIDEWALK | 13 DEMOLISH CMU PERIMETER WALL                 | 21 REMOVE UTILITY POLE         | 29 CAP GAS LINE AT PROPERTY LINE   | 37 DEMOLISH AND REMOVE EXISTING SD TO PROPERTY LINE. MAINTAIN CATCH BASIN'S AT R.O.W. AND PROTECT LATERAL'S AT PUBLIC R.O.W. |
|                              | 14 DEMOLISH PARKWAY DRAIN                      |                                |  |  |

Source: Architects Orange Aug 5, 2022.

**Figure 1.0-13 Proposed Demolition Plan  
Arlington Mixed Use**

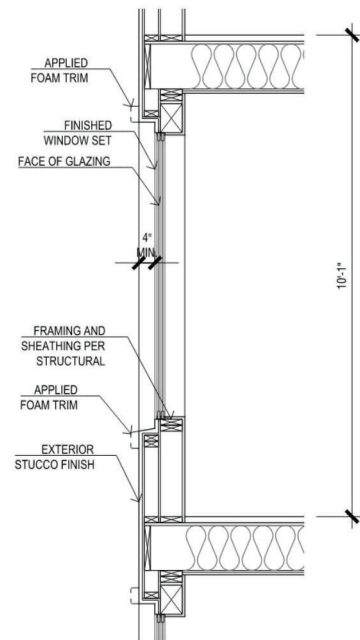
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45'-0" MAXIMUM HEIGHT



FRONT ELEVATION 1



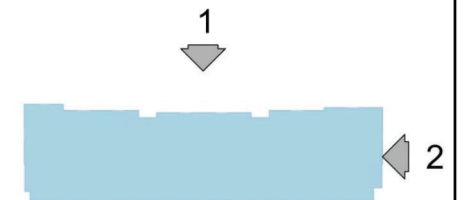
**STUCCO WINDOW - RECESSED 4"**  
 (TO OCCUR ON WINDOWS FACING PUBLIC RIGHT OF WAY)  
 SCALE: 1/2" = 1'-0"

45'-0" MAXIMUM HEIGHT



LEFT ELEVATION 2

KEY MAP



H:\2022\22-0172\GIS\PRO\building\_elevations.aprx Map created 23 Oct 2023

Source: Architects Orange June 15, 2023.

Figure 1.0-14 Proposed Elevations [Garden Style Type III - Front & Left]

Arlington Mixed Use

NTS



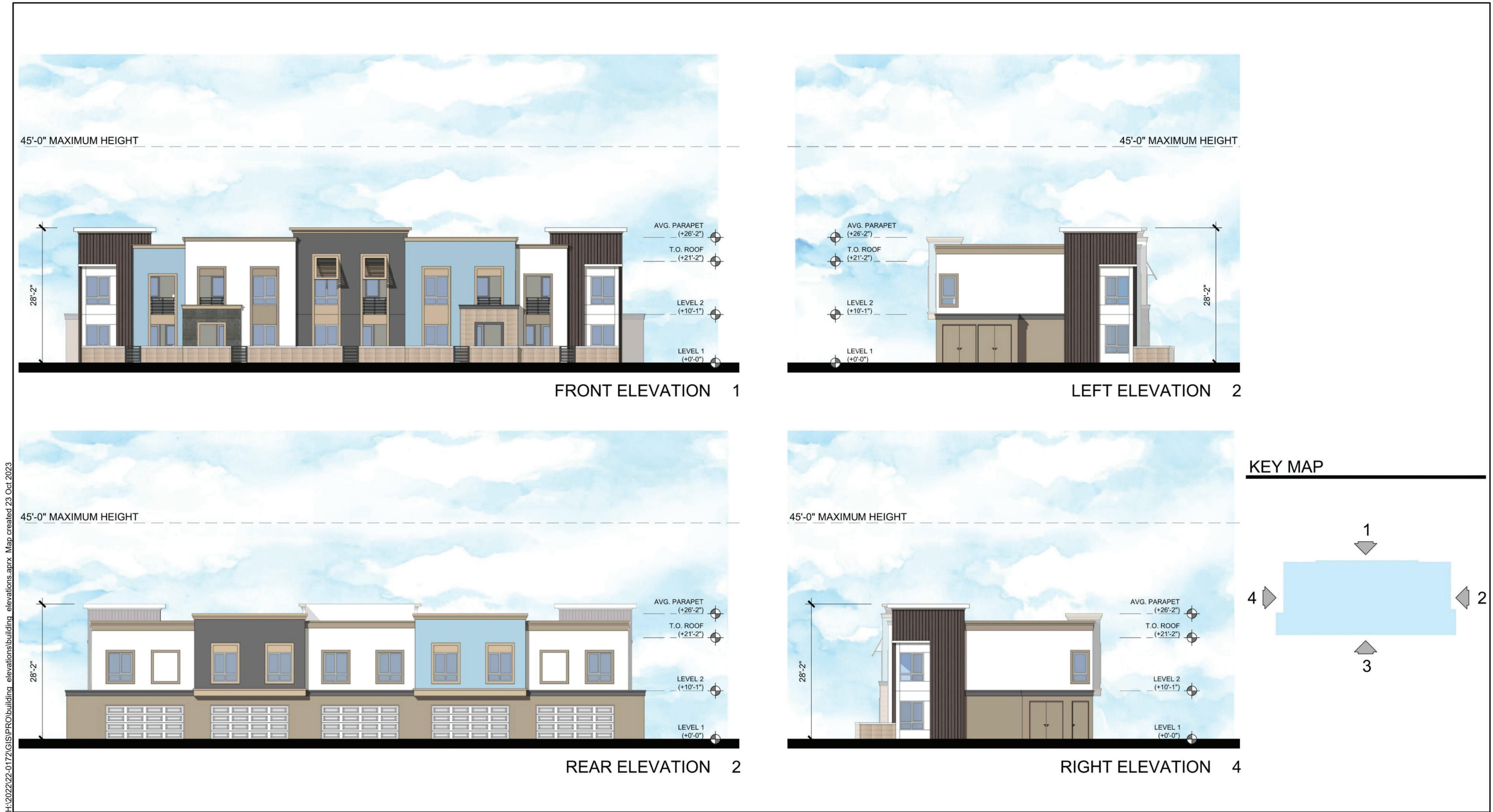


H:\2022\22-0172\GIS\PRO\building\_elevations.aprx Map created 23 Oct 2023

Source: Architects Orange June 15, 2023.

**Figure 1.0-15 Proposed Elevations [Garden Style Type III - Rear & Right]**  
Arlington Mixed Use

NTS



H:\2022\22-0172\GIS\PRO\building\_elevations\building\_elevations.aprx Map created 23 Oct 2023

Source: Architects Orange June 15, 2023.

NTS

**Figure 1.0-16 Proposed Elevations [Townhomes]**  
Arlington Mixed Use







H:\2023\22-0172\GIS\PRO\proposed floor plan\proposed floor plan.aprx. Map created 23 Oct 2023

Sources: Architects Orange June 15, 2023.

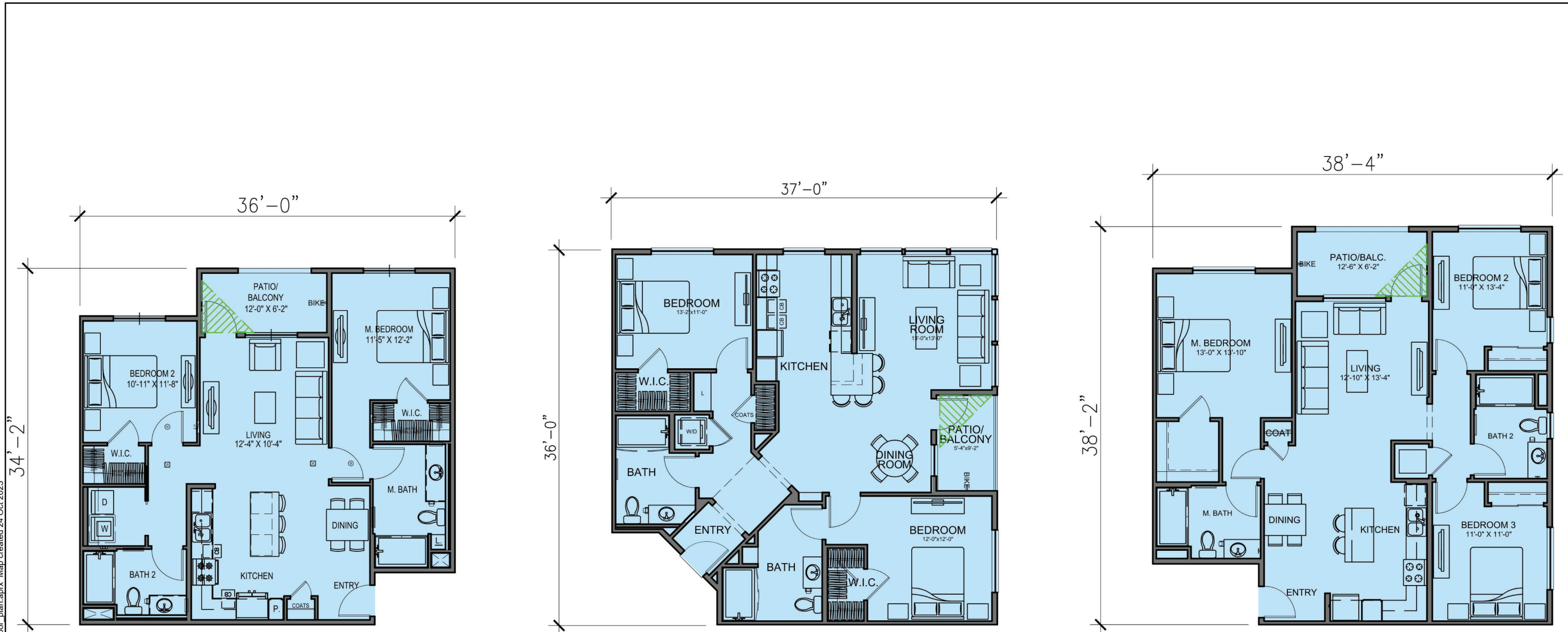
**Figure 1.0-17 Proposed Floor Plans [Garden Style Plans 1 of 2]**

NTS

Arlington Mixed Use



H:\2022\22-0172\GIS\PRO\proposed\_floor\_plan\proposed\_floor\_plan.aprx Map created 24 Oct 2023



UNIT B2 - OPTION 1  
 2 BED - 2 BATH  
 NET LIVABLE: 1054 SQ. FT.  
 PATIO/DECK : 69 SQ. FT.

UNIT B4  
 2 BEDROOM - 2 BATH  
 UNIT AREA: 1205 SQ. FT.  
 PATIO/ BALCONY: 50 SQ. FT.

UNIT C1 - OPTION 1  
 3 BED - 2 BATH  
 NET LIVABLE: 1265 SQ. FT.  
 PATIO/DECK : 77 SQ. FT.

**LEGEND**

 5'x5' MIN. OPEN SPACE DIMENSION

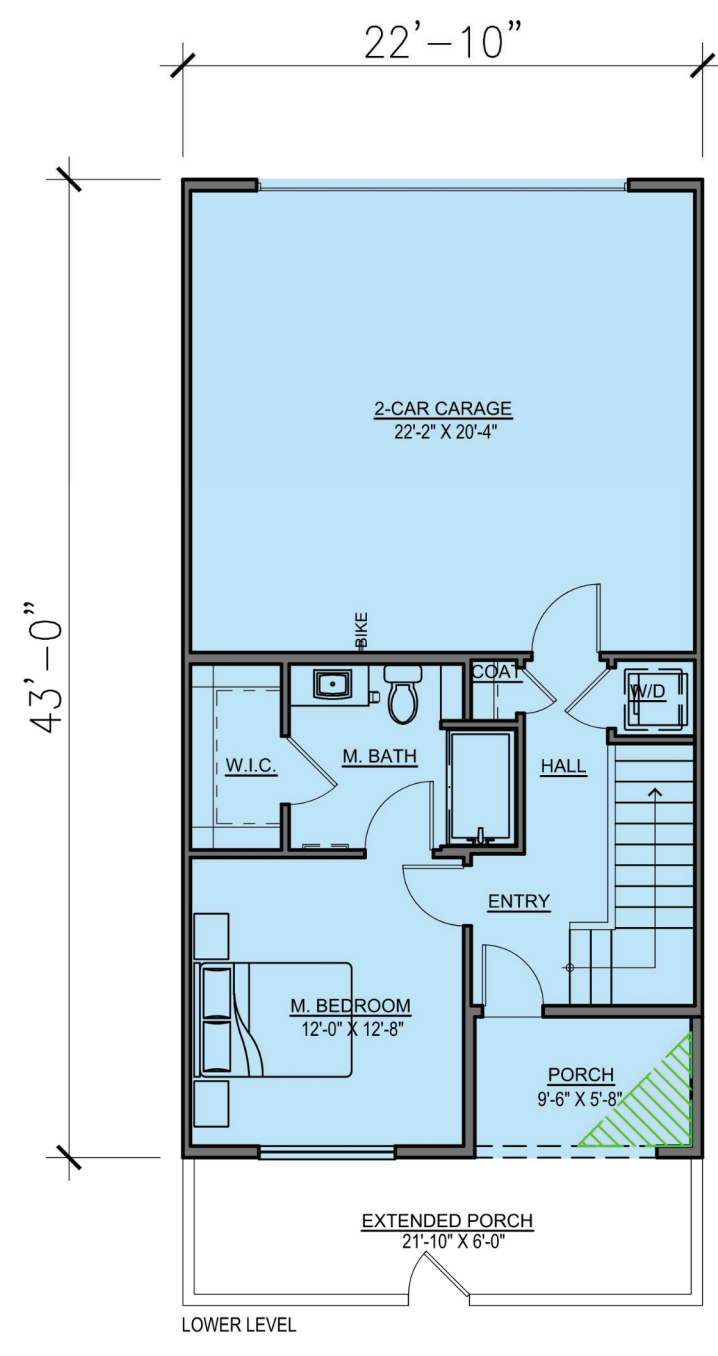
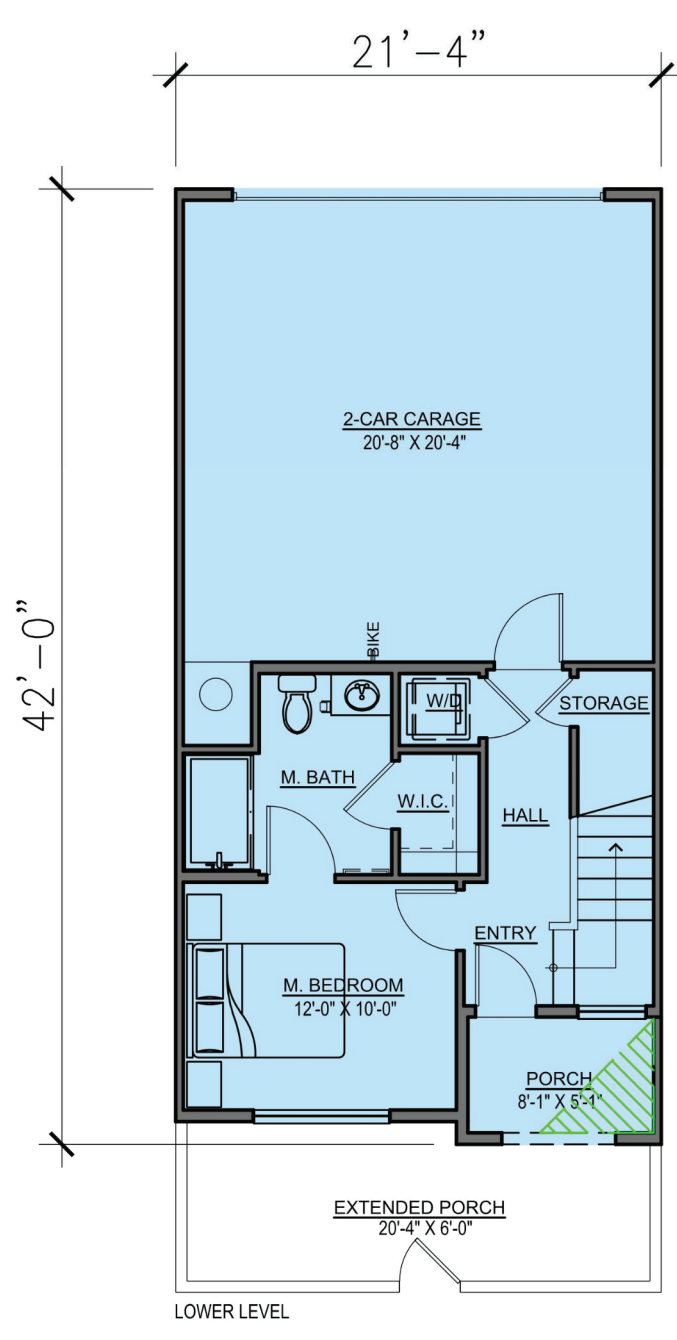
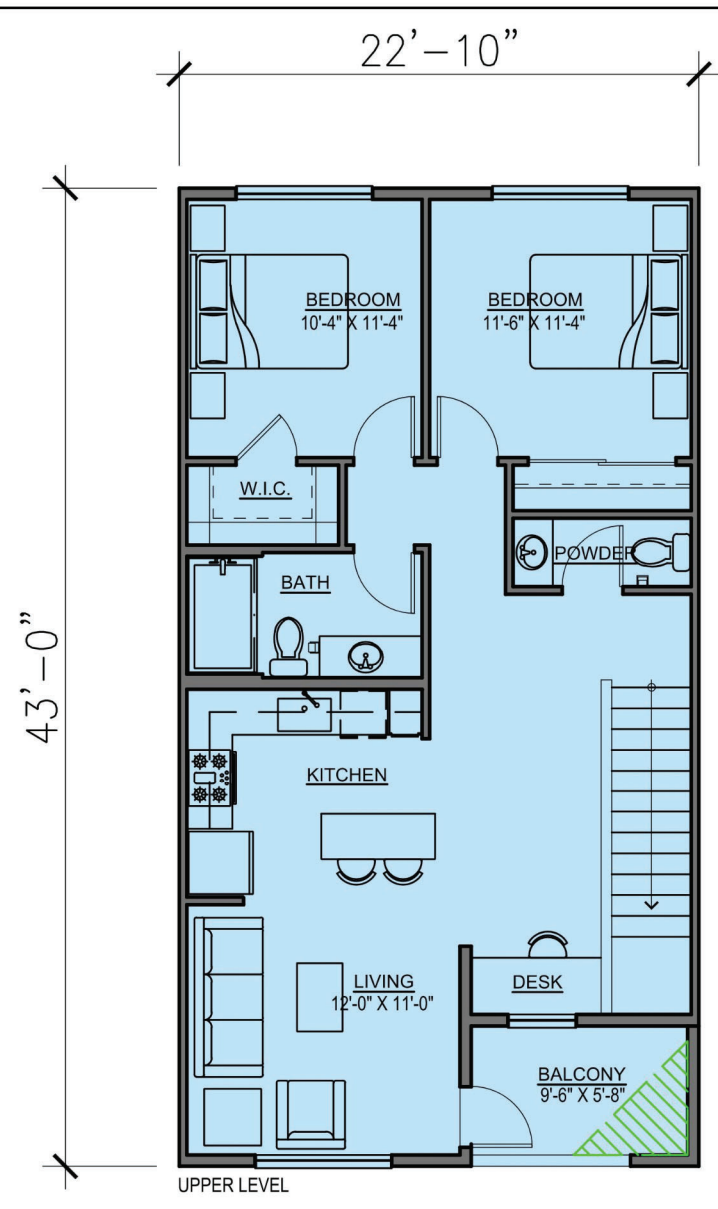
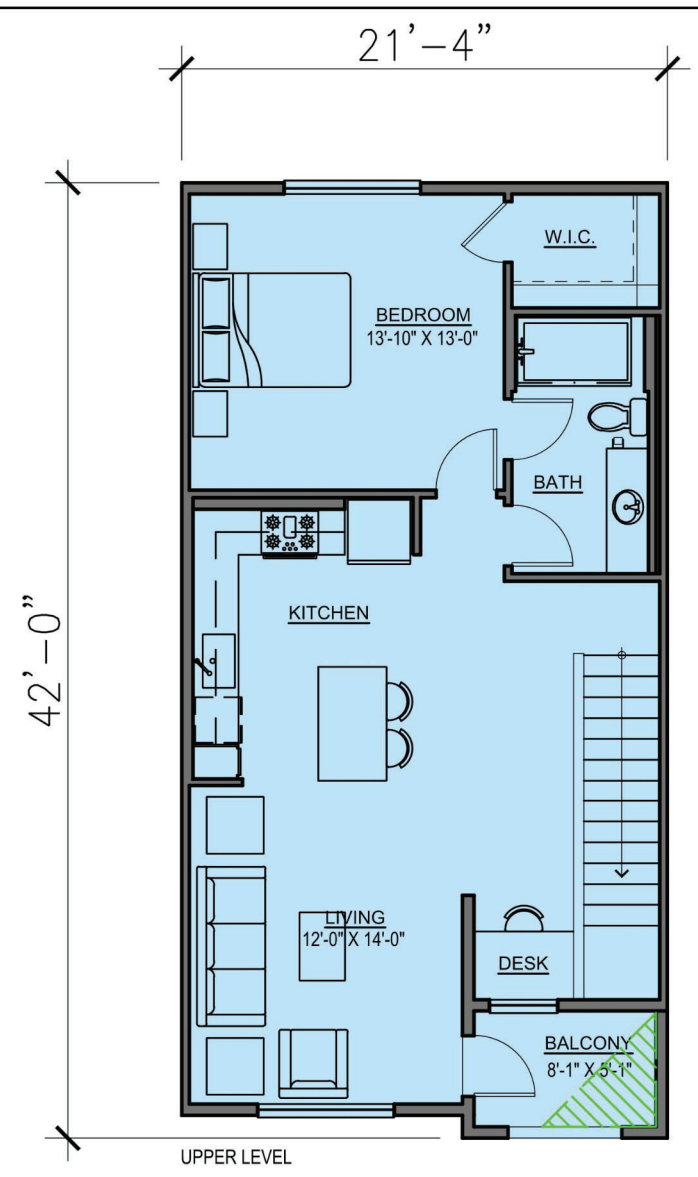
Source: Architects Orange June 15, 2023.

**Figure 1.0-18 Proposed Floor Plans [Garden Style Plans 2 of 2]**

Arlington Mixed Use

NTS

H:\2021\22-0172\GIS\PRO\proposed\_floor\_plan\proposed\_floor\_plan.aprx Map created 24 Oct 2023



**LEGEND**  
 5'x5' MIN. OPEN SPACE DIMENSION

**UNIT B3 -TOWNHOME**  
 2 BED - 2 BATH  
 NET LIVABLE: 1162 SQ. FT.  
 PATIO/DECK : 215 SQ. FT.

**UNIT C2**  
 3 BED - 2.5 BATH  
 NET LIVABLE: 1307 SQ. FT.  
 PATIO/DECK : 243 SQ. FT.

Sources: Architects Orange June 15, 2023.

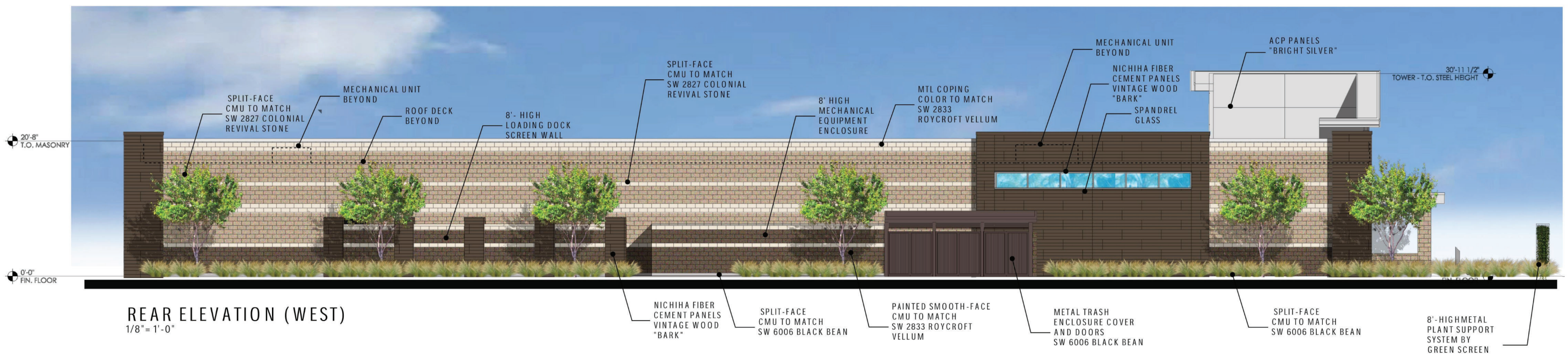
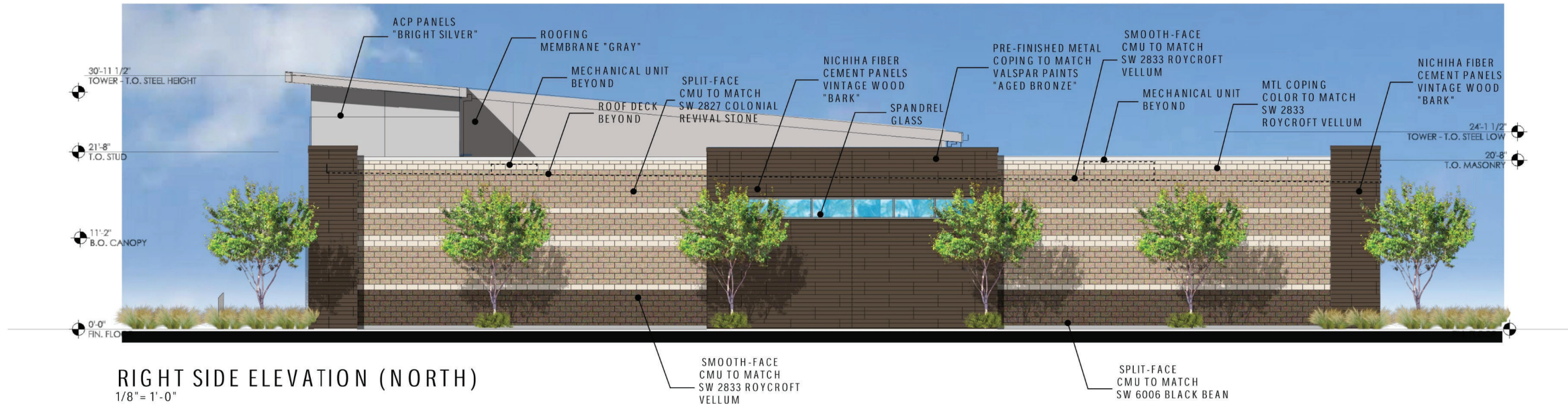
**Figure 1.0-19 Proposed Floor Plans [Townhome Plans]**

NTS

Arlington Mixed Use







H:\2022\22-0172\GIS\PRO\building\_elevations\building\_elevations.aprx Map created 24 Oct 2023

Source: Conceptual Exterior Elevations, ALDI Inc. July 21, 2023.

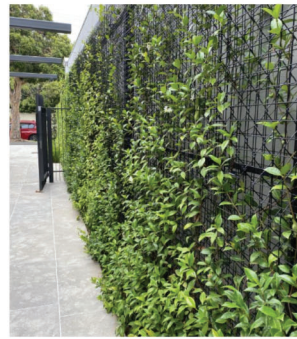
**Figure 1.0-20 Proposed Elevations ALDI**

NTS

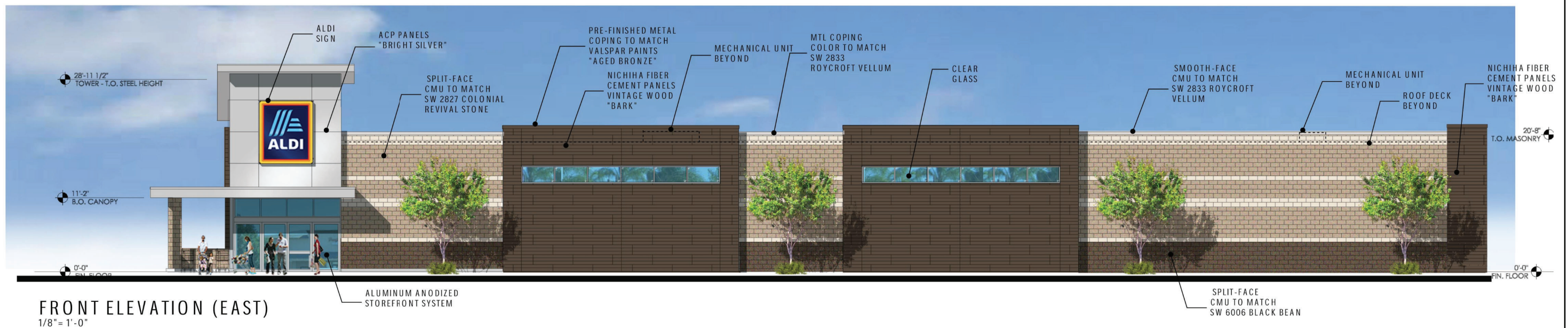
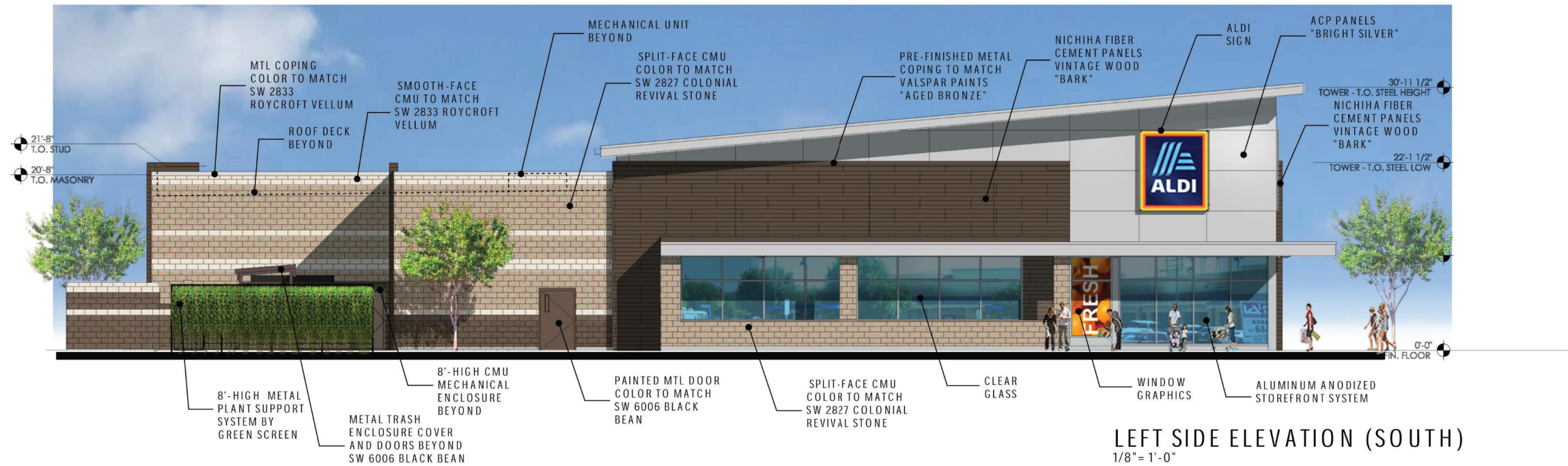
**Right & Rear**  
Arlington Mixed Use







METAL PLANT SUPPORT SYSTEM PRECEDENT IMAGES



H:\2022\22-0172\GIS\PRO\building\_elevations.aprx Map created 24 Oct 2023

Source: Conceptual Exterior Elevations, ALDI Inc. July 21, 2023.

**Figure 1.0-21 Proposed Elevations ALDI**  
**Left & Front**  
Arlington Mixed Use

NTS

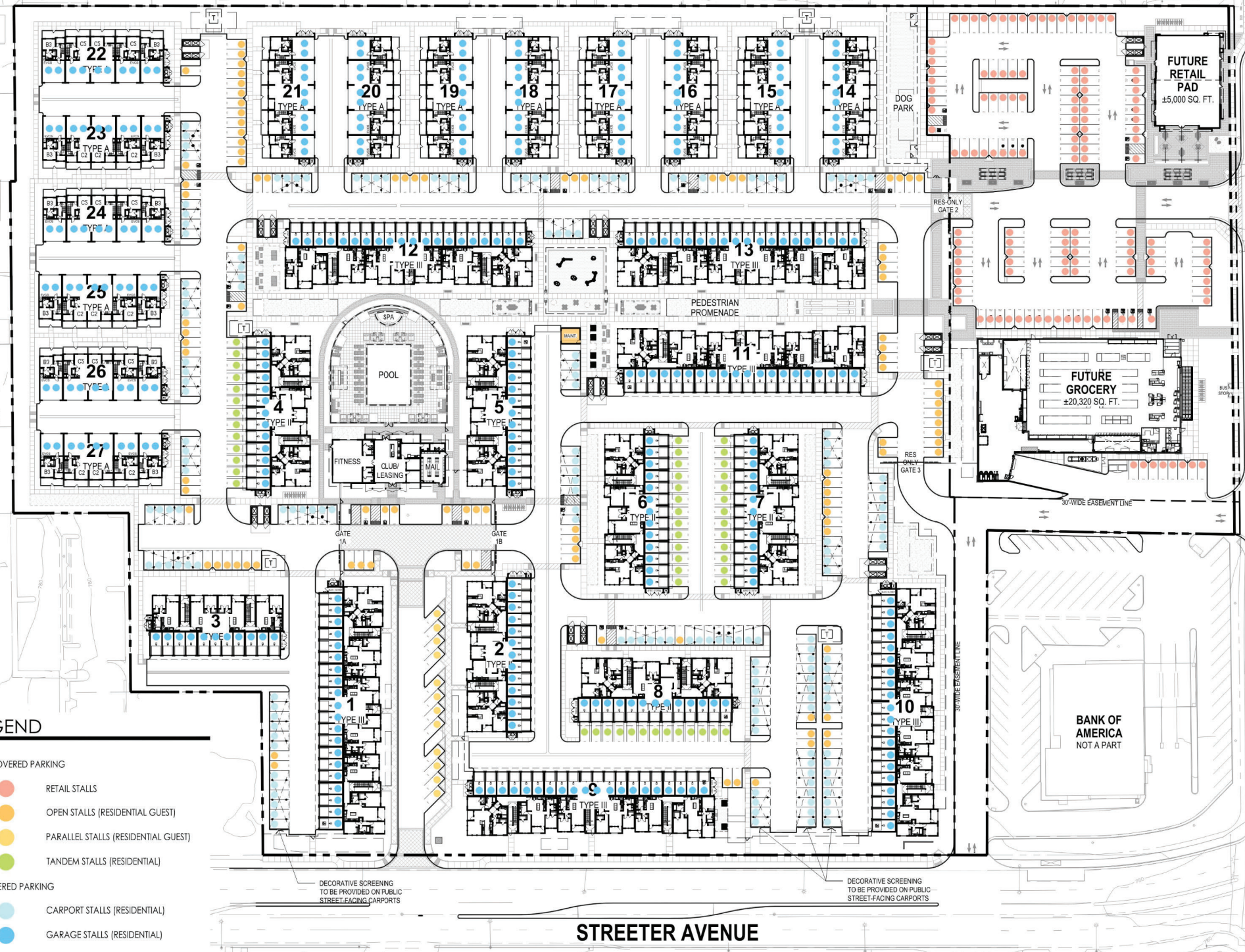




H:\2022\22-0172\GIS\PRO\parking\parking.aprx Map created 24 Oct 2023

**LEGEND**

- UNCOVERED PARKING
  - RETAIL STALLS
  - OPEN STALLS (RESIDENTIAL GUEST)
  - PARALLEL STALLS (RESIDENTIAL GUEST)
  - TANDEM STALLS (RESIDENTIAL)
- COVERED PARKING
  - CARPORT STALLS (RESIDENTIAL)
  - GARAGE STALLS (RESIDENTIAL)



ARLINGTON AVENUE

STREETER AVENUE



VEHICLE PARKING - REQUIRED						
<b>RESIDENTIAL PARKING REQUIRED (9'-0"X18'-0")</b>						
UNIT TYPE	NUMBER OF UNITS	REQUIRED RATIO	TOTAL STALLS REQUIRED			
STUDIOS	18	1.0	18			
1 BEDROOM	152	1.5	228			
2 BEDROOM	158	2.0	316			
3 BEDROOM	60	2.0	120			
<b>TOTAL UNITS</b>	<b>388</b>					
<b>TOTAL RESIDENTIAL PARKING REQUIRED:</b>			<b>682</b>			
COVERED RESIDENTIAL PARKING REQUIRED:			75%			
<b>PARKING RATIO:</b>			<b>1.8</b>			
<b>RETAIL PARKING REQUIRED (9'-0"X18'-0")</b>						
PARKING TYPE PER USE	TOTAL FLOOR AREA (SQ. FT.)	RATIO PER SQ. FT.	STALLS REQUIRED			
GROCERY	20,320	1 PER 250	82			
RETAIL PAD	5,000	1 PER 100	50			
<b>TOTAL RETAIL PARKING REQUIRED:</b>			<b>132</b>			
<b>DESIGNATED USPS STALL REQUIRED (9'-0"X18'-0")</b>			<b>1</b>			
<b>ACCESSIBLE STALLS REQUIRED (MIN. 9'-0"X18'-0")</b>						
PARKING TYPE PER USE	QTY.	RATIO	REQ.	OF REQUIRED	STANDARD	VAN**
ADA - RESIDENTIAL COVERED*	512	2.0%	11	9	2	
ADA - RESIDENTIAL GUEST*	170	5.0%	9	7	2	
ADA - RETAIL*	132	5.0%	7	6	1	
<b>TOTAL:</b>			<b>27</b>	<b>22</b>	<b>5</b>	
<b>TOTAL ACCESSIBLE STALLS REQUIRED:</b>			<b>27</b>			
<b>EVCS STALLS REQUIRED (MIN. 9'-0"X18'-0")</b>						
PARKING TYPE PER USE	QTY.	RATIO	REQ.	ACCESSIBLE REQUIRED***		
EVCS - RESIDENTIAL COVERED*	512	10.0%	52	3		
EVCS - RESIDENTIAL GUEST*	170	10.0%	17	1		
EVCS - RETAIL*	132	10.0%	14	1		
<b>TOTAL EVCS STALLS REQUIRED:</b>			<b>83</b>			
<small>*NOTE: INCLUDED IN PARKING COUNT</small>						
<small>**PROVIDE (1) VAN ACCESSIBLE STALL FOR EVERY 8 ACCESSIBLE STALLS PROVIDED</small>						
<small>***PROVIDE (1) ACCESSIBLE STALL FOR EVERY 25 EVCS STALLS PROVIDED</small>						
<b>TOTAL STALLS REQUIRED</b>			<b>815</b>			

VEHICLE PARKING - PROVIDED						
<b>RESIDENTIAL</b>						
PARKING TYPE	STD.	ADA		EVCS		TOTAL
		STD.	VAN	STD.	ADA	
GARAGE STALLS	307	6		36		349
CARPORT STALLS	150	3	2	17	1	173
OPEN STALLS	72	7	2	13	2	96
DIAGONAL STALLS	12					12
TANDEM STALLS	52					52
USPS STALL	1					1
<b>SUBTOTAL</b>	<b>594</b>	<b>16</b>	<b>4</b>	<b>66</b>	<b>3</b>	<b>683</b>
<b>TOTAL RESIDENTIAL PARKING PROVIDED:</b>					<b>683</b>	
COVERED RESIDENTIAL PARKING PROVIDED:					522 76.4%	
<b>RETAIL</b>						
PARKING TYPE	STD.	ADA		EVCS		TOTAL
		STD.	VAN	STD.	ADA	
OPEN - GROCERY LOT	50	3	1	6	1	61
OPEN - RETAIL PAD LOT	61	3		6	1	71
<b>SUBTOTAL</b>	<b>111</b>	<b>6</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>132</b>
<b>TOTAL RETAIL PARKING PROVIDED:</b>					<b>132</b>	
<b>TOTAL PARKING PROVIDED:</b>					<b>815</b>	
<b>BICYCLE PARKING</b>						
<b>SHORT-TERM BICYCLE PARKING</b>						
RATIO	TOTAL VEHICLE PARKING STALLS	TOTAL BICYCLE STALLS REQUIRED	TOTAL BICYCLE STALLS PROVIDED			
0.05	815	41	41			
<b>SHORT-TERM BICYCLE PARKING</b>						
RATIO	TOTAL VEHICLE PARKING STALLS	TOTAL BICYCLE STALLS REQUIRED	TOTAL BICYCLE STALLS PROVIDED			
0.05	815	41	41			

Source: Architects Orange June 15, 2023.

**Figure 1.0-22 Proposed Parking Plan**  
Arlington Mixed Use

NTS





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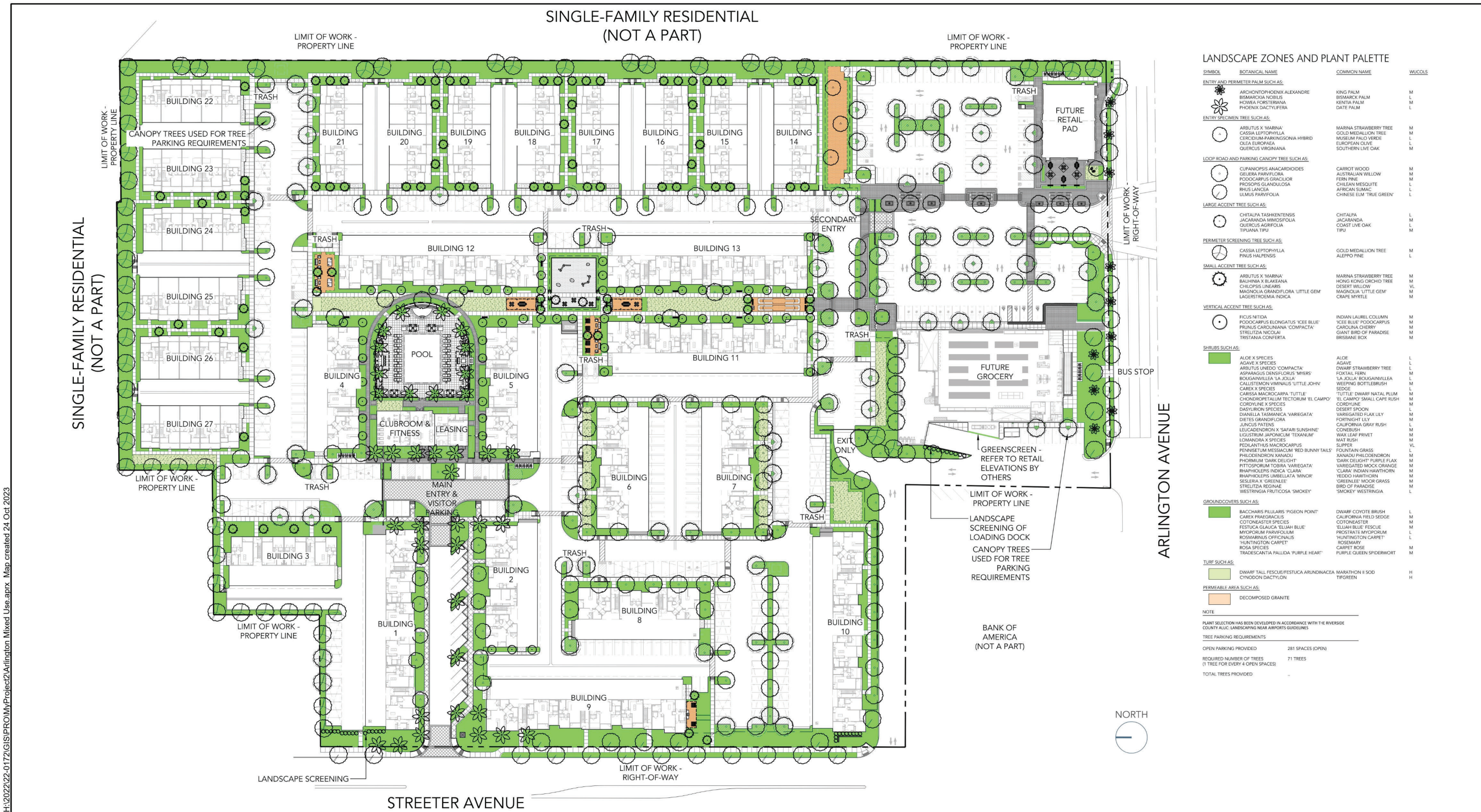
Source: Architects Orange July 24, 2023.

Figure 1.0-23 Conceptual Landscape Plan

Arlington Mixed Use

NTS





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Source: Architects Orange July 24, 2023.

**Figure 1.0-24 Landscaping Planting Plan**  
Arlington Mixed Use

NTS



H:\2023\22-0172\GIS\PROJECT\Arlington Mixed Use.aprx Map created 24 Oct 2023

TREES:



WASHINGTONIA ROBUSTA  
MEXICAN FAN PALM



OLEA EUROPAEA  
EUROPEAN OLIVE



PROSOPIS CHILENSIS  
CHILEAN MESQUITE



CASSIA LEPTOPHYLLA  
GOLD MEDALLION TREE



JACARANDA MIMOSIFOLIA  
JACARANDA



PINUS CANARIENSIS  
CANARY ISLAND PINE



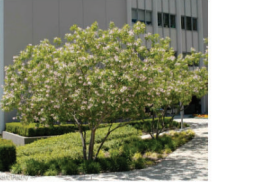
ARBUTUS X 'MARINA'  
MARINA STRAWBERRY TREE MULTI



TRISTANIA CONFERTA  
BRISBANE BOX



PODOCARPUS 'ICEE BLUE'  
ICEE BLUE YELLOW-WOOD



CHITALPA TASHKENTENSIS  
CHITALPA

SHRUBS AND BMP SHRUBS:



ALOE SPP  
ALOE



AGAVE SPP  
AGAVE



ARBUTUS UNEDO 'COMPACTA'  
DWARF STRAWBERRY TREE



ASPARGUS DENSIFLORUS 'MYERS'  
FOXTAIL FERN



BOUGAINVILLEA 'LA JOLLA'  
'LA JOLLA' BOUGAINVILLEA



CALLISTEMON VIMINALIS 'LITTLE JOHN'  
WEEPING BOTTLEBRUSH



CAREX SPP  
SEDEGE



CARISSA MACROCARPA 'TUTTLE'  
'TUTTLE' DWARF NATAL PLUM



CHONDROPETALUM TECTORUM 'EL CAMPO'  
'EL CAMPO' SMALL CAPE RUSH



CORDYLINAE SPP.  
CORDYLINAE



DASYLIRION SPP  
DESERT SPOON



DIANELLA TASMANICA 'VARIEGATA'  
VARIEGATED FLAX LILY



DIETES GRANDIFLORA  
FORTNIGHT LILY



JUNCUS PATENS  
CALIFORNIA GRAY RUSH



LEUCADENDRON X 'SAFARI SUNSHINE'  
CONEBUSH

Source: Architects Orange July 24, 2023.

# Figure 1.0-25 Plant Palette [1 of 2]

Arlington Mixed Use



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SHRUBS (CONTINUED)



LIGUSTRUM JAPONICUM 'TEXTANUM'  
WAX LEAF PRIVET



LOMANDRA SPP  
MAT RUSH



PEDILANTHUS MACROCARPUS  
SLIPPER



PENNISETUM MESSIACUM 'RED BUNNY TAILS'  
FOUNTAIN GRASS



PHILODENDRON XANADU  
XANADU PHILODENDRON



PHORMIUM 'DARK DELIGHT'  
'DARK DELIGHT' PURPLE FLAX



PITTOSPORUM TOBIRA 'VARIEGATA'  
VARIEGATED MOCK ORANGE



RHAMPHILEPIS INDICA 'CLARA'  
'CLARA' INDIAN HAWTHORN



RHAMPHILEPIS UMBELLATA 'MINOR'  
YEDDO HAWTHORN



SESLERIA X 'GREENLEE'  
'GREENLEE' MOOR GRASS



STRELITZIA REGINAE  
BIRD OF PARADISE



WESTRINGIA FRUTICOSA 'SMOKEY'  
'SMOKEY' WESTRINGIA

GROUND COVERS:



BACCHARIS PILLULARIS 'PIGEON POINT'  
DWARF COYOTE BUSH



CAREX PRAEGRACILIS  
CALIFORNIA FIELD SEDGE



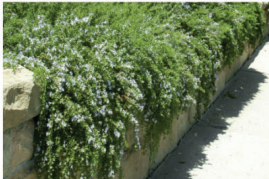
COTONEASTER SPP  
COTONEASTER



FESTUCA GLAUCA 'ELIJAH BLUE'  
'ELIJAH BLUE' FESCUE



MYOPORUM PARVIFOLIUM  
PROSTRATE MYOPORUM



ROSMARINUS OFFICINALIS 'HUNTINGTON CARPET'  
'HUNTINGTON CARPET' ROSEMARY



ROSA SPP  
CARPET ROSE

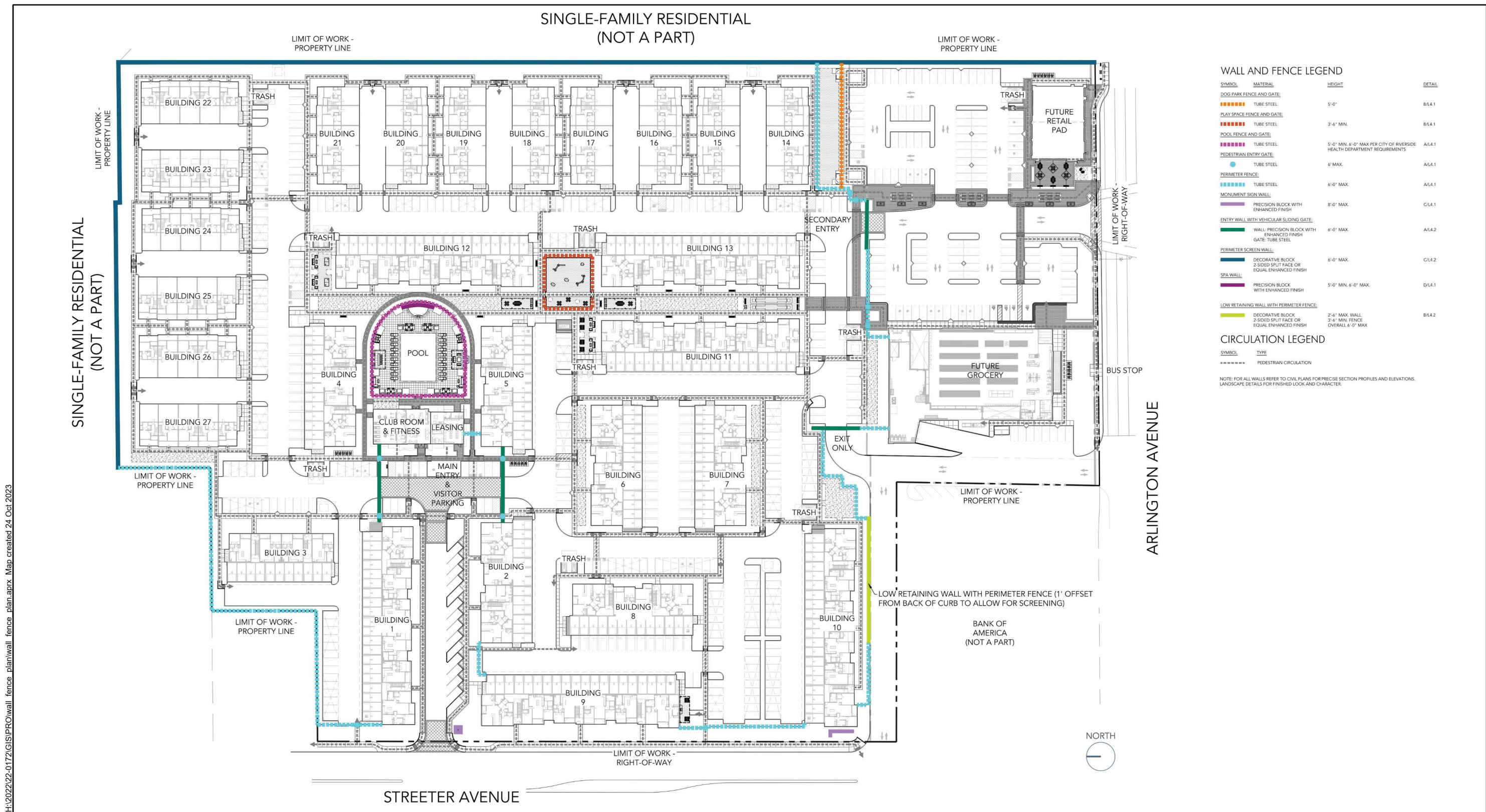


TRADESCANTIA

Source: Architects Orange Mar 29, 2023.

Figure 1.0-26 Plant Palette [2 of 2]  
Arlington Mixed Use





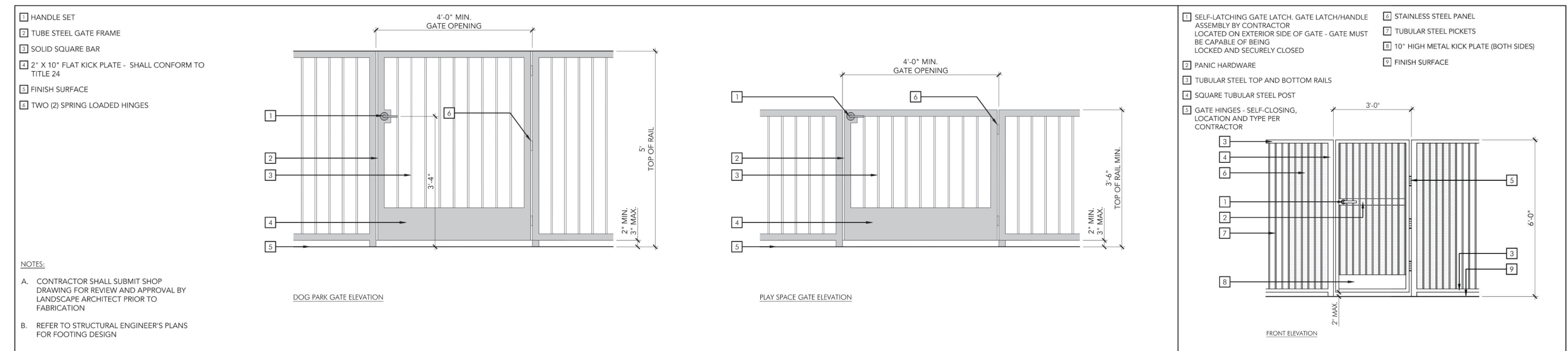
H:\2022\22-0172\GIS\PRO\wall\_fence\_plan.aprx Map created 24 Oct 2023

Source: Architects Orange July 24, 2023.

NTS

**Figure 1.0-27 Wall and Fence Plan**  
Arlington Mixed Use

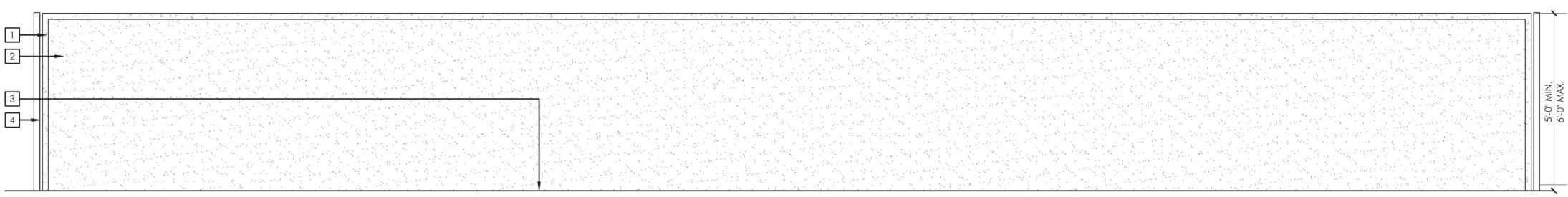




**B DOG PARK & PLAY SPACE VINYL COATED FENCE & GATE**

3/4" = 1'-0"

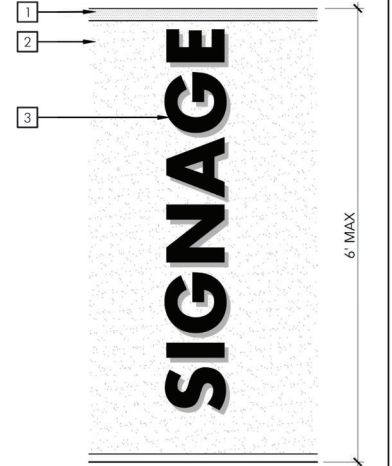
- 1 DECORATIVE WALL CAP
- 2 STUCCO FINISH
- 3 SPA COPING
- 4 ADJACENT POOL FENCE - SEE CONCEPT DETAIL



**A TUBE STEEL FENCE AND GATE**

1/2" = 1'-0"

- 1 PRECAST WALL CAP
- 2 ENHANCED MATERIAL TBD- FINISH AND COLOR TO MATCH ARCHITECTURE
- 3 SIGNAGE - FUTURE PLANS BY SIGNAGE CONSULTANT



**D SPA FOUNTAIN WALL**

1/2" = 1'-0"

**C MONUMENT SIGN WALL**

3/4" = 1'-0"

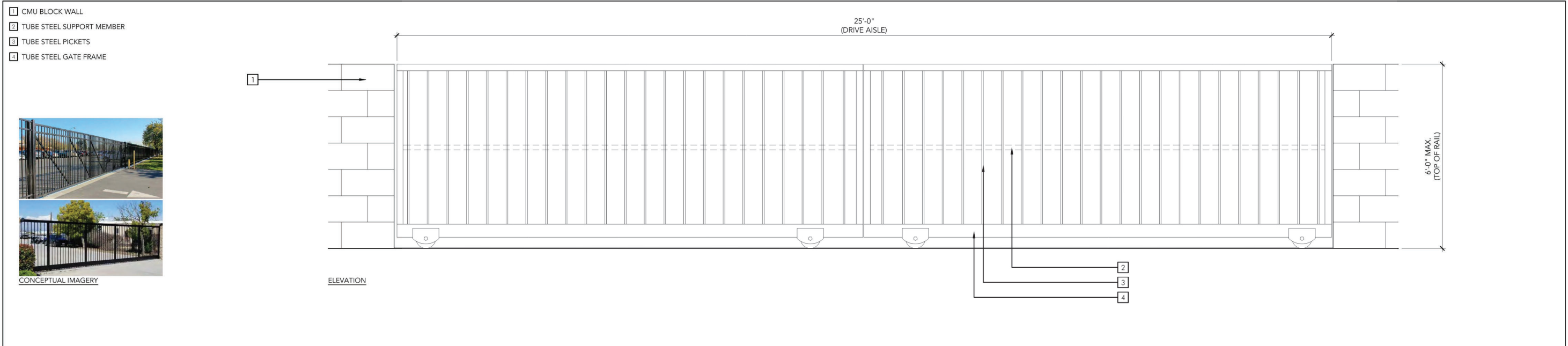
H:\2022\22-0172\GIS\PRO\wall\_fence\_plan.aprx Map created 24 Oct 2023

Source: Architects Orange July 24, 2023.

**Figure 1.0-28 Wall and Fence Details [1 of 2]**  
Arlington Mixed Use



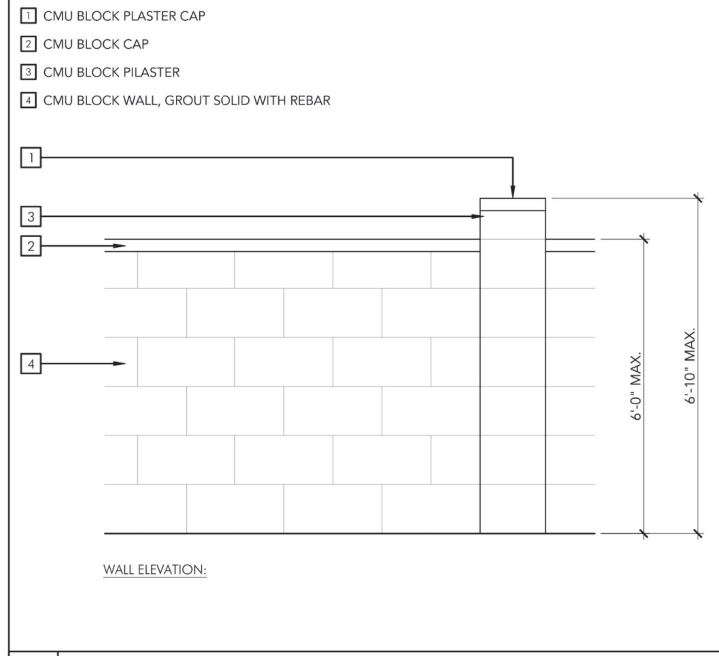
H:\2022\22-0172\GIS\PRO\wall\_fence\_plan.aprx Map created 24 Oct 2023



**A ENTRY WALL AND VEHICULAR GATE**

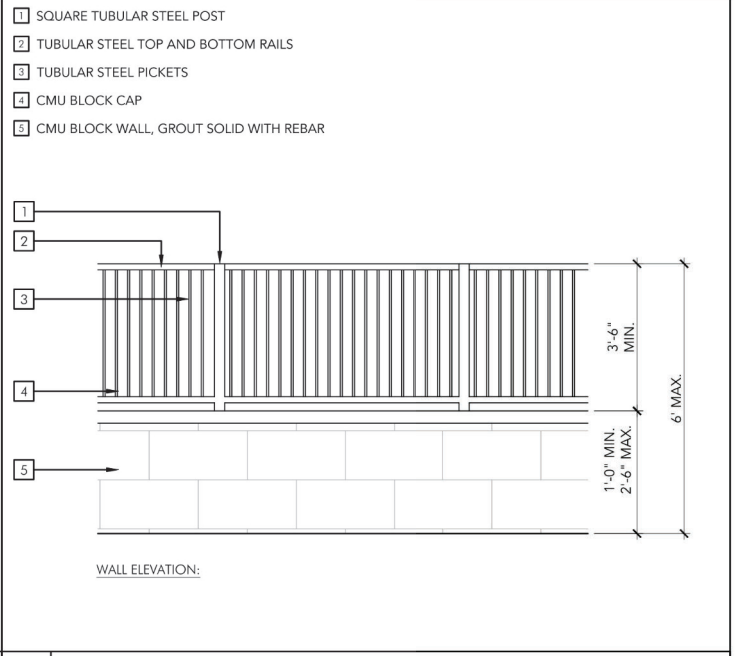
P-20-121-01-04

3/4" = 1'-0"



**C BLOCK WALL**

P-20-121-01-05  
1/2" = 1'-0"



**B BLOCK WALL & PERIMETER FENCE**

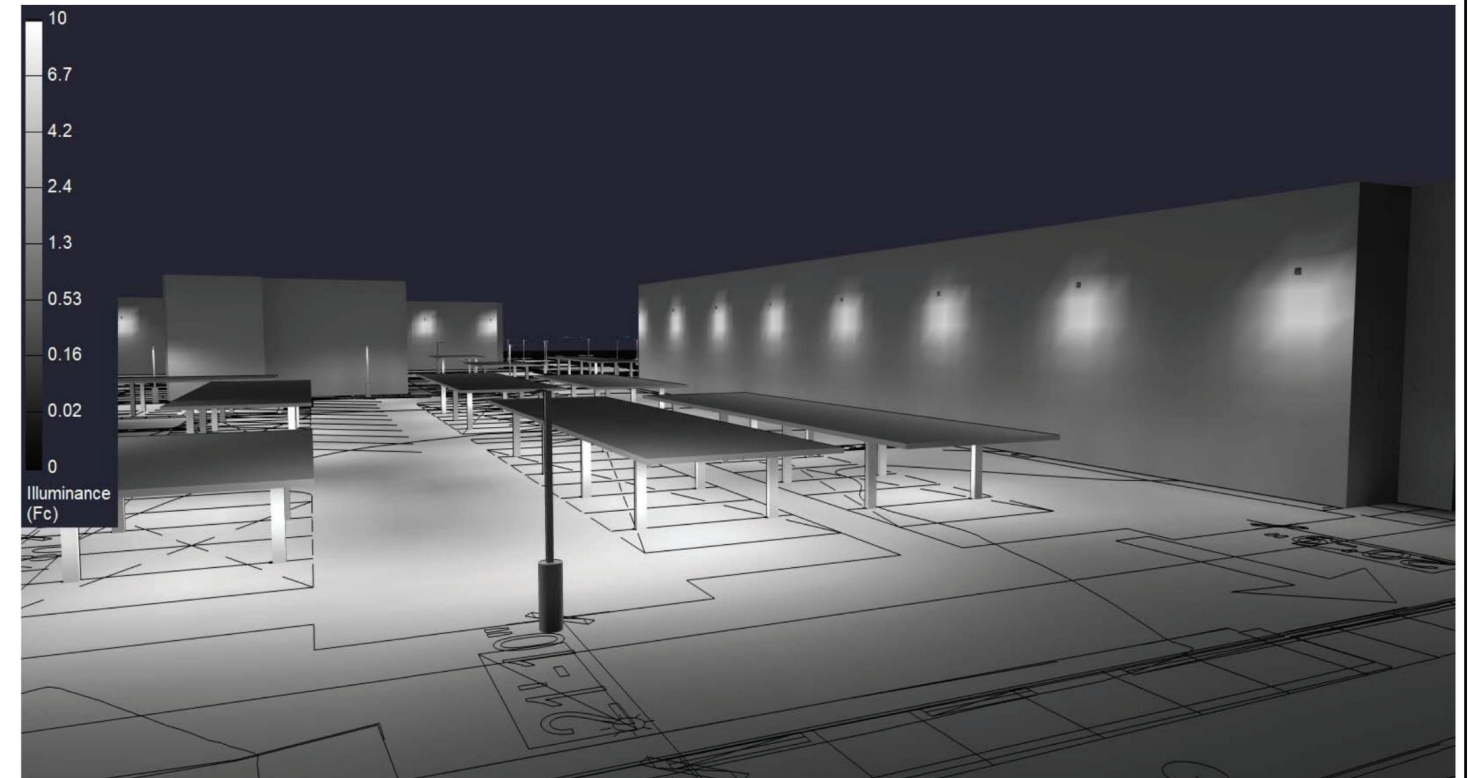
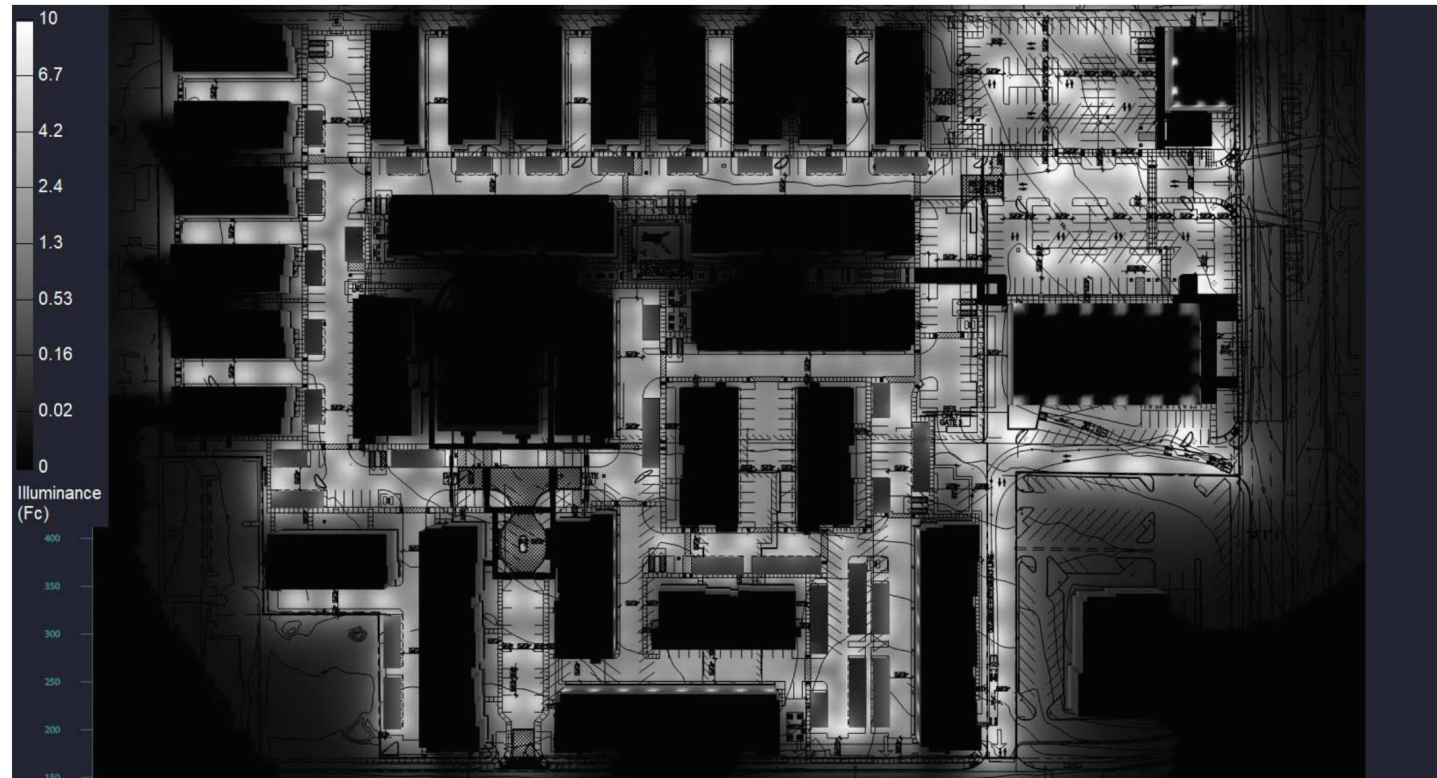
P-20-121-01-01  
1/2" = 1'-0"

Source: Architects Orange July 24, 2023.

**Figure 1.0-29 Wall and Fence Details [2 of 2]**  
Arlington Mixed Use



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Top View : Grayscale Rendering

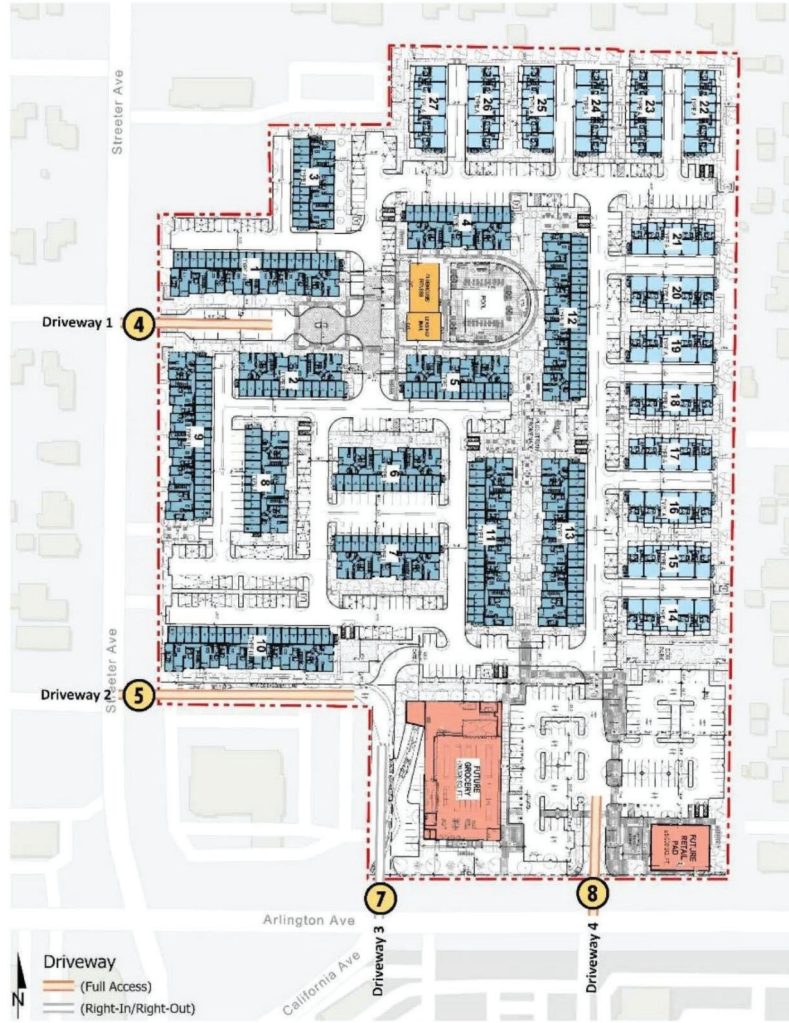
Canopy Isometric View : Grayscale Rendering

Source: RAB Riverside Development, Nov 8, 2022.

NTS

**Figure 1.0-30 Proposed Lighting Plan**  
Arlington Mixed Use

H:\2022\22-0172\GIS\PRO\Prop\_transp\_improv\Prop\_transp\_improv.aprx Map created 30 Oct 2023



4	Streeter Av. & Granada Av.	5	Streeter Av. & El Molino Av.	7	California Av. & Arlington Av.	8	Driveway & Arlington Av.

- = Traffic Signal
- = Stop Sign Improvement
- = Existing Stop Sign
- = Existing Lane
- = Lane Improvement

Source: Arlington Mixed Use Traffic Analysis, Oct. 18, 2023.

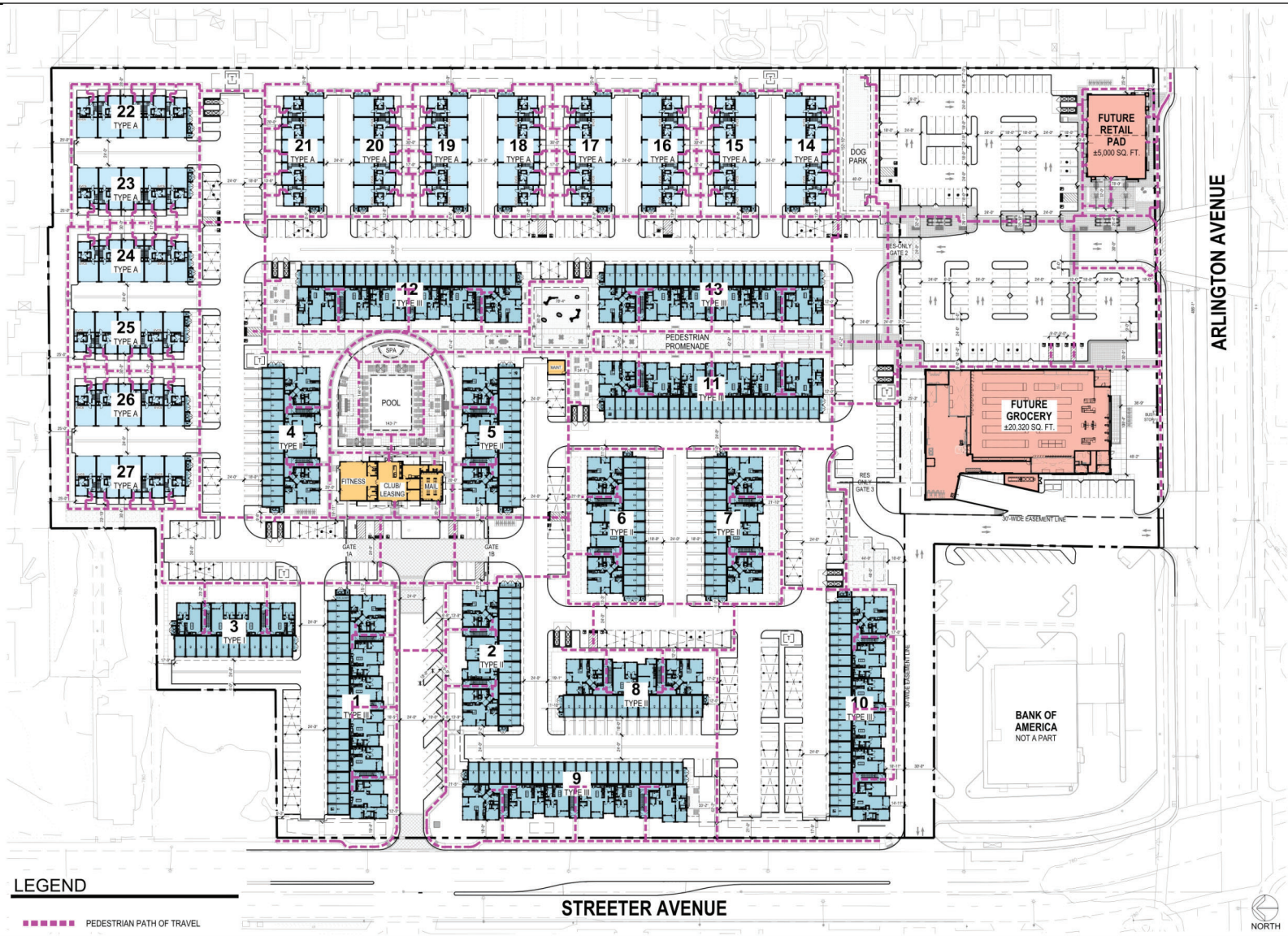
**Figure 1.0-31 Proposed Transportation Improvements**

Arlington Mixed Use

NTS



H:\2022\22-0172\GIS\PROJECT2\Arlington Mixed Use.aprx Map created 24 Oct 2023



Source: Architects Orange June 15, 2023.

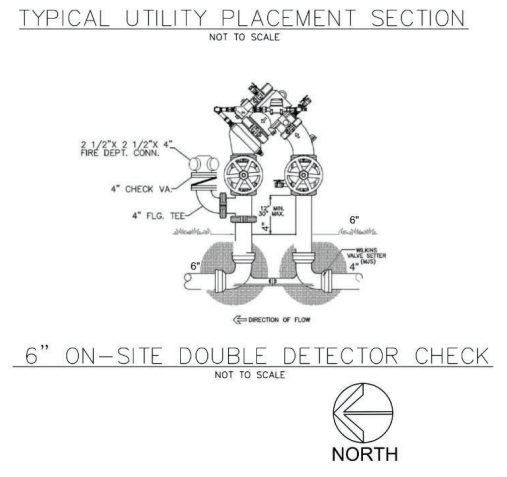
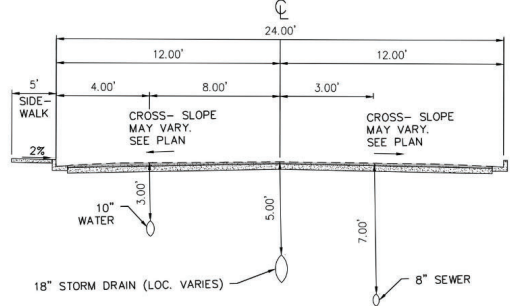
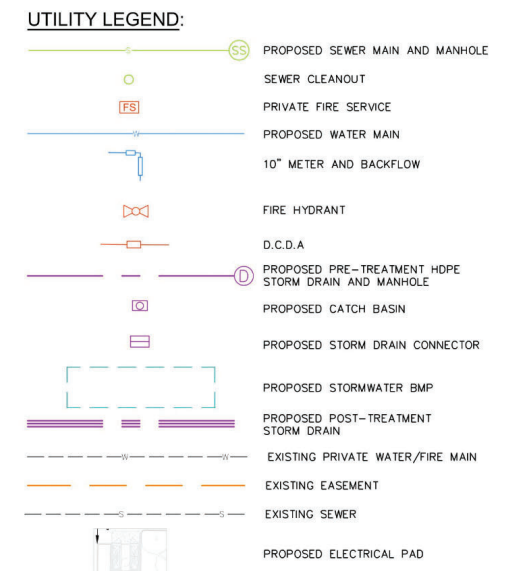
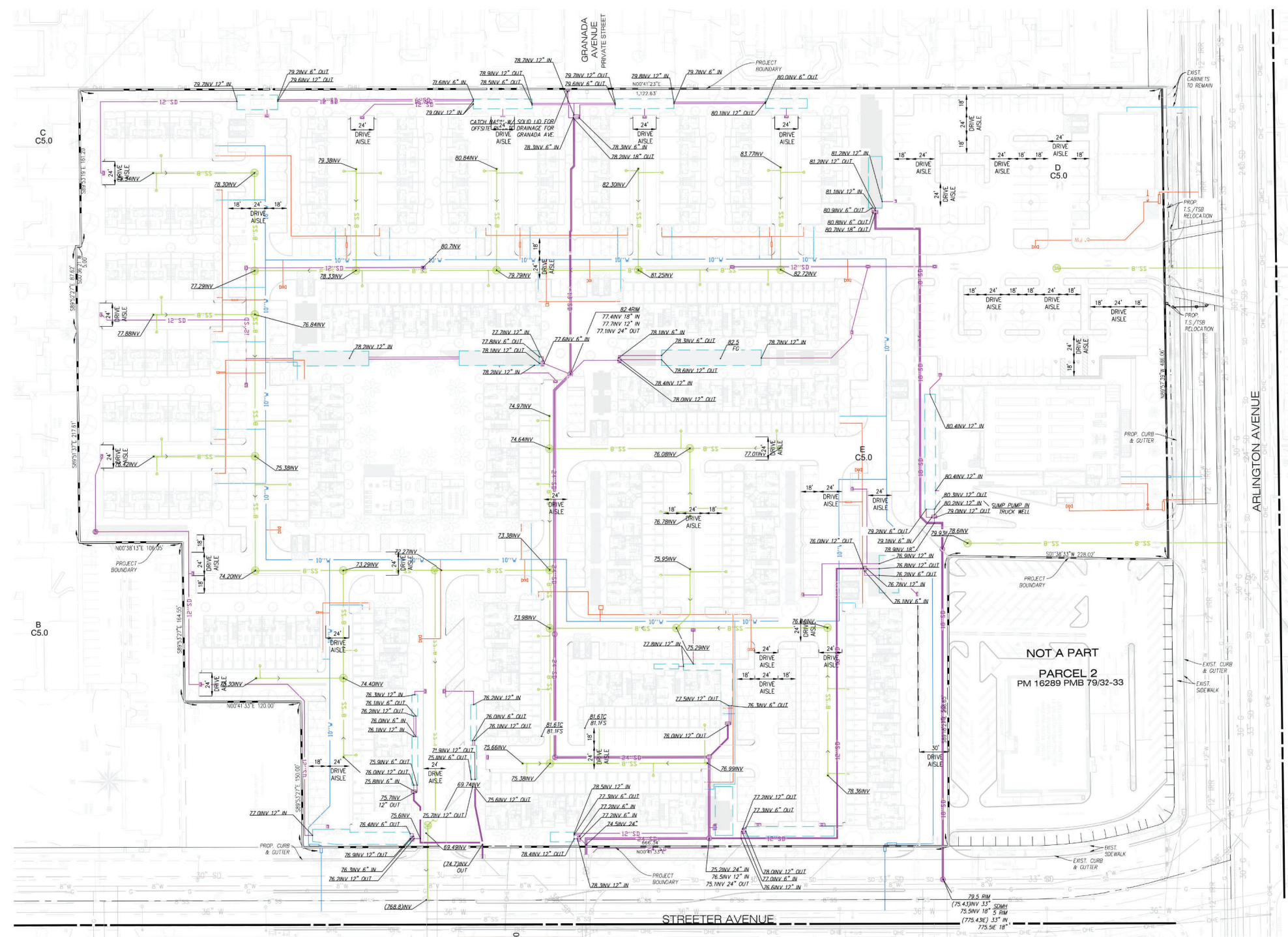
**Figure 1.0-32 Pedestrian Circulation**

Arlington Mixed Use

NTS



H:\2022\02-0172\GIS\PRO\utility\_plan.aprx Map created 27 Jun 2023



- NOTES:**
1. ONSITE SEWER MAINS TO BE INSTALLED PER PUBLIC WORKS STANDARDS. LATERALS AND BUILDING CONNECTIONS PER CURRENT CPC.
  2. ONSITE PRIVATE FIRE SYSTEM AND HYDRANT LOCATIONS PER CITY FIRE DEPARTMENT.
  3. ONSITE PRIVATE DOMESTIC WATER PER CITY WATER DEPARTMENT.
  4. DOMESTIC WATER LATERALS FROM ONSITE PRIVATE WATER MAINS TO BUILDINGS PER CURRENT CPC WITH SUBMETERING AS REQUIRED.

Source: Architects Orange Aug 5, 2022.

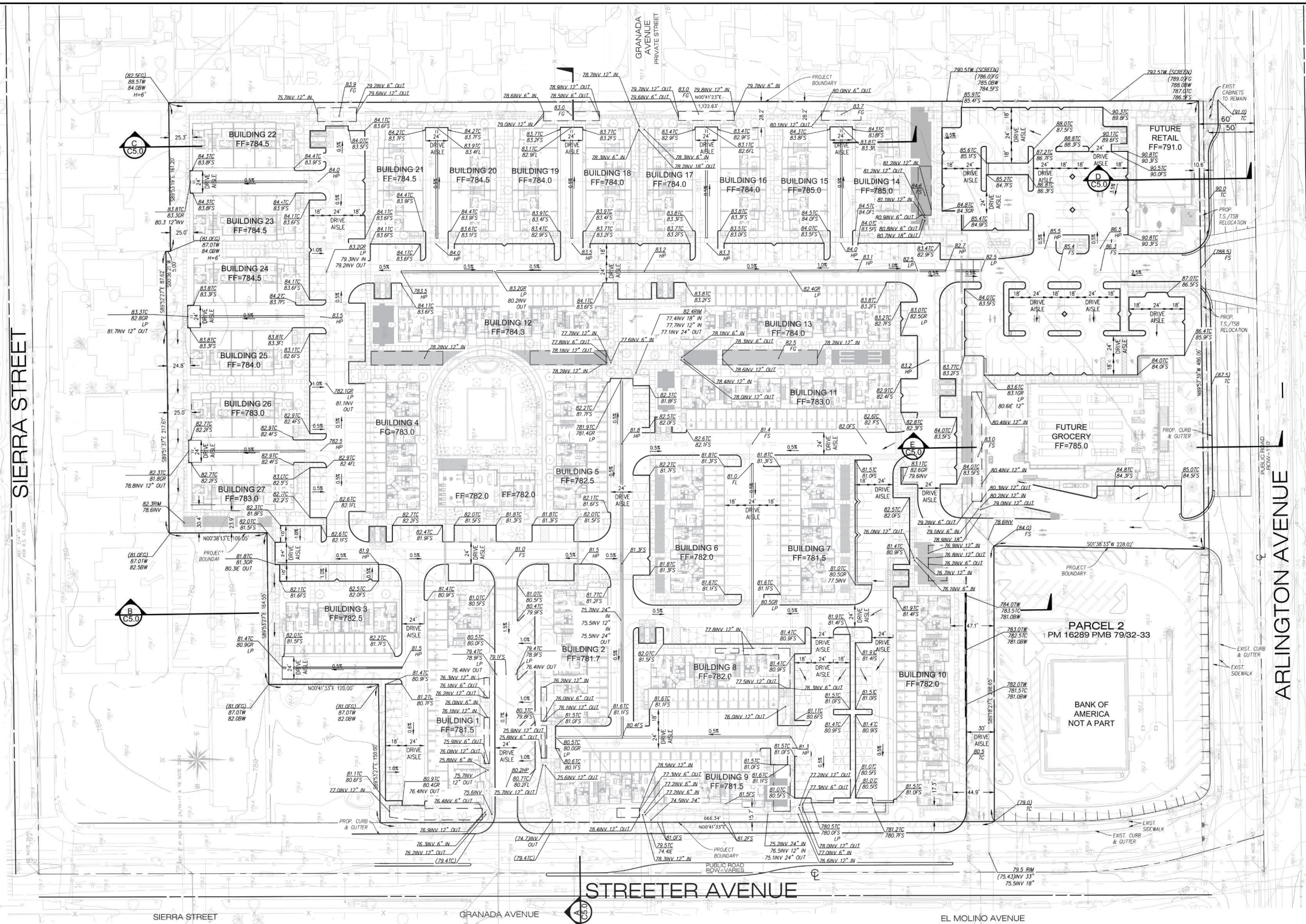
Figure 1.0-33 Existing and Proposed Utility Plan  
Arlington Mixed Use

NTS





H:\2022\22-0172\GIS\PRO\grading\_drainage.aprx Map created 27 Jun 2023



**LEGEND:**

PROPOSED STORMWATER BMP

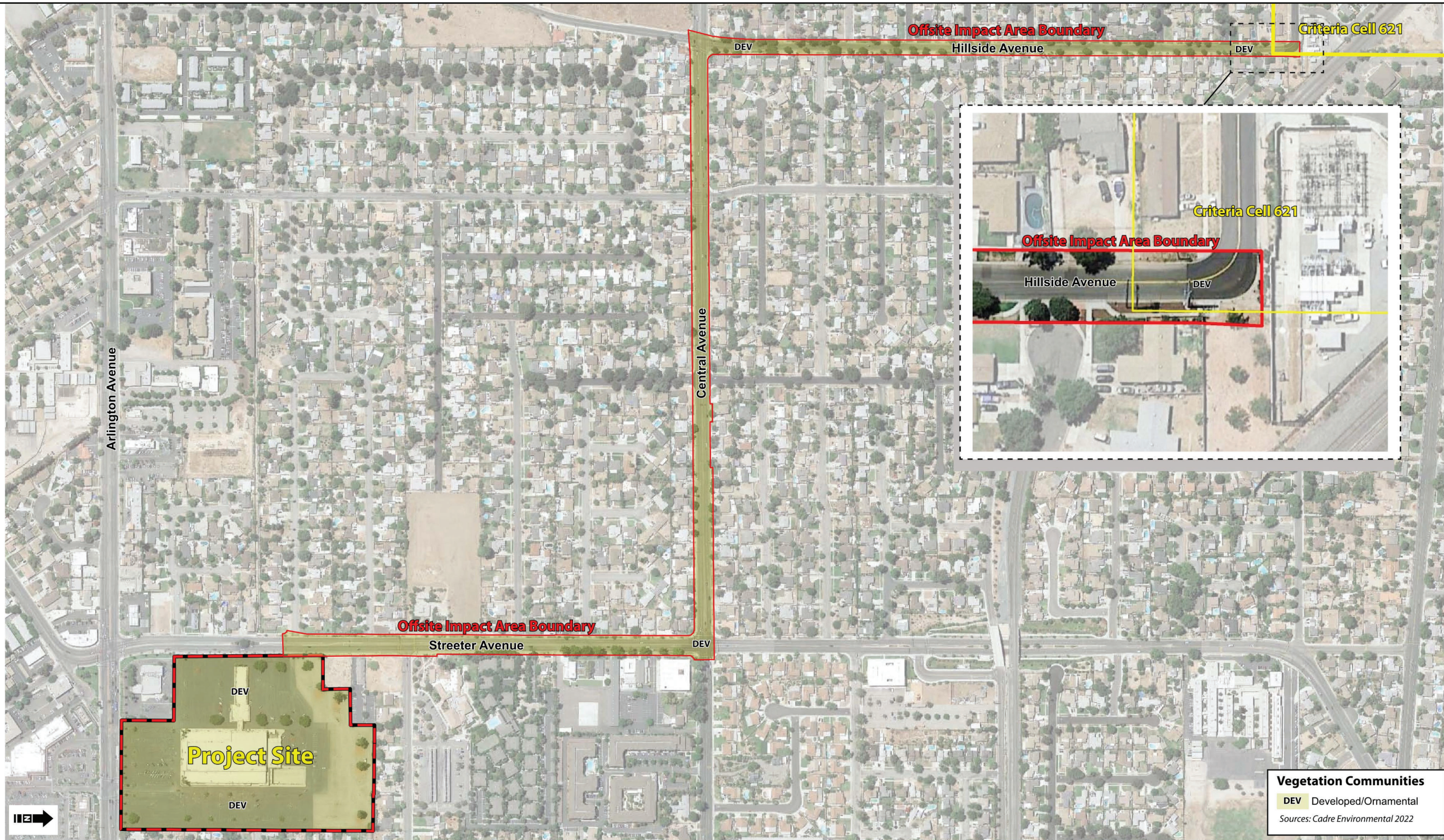
Source: Architects Orange Aug 5, 2022.

**Figure 1.0-34 Proposed Drainage and Grading Plan**  
Arlington Mixed Use

NTS



H:\2022\02-0172\GIS\PRO\off-site bio\_resources.aprx Map created 05 Jul 2023



APN 226-180-015 and Right-of-Way

Project Site (Permanent Impact Area)
  Offsite (Temporary Impact Area)

**Vegetation Communities**

DEV Developed/Ornamental

Sources: Cadre Environmental 2022

Source: CADRE Environmental May, 2023.

**Figure 1.0-35 Offsite Biological Resources**  
Arlington Mixed Use

NTS



## 1.1 Areas of Controversy and Issues to be Resolved

An Initial Study was prepared by the City of Riverside Planning Department to assess the Project's potential to result in significant environmental impacts. A Notice of Preparation (NOP), which included the Initial Study, was circulated to 32 responsible agencies and interested parties. A notice advising of the availability of the NOP was posted by the Riverside County Clerk from June 14, 2023. The NOP was posted at the California State Clearinghouse on June 15, 2023.

In accordance with Section 15082(c)(1) and Section 15083 of the CEQA Guidelines, a public virtual scoping meeting was held on July 12, 2023 between 6:00 p.m. – 7:00 p.m. via zoom. One member from the public attended this scoping meeting but provided no comments.

Copies of the NOP (including the Initial Study) and NOP distribution list are located in Appendix A. Copies of comments regarding the NOP received by the City of Riverside Planning Department are also included in Appendix A.

By the close of the 30-day public review period on July 14, 2023, three responses to the IS/NOP were received. Comments in response to the IS/NOP were received from the following:

- Beverly Phillips
- Inland Empire Biking Alliance
- Native American Heritage Commission

In accordance with Section 15123(b)(2) of the State *CEQA Guidelines*, areas of controversy known to the Lead Agency including issues raised by agencies and the public shall be identified in the EIR. Section 15123(b)(3) of the State *CEQA Guidelines* requires that an EIR identify issues to be resolved. The thresholds used to determine whether or not effects are significant are included in the "Thresholds of Significance" section for each topic discussion in this EIR.



## 1.2 Summary of Environmental Impacts

The following table, **Table 1.0-E, Draft EIR Impact Summary Matrix/Mitigation Monitoring Program**, provides a summary of impacts related to the proposed project. The table identifies significant environmental impacts resulting from the project pursuant to the State CEQA Guidelines Section 15123(b)(1).

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
<b>IMPACT Category: Aesthetics</b>				
In a non-urbanized area, would the proposed Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? In an urbanized area, would the proposed Project conflict with applicable zoning and other regulations governing scenic quality?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
<b>IMPACT Category: Air Quality</b>				
Would the Project conflict with or obstruct implementation of the applicable air quality plan?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the project expose sensitive receptors to substantial pollutant concentration?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
<b>IMPACT Category: Biological Resources (Mitigation Measures brought in from Initial Study)</b>				
Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or	<b>MM BIO-1: Nesting Birds.</b> Prior to issuance of grading, should tree and/or vegetation removals be required during the nesting/breeding season (between February 1st and August 31st.), a pre-removal nesting bird survey shall be required. If	No more than 3 days prior to initiation of grading	Developer / Biologist	Less Than Significant

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
U.S. Fish and Wildlife Service?	<p>construction is proposed a qualified biologist shall conduct a nesting bird survey(s) no more than three (3) days prior to initiation of grading to document the presence or absence of nesting birds within or directly adjacent (100 feet) to the Project Site. The survey(s) shall focus on identifying any raptors and/or bird nests that are directly or indirectly affected by construction activities. If active nests are documented, species specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of a nest shall be postponed until the young birds have fledged. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted to the City of Riverside for review and approval prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. A final monitoring report of the findings, prepared by a qualified biologist, shall be submitted to the City of Riverside documenting</p>			



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	compliance with the CDFG Code. Any nest permanently vacated for the season shall not warrant protection pursuant to the CDFG Code.			
Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	See <b>MM BIO-1</b> above	See <b>MM BIO-1</b> above	See <b>MM BIO-1</b> above	Less than significant
<b>IMPACT Category: Cultural Resources (Mitigation Measures MM CR-5 brought in from Initial Study)</b>				
<p>Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?</p> <p><i>The Project would result in significant Project and Cumulative impacts to Cultural Resources.</i></p>	<p><b>MM CR-1: Historical Resources.</b>                      Prior to the demolition or rehabilitation of the existing structures on the Project parcel, the City shall ensure preparation of Historic American Building Survey (HABS) Level I or Short Format-like documentation in accordance with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation. All work shall be conducted by an architectural historian who meets the Secretary of the Interior’s Professional Qualifications Standards for architectural history and/or history. The HABS-like documentation shall follow the guidelines set forth by the National Park Service (NPS) for HABS I or Short Format documentation. The HABS-like document shall include:</p> <ul style="list-style-type: none"> <li>▪ Black and white photographs with large-format negatives of exterior and interior views (10 views minimum);</li> <li>▪ Photograph Index;</li> <li>▪ Photocopies with large-format negatives of select, existing</li> </ul>	Prior to demolition or rehabilitation	Developer / City	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>drawings or historic views that are produced in accordance with the U.S. Copyright Act; and</p> <ul style="list-style-type: none"> <li>▪ Full-length historical report, as outlined in the Guidelines for Architectural and Engineering Documentation in the Federal Register (68 FR 43159).</li> </ul> <p>Large format photography shall be completed prior to issuance of any project related permitting or construction. Photographic documentation of the existing structures on the Project parcel shall be prepared to the National Park Service’s HABS standards. A minimum of ten (10) views should be recorded, including views of the overall site and landscaping context as well as detailed views of each elevation of existing structures. HABS standards require large-format black-and-white photography, with the original negatives having a minimum size of 4 inches by 5 inches. The photographer shall be familiar with the recordation of historical resources in accordance with HABS guidelines, and digital photography, roll film, and manipulation of images are not acceptable. Photographs shall include a photo index, and field notes, and be identified and labeled using HABS standards outlined in National Park Service’s guidelines Preparing HABS/HAER/HALS Documentation - Transmittal Guidelines.</p> <p>A draft laser copy (or digital PDF) of</p>			



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>the finished photographs formatted to the photo index shall be reviewed and approved by a historic preservation program staff member with City of Riverside prior to final archival prints being made. A copyright release form signed by the photographer releasing copyright of the large format photographs into the public domain for public benefit shall be required with the deliverables. One original copy of the final HABS-like documentation packet shall be offered to the following entities:</p> <ul style="list-style-type: none"> <li>▪ City of Riverside Historic Preservation Program (administered through the Historic Preservation, Neighborhoods and Urban Design Division of the Community Development Department);</li> <li>▪ Riverside Public Library;</li> <li>▪ Riverside Historical Society; and</li> <li>▪ Riverside Metropolitan Museum.</li> </ul>			
<p>Would the Project cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5?</p>	<p><b>MM CR-2: Archaeological Resources – Inadvertent Finds.</b>                      The applicant/owner/developer will retain a qualified archaeological principal investigator, as defined above, to assess information available (final grading and construction plans, geotechnical testing results, as-built plans, etc.) and determine the depth at which native soils exist and would be impacted by project implementation. The depth of native soils shall be included in the Plan so</p>	<p>Prior to issuance of grading plans</p>	<p>Developer / Archaeologist</p>	<p>Less than significant</p>

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>as to guide when cultural (archaeological and Native American) monitoring is appropriate. Impacts to cultural resources shall be minimized through implementation of pre- and post- construction tasks. Tasks pertaining to cultural resources include the development of a Cultural Resource Monitoring and Inadvertent Discovery Plan (Plan). The purpose of the Plan is to outline a program of monitoring occurrence as well as treatment and mitigation in the case of an inadvertent discovery of cultural resources during ground-disturbing phases (including but not limited to preconstruction site mobilization and testing, grubbing, removal of soils for remediation, construction ground disturbance, construction grading, trenching, and landscaping) and to provide for the proper identification, evaluation, treatment, and protection of any cultural resources throughout the duration of the Project. This Plan should define the process to be followed for the identification and management of cultural resources in the Project site during construction. The existence of and importance of adherence to this Plan should be stated on all Project site plans intended for use by those conducting the ground disturbing activities. The Plan will also include the conditions under which Native American and archaeological monitoring is required pursuant to <b>MM CR-4</b>, below, and the</p>			



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>manner of facilitation.</p> <p><b>MM CR-3: Archaeological Resources - Preparation of a WEAP.</b>                      Prior to commencement of construction activities for all phases of Project implementation, the project applicant/owner/developer shall retain a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City for review and approval. All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the WEAP training is to provide specific details on the kinds of cultural materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources, tribal cultural resources, or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site</p>	<p>Prior to construction activities</p>	<p>Developer / Archaeologist</p>	<p>Less than significant</p>

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>supervisor, tribal monitor and archaeologist retained for the Project.</p> <p><b>MM CR-4: Archaeological Resources – Monitoring.</b>                      A qualified archaeologist shall be retained to be present during initial ground disturbance. Initial ground disturbance is defined as the removal of the upper two to eight feet below ground of existing soil. The timing of when cultural resource monitoring (archaeological and Native American) shall be required shall be outlined in the Cultural Resource Monitoring and Inadvertent Discovery Plan pursuant to <b>MM CR-2</b>. More than one monitor may be required if multiple areas within the Project site are simultaneously exposed to initial ground disturbance causing monitoring to be hindered by the distance (more than 200 feet apart) of the simultaneous activities. A qualified archaeological principal investigator, meeting the Secretary of the Interior’s Professional Qualification Standards, shall oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor will be responsible for maintaining daily monitoring logs.</p> <p>In the event that potential prehistoric or historical archaeological resources (sites, features, or artifacts) are</p>	<p>During initial ground disturbance</p>	<p>Developer / Archaeologist</p>	<p>Less than significant</p>



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop and a qualified archaeologist must be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, data recovery, or monitoring may be warranted. If Native American resources are discovered or are suspected, each of the consulting tribes for the Project will also be notified.</p> <p>An archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance and submitted to the City for review. This report shall document compliance with approved mitigation, all implemented monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the City and the EIC</p>			
	<p><b>MM CR-5: Human Remains.</b>                      If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are</p>	<p>In the event of discovery</p>	<p>Developer / Archaeologist</p>	<p>Less than significant</p>

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the “most likely descendant”. The “most likely descendant” shall then make recommendations and engage in consultations concerning the treatment of the remains.</p> <p><i>(This mitigation measure was identified as MM CR-1 in the Initial Study. This mitigation measure has been renumbered to MM CR-5 for purposes of inclusion in the Project’s Mitigation Monitoring and Reporting Program).</i></p>			
<p>Would the Project disturb any human remains, including those interred outside of formal cemeteries?</p>	<p>See <b>MM CR-5</b> above (From Initial Study)</p>	<p>See <b>MM CR-5</b> above</p>	<p>See <b>MM CR-5</b> above</p>	<p>Less Than Significant</p>
<p><b>IMPACT Category: Energy</b></p>				
<p>Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation??</p>	<p><i>Mitigation not required</i></p>	<p><i>Not applicable</i></p>	<p><i>Not applicable</i></p>	<p>Less Than Significant <i>Mitigation not required</i></p>
<p>Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency??</p>	<p><i>Mitigation not required</i></p>	<p><i>Not applicable</i></p>	<p><i>Not applicable</i></p>	<p>Less Than Significant <i>Mitigation not required</i></p>
<p><b>IMPACT Category: Geology and Soils (Mitigation Measures brought in from Initial Study)</b></p>				
<p>Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p><b>MM GEO-1: Paleontological Resources Impact Mitigation Program and Paleontological.</b> Prior to issuance of grading permit, the Project proponent shall retain a</p>	<p>Prior to Grading Permit</p>	<p>Developer / Paleontologist</p>	<p>Less Than Significant</p>



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The qualified paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project that shall be consistent with the SVP (2010) guidelines and outline requirements for preconstruction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the Project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for micro invertebrate and micro vertebrate fossils), reporting, and collections management. A qualified paleontological monitor shall be on the Project site during initial rough grading and other significant ground-disturbing activities (including augering) in areas underlain by Pleistocene alluvial deposits and below a depth of five feet below the ground surface in areas underlain by Holocene alluvium to determine if they are old enough to preserve scientifically significant paleontological resources. No paleontological monitoring shall be necessary during ground disturbance within artificial fill. In the event that paleontological resources (e.g., fossils) are unearthed during grading,</p>			

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor shall allow grading to recommence in the area of the find.</p>			
<b>IMPACT Category: Greenhouse Gas</b>				
<p>Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</p> <p><i>The Project would result in significant Project and Cumulative impacts to Greenhouse Gas.</i></p>	<p><b>MM GHG-1: Commute Trip Reduction.</b> Upon a residential dwelling unit being rented, the Project Applicant or its designee shall notify and offer to the prospective tenant, as soon as it may be done, disclosure materials describing available public transit, ridesharing and non-motorized commuting opportunities available in the vicinity of the Project. Such information shall be transmitted no later than the finalization of a rental contract. A draft of this disclosure shall be submitted to the City of Riverside Planning Division for review prior to the issuance of the certificate of occupancy.</p>	<p>Prior to Occupancy</p>	<p>Residential property owner and/or property management firm</p>	<p>Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval</p>
	<p><b>MM GHG-2: Telecommute.</b> The Project Applicant or its designee shall install broadband infrastructure or other communication technologies that encourage telecommuting and working from home. The Project Applicant or its designee shall submit documentation to the City Building and Safety Division prior to</p>	<p>Prior to Occupancy</p>	<p>Developer</p>	<p>Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval</p>

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>occupancy.</p> <p><b>MM GHG-3: Unbundle Residential Parking Costs.</b> The Project Applicant or its designee shall provide information to the residential property owner and/or property management firm about the benefits of providing unbundled, or separate, residential parking costs from property costs for rental units, which allows those who wish to purchase parking spaces to do so at an additional cost. Unbundled parking costs may decrease vehicle ownership and, therefore, result in a reduction in VMT and GHG emissions. The Project Applicant or its designee shall submit documentation to the City Planning Division prior to occupancy.</p>	Prior to Occupancy	Project Applicant	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval
Would the project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
<b>IMPACT Category: Hazards and Hazardous Materials</b>				
Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment ?	<p><b>MM HAZ-1: Decontamination of Soil.</b> During grading activities at the former UST system area and around one boring location the soil shall be handled and mitigated in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166 (VOC Emissions from Decontamination of Soil) Mitigation Plan. Petroleum impacted soil shall be segregated from non-impacted soil using the convention soil management soil practices. However, petroleum</p>	Prior to issuance of building permit	Developer / Contractor	Less Than Significant



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>impacted soil at greater depths shall remain in place.</p> <p><b>MM HAZ 2: Vapor Barriers.</b> In order to mitigate the past contamination on the site related to the Sears Auto Service Center, the City building department shall ensure that final construction drawings on the Project reflect requirements from the Santa Ana Regional Water Quality Control Board (SARWQCB). Requirements from the SARWQCB could include conventional vapor barriers with passive sub-slab venting incorporated into foundation design of the proposed structures on the Project site.</p>	<p>Prior to issuance of building permit</p>	<p>Developer / Contractor</p>	<p>Less Than Significant</p>
<p>For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? <i>The Project would result in significant Project and Cumulative impacts to Hazards and Hazardous Resources related to Airport land use.</i></p>	<p><b>MM HAZ-3: Airport Noise.</b> Prior to issuance of a building permit for any residential building or unit, an acoustical analysis shall be conducted by a noise specialist meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5 to confirm that the noise insulation proposed in the final design is sufficient to achieve interior noise levels at or below 45 CNEL and exterior noise levels at or below 65 CNEL. Interior noise attenuation measures identified in said acoustical analysis shall be incorporated into the design of the residences, to the extent such measures are necessary, to ensure that interior noise levels are at or below 45 CNEL. Measures may include, but not be limited to, upgraded building façade elements</p>	<p>Prior to issuance of building permit</p>	<p>Developer / Contractor</p>	<p>Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval</p>

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	(windows, doors, and /or exterior wall assemblies) with Sound Transmission Class (STC) rating of 35 or higher. If the interior limit can be achieved only with the windows closed, then the building design shall include mechanical ventilation that meets California Building Code requirements. Exterior noise attenuation measures, which shall be unit/structure specific, may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 CNEL.			
<b>IMPACT Category: Land Use</b>				
<p>Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</p> <p><i>The Project would result in significant Project and Cumulative impacts to Land Use and Planning related to Airport land use policy.</i></p>	<p><i>There is no feasible mitigation measures that can be applied.</i></p>	<p><i>Not applicable</i></p>	<p><i>Not applicable</i></p>	<p>Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval</p>
<b>IMPACT Category: Noise</b>				
<p>Would the Project 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?</p>	<p><b>MM NOI-1: Residential Interior Noise.</b> An interior noise analysis shall be conducted by a Noise specialist. Noise attenuation measures shall be incorporated into the design of the residences as outlined in the interior noise analysis, to the extent such measures are necessary to ensure that interior noise levels are at or below 45 CNEL. Measures shall</p>	<p>Prior to issuance of building permit</p>	<p>Developer / Contractor</p>	<p>Less Than Significant</p>

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	include upgraded building façade elements (windows, doors, and /or exterior wall assemblies) with Sound Transmission Class (STC) rating of 35 or higher. If the interior limit can be achieved only with the windows closed, then the building design shall include mechanical ventilation that meets California Building Code requirements.			
	<b>MM NOI-2: Commercial Exterior Noise.</b> Prior to issuance of a building permit for any commercial structure, an acoustical analysis shall be conducted by a noise specialist meeting the requirements set forth in Riverside Municipal Code section 16.08-175 B 5 to confirm that the noise insulation proposed in the final design is sufficient to achieve exterior noise levels at or below 65 CNEL in any outdoor dining / flex space. Noise attenuation measures identified in said acoustical analysis shall be incorporated into the design of the commercial area, to the extent such measures are necessary, to ensure that exterior noise levels are at or below 65 CNEL. Exterior noise attenuation measures, which shall be specific to the ultimate location of the outdoor dining / flex space may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 CNEL.	Prior to issuance of building permit	Developer / Contractor	Less Than Significant
Would the Project result in generation of excessive groundborne vibration or	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
groundborne noise levels?				<i>Mitigation not required</i>
For a project located within the vicinity of a private airstrip of an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise level?	See <b>MM NOI-1</b> and <b>MM NOI-2</b> above.	See <b>MM NOI-1</b> and <b>MM NOI-2</b> above.	See <b>MM NOI-1</b> and <b>MM NOI-2</b> above.	Less Than Significant
<b>IMPACT Category: Population and Housing</b>				
Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
<b>IMPACT Category: Public Services</b>				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>

**Table 1.0-E, DEIR Impact Summary Matrix**

<b>Impact</b>	<b>Mitigation Measure</b>	<b>Implementation Timing</b>	<b>Responsible Party</b>	<b>Impact After Mitigation</b>
objectives for police protection?				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
<b>IMPACT Category: Recreation</b>				
Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
<b>IMPACT Category: Transportation</b>				
Would the Project conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? <i>The Project would result in less than significant Project impacts.</i>  <i>However, Cumulative impacts to Transportation would be significant and unavoidable. Refer to Section 7.0 – Other CEQA.</i>	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Significant and Unavoidable. A Statement of Overriding Considerations is required prior to Project approval
<b>IMPACT Category: Tribal Cultural Resources</b>				
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k)?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	No Impact <i>Mitigation not required</i>
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant	<b>MM TCR-1: Consultation.</b> 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/	Prior to grading permit issuance	Developer / City	Less than significant



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
<p>pursuant to criteria set forth in subdivision (c) of Public Resource Code section 5024.1; in applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?</p>	<p>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.</p>			
	<p><b>MM TCR-2: On call Project Archaeologist.</b> 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 call during all grading and other significant ground-disturbing activities in native sediments.</p>	<p>Prior to grading permit issuance</p>	<p>Developer / Archaeologist</p>	<p>Less than significant</p>
	<p><b>MM TCR-3: Treatment and Disposition of Cultural Resources.</b> 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</p>	<p>In the event of discovery</p>	<p>Developer / Archaeologist</p>	<p>Less than significant</p>

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>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.</p> <p>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 to be thoroughly inventoried with tribal monitor oversight of the process; and</p> <p>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. 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:</p> <p>a) Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall</p>			

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>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;</p> <p>b) A curation agreement with an appropriately qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. 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;</p> <p>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</p> <p>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</p>			



**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	<p>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.</p>			
	<p><b>MM TCR-4: Cultural Sensitivity Training.</b> 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</p>	<p>Prior to grading</p>	<p>Developer /                      Archaeologist /                      Native American                      Monitors</p>	<p>Less than significant</p>

**Table 1.0-E, DEIR Impact Summary Matrix**

Impact	Mitigation Measure	Implementation Timing	Responsible Party	Impact After Mitigation
	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.			
<b>IMPACT Category: Utilities and Service Systems</b>				
Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effect?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>
Would the Project 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?	<i>Mitigation not required</i>	<i>Not applicable</i>	<i>Not applicable</i>	Less Than Significant <i>Mitigation not required</i>

### 1.3 Summary of Project Alternatives

The Project objectives allow for the analysis of reasonable alternatives to the proposed Project. A range of reasonable alternatives, both on- and off-site, that would feasibly attain most of the basic Project objectives, while avoiding or substantially lessening the significant effects of the Project, must be analyzed per *CEQA Guidelines* Section 15126.6, which identifies the parameters within which consideration and discussion of alternatives to a proposed project should occur. Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. The rationale for selecting the alternatives to be evaluated and a discussion of the “no project” alternative are also required, pursuant to Section 15126.6. This Draft EIR evaluates the following Alternatives: 1) No Project/No Demolition/Keep Existing Commercial Designation Alternative 2) Adaptive Reuse Alternative, 3) ALUC Consistent Alternative, and 4) Reduced Density/Intensity Alternative.

**Table 1-F, Comparison of Alternatives Matrix**, gives a summary of all Project alternatives considered in detail in the Draft EIR and identifies the areas of potential environmental effects per CEQA and ranks each alternative as less, same, or greater than the proposed Project with respect to each area.

**Table 1.0-F, Comparison of Alternatives Matrix**

<b>Environmental Issue</b>	<b>Alternative 1: No Development/Keep Existing Commercial Designation</b>	<b>Alternative 2: Adaptive Reuse to Residential</b>	<b>Alternative 3: ALUC Consistency</b>	<b>Alternative 4: Reduced Density/Intensity</b>
<b>Cultural Resources</b> <i>Project and Cumulative</i>	<b>Same</b> – Alternative would not require the demolition of the existing structures. However, modifications to the structures would still be required to bring them into compliance with current building and seismic codes to a degree that would not result in the preservation of a historic resource Therefore, impacts related to cultural resources would be similar to that of the proposed Project.	<b>Same</b> – Alternative would still require modifications to a degree that would not result in the preservation of a historic resource. Therefore, cultural resource impacts would be the same as the proposed Project.	<b>Same</b> – Alternative would still require demolition of historic resources. Therefore, cultural resource impacts would be similar to the proposed Project.	<b>Same</b> – Alternative would still require demolition of historic resources. Therefore, cultural resource impacts would be similar to the proposed Project.
<b>Greenhouse Gas Emissions</b>	<b>Greater</b> – The fully commercial use of the site	<b>Less</b> – the uses under this Alternative would most likely	<b>Less</b> – the uses under this Alternative would most likely	<b>Same</b> – although the residential and commercial



**Table 1.0-F, Comparison of Alternatives Matrix**

<b>Environmental Issue</b>	<b>Alternative 1: No Development/Keep Existing Commercial Designation</b>	<b>Alternative 2: Adaptive Reuse to Residential</b>	<b>Alternative 3: ALUC Consistency</b>	<b>Alternative 4: Reduced Density/Intensity</b>
<i>Project and Cumulative</i>	under Alternative 1 would increase the GHG emissions and further exceed thresholds.	not result in GHG emissions that would exceed standards.	not result in GHG emissions that would exceed standards.	uses would be reduced by this Alternative, there would still be uses to generate mobile source and other emissions that would most likely exceed thresholds.
<b>Hazards and Hazardous Material</b> <i>Project and Cumulative</i>	<b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP. Therefore, hazards/hazardous material impacts would be the same as the proposed Project.	<b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP. Therefore, hazards/hazardous material impacts would be the same as the proposed Project.	<b>Same</b> – Alternative would propose uses consistent with RCALUCP development standards. As such, this Alternative would be consistent with RCALUCP policies. However, use may not be compatible with existing surrounding sensitive receptors. Therefore, hazards /hazardous material impacts would be similar to the proposed Project.	<b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP. Therefore, hazards/hazardous material impacts would be the same as the proposed Project.
<b>Land Use</b> <i>Project and Cumulative</i>	<b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP and as such, inconsistency with General Plan land use objectives and policies as they relate to airports. Therefore, land use and planning impacts would be the same as the proposed Project.	<b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP and as such, inconsistency with General Plan land use objectives and policies as they relate to airports. Therefore, land use and planning impacts would be the same as the proposed Project.	<b>Same</b> – Alternative would propose uses consistent with RCALUCP development standards. Because this Alternative would be consistent with the RCALUCP, it would not result in inconsistencies with General Plan land use objectives and policies as they relate to airports.	<b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP and as such, inconsistency with General Plan land use objectives and policies as they relate to airports. Therefore, land use and planning impacts would be the same as the proposed Project.

**Table 1.0-F, Comparison of Alternatives Matrix**

Environmental Issue	Alternative 1: No Development/Keep Existing Commercial Designation	Alternative 2: Adaptive Reuse to Residential	Alternative 3: ALUC Consistency	Alternative 4: Reduced Density/Intensity
			However, use may not be compatible with existing surrounding sensitive receptors. Therefore, land use and planning impacts would be similar to the proposed Project.	
<b>Transportation</b> <i>Cumulative</i>	<b>Greater</b> – Under the existing land use, the existing site would generate approximately 1,326 more trips than that of the proposed Project. Thus, this Alternative would result in similar cumulative traffic impacts but Project-specific impacts would be greater than of the proposed Project.	<b>Same</b> – There would be less traffic originating to and from the Project area because of reduced density and intensity. However, cumulative traffic impacts would remain similar to the proposed Project.	<b>Same</b> – There would be less traffic going to and from the Project area because the uses would be less intense. But cumulative traffic impacts would remain similar to the proposed Project.	<b>Same</b> – There would be less traffic originating to and from the Project area because of reduced density and intensity. However, cumulative traffic impacts would remain similar to the proposed Project.
<b>Environmentally Superior to Proposed Project?</b>	<b>No</b>	<b>Yes, but to a lesser degree</b>	<b>Yes, but to a lesser degree</b>	<b>Yes, but impacts similar</b>
<b>Meets Most of the Project Objectives?</b>	<b>No</b> (0 of 5 Objectives Met)	<b>Yes, but to a lesser degree</b> (3 of 5 Objectives Met)	<b>No</b> (0 of 5 Objectives Met)	<b>Yes, but to a lesser degree</b> (5 of 5 Objectives Met)

## 1.4 Environmentally Superior Alternatives

The State *CEQA Guidelines*, Section 15126.6(e)(2), requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, the No Project alternative is the environmentally superior alternative with respect to reducing impacts created by the proposed Project. However, the beneficial impacts of the proposed Project would not be realized. The State *CEQA Guidelines* also require the identification of another environmentally superior alternative if the No Project alternative is selected as the environmentally superior alternative. The following four Alternatives were reviewed for consideration of the environmentally superior alternative.

Alternative 1: No Development/Keep Existing Commercial Designation, results in greater impacts than the proposed Project and does not meet any of the Project Objectives. As such, this Alternative is rejected from consideration.

Alternative 2: Adaptive Reuse, results similar impacts to the proposed Project but overall would result in less impacts than the proposed Project. The uses under this Alternative would most likely not result in GHG emissions that would exceed standards. However, when compared to the proposed Project, this Alternative does not have the ability to lessen impacts to the historic resources so will result in similar impacts to that of the proposed Project. Further, this Alternative meets only 3 of the 5 Project Objectives and to a lesser degree. As such, this Alternative is rejected from further consideration.

Alternative 3: ALUC Consistency, results similar impacts to the proposed Project but overall would result in less impacts than the proposed Project since the uses under this Alternative would most likely not result in GHG emissions that would exceed standards. However, this Alternative does not meet any of the Project Objectives so is rejected from further consideration.

Alternative 4: Reduced Density/Intensity, results similar impacts to the proposed Project and meets all of the Project Objectives but to a lesser degree than the proposed Project because Alternative 4 would reduce the size of the commercial buildings and amount of residential units by approximately 25 percent. As such, this Alternative would still provide more housing than other Alternatives, which is a key objective. Hence, Alternative 4 is the environmentally superior alternative.

While the City of Riverside has examined a reasonable range of alternatives to the proposed Project site, and Alternative 4 meets most of the Project objectives and is considered the environmentally superior alternative to the proposed Project, the degree of which Alternative 4 reduces impacts to GHG emissions and Transportation is minimal when compared to the proposed Project. Since Alternative 4 is proposing to implement residential uses on the site impacts to GHG and Transportation would still exceed existing levels and thus still create an impact.

Alternative 4, when compared to the proposed Project, would meet all of the basic Project Objectives found in Section 3.0 – Project Description of this Draft EIR but to a lesser degree because it fails to maximize the site location and surrounding features through site design and building placement since it offers a reduced density/intensity project; resulting in an increased demand for development at other sites in the area. Further, while this Alternative would capitalize on the City's Smart Growth principals, it would do so to a lesser degree than the proposed Project by offering smaller commercial structures and fewer dwelling units. Lastly, while this Alternative would provide housing opportunities allowing the City to help meet its RHNA allocations, it would do so at a lesser degree than the proposed Project.



Alternative 4 would result in essentially the same level of impacts as the proposed Project but would not meet all of the basic Project Objectives found in Section 3.0 - Project Description of this Draft EIR.

The proposed Project will result in significant and unavoidable impacts even after implementation of mitigation. Likewise, Alternative 4 (as well as Alternatives 1 through Alternative 3) will also result in similar significant unavoidable impacts. Therefore, none of the Alternatives will effectively lessen or avoid significant impacts that otherwise result from the proposed Project.

## 2.0 Introduction

### 2.1 Purpose and Scope

This Draft Environmental Impact Report (DEIR) has been prepared pursuant to the California Environmental Quality Act (CEQA) to assess the potential environmental effects of the Arlington Mixed Use Project (Project); which will increase the density of select property.

The basic purposes of CEQA (*CEQA Guidelines*, Section 15002) are to:

- inform governmental decision makers and the public about the potential significant environmental effects of proposed activities;
- identify the ways that environmental damage can be avoided or significantly reduced;
- prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

### 2.2 Authorization

This DEIR has been prepared by the City of Riverside (City) as “Lead Agency” in accordance with the California Environmental Quality Act (CEQA) (Pub. Res. Code Section 21000 et. seq), the Guidelines for the Implementation of the California Environmental Quality Act (*State CEQA Guidelines*) (Sections 15000–15387 of the California Code of Regulations), and the City’s *CEQA Guidelines*. The proposed Project considered in this DEIR is a “project,” as defined by Section 15378 of the *State CEQA Guidelines*, which states that an EIR must be prepared for any project that may have a significant impact on the environment. The City, as Lead Agency, has determined that the Project may have a significant adverse impact on the environment; therefore, preparation of an EIR was required.

### 2.3 Lead and Responsible Agencies

CEQA defines a “lead agency” as the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment. Other agencies, e.g., South Coast Air Quality Management District (SCAQMD) or the Regional Water Quality Control Board (RWQCB), which also have some authority or responsibility to issue permits for projects, are designated as “responsible agencies.” Both the lead agency and responsible agencies must consider the information contained in the EIR prior to acting upon or approving a project. The City of Riverside is the lead agency for the Project. The City’s address is:

City of Riverside – Community & Economic Development Department  
Planning Division  
3900 Main Street, 3rd Floor  
Riverside, CA 92522  
Contact: Brian Norton, Senior Planner

Entitlement actions to be considered by the City of Riverside as Lead Agency include a General Plan Amendment, Rezone, Site Plan Review, and Tentative Parcel Map as described in Section 3.0 - Project Description of this DEIR.

Responsible agencies for the Project include, but may not be limited to the following:

- Federal Agencies
  - None
- State Agencies
  - None
- Regional Agencies
  - State Water Resources Control Board
- City/Counties Agencies
  - Riverside County Airport Land Use Commission
  - Western Riverside County Regional Conservation Authority

## 2.4 Project Applicant

The Project Applicant is:

Riverside Property Owner, LLC  
12435 Park Potomac Avenue, Suite 200  
Potomac, MD 20854  
Contact: Jamie Chapman

## 2.5 CEQA Procedures

The basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved. (State CEQA Guidelines, Section 15002)

### 2.5.1 Environmental Procedures

The EIR process typically consists of three parts: 1) the Notice of Preparation (NOP) including an Initial Study (IS) if applicable, 2) Draft EIR (DEIR), and 3) Final EIR (FEIR). Pursuant to Section 15063 of the State *CEQA Guidelines*, the City prepared an Initial Study for the Project in order to determine if the Project may have a significant effect on the environment. Based upon the analysis contained within the Initial Study, the City concluded that the Project may cause potentially significant impacts and that an EIR should be prepared.

This document provides for the DEIR stage of the EIR process. As the "Lead Agency" for the purposes of CEQA compliance, the City of Riverside has the principal responsibility for processing and approving the Project. As set forth in Section 15021 of the State *CEQA Guidelines*, as "Lead Agency", the City of



Riverside also has the duty to avoid or minimize significant environmental damage where feasible. Furthermore, Section 15021(d) states that, “CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian.” Other public agencies (i.e., Responsible and Trustee Agencies) that may use this EIR in their decision-making or permit processing, will consider the information in this EIR along with other information that may be presented during the CEQA process. In accordance with CEQA, the public agencies will be required to make findings for each environmental impact of the Project that cannot be mitigated to a less than significant level. If the Lead Agency determines the benefits of the proposed Project outweigh unavoidable significant environmental effects, the agency will be required to adopt a Statement of Overriding Considerations stating the reasons supporting their action notwithstanding the Project’s significant environmental effects.

After the public review is over for the DEIR, then the City will prepare the FEIR which will include responding to any written comments received during the 45-day public review period on the DEIR. The FEIR will be a separate document.

## 2.5.2 NOP Comment Letters

Pursuant to Section 15082 of the State *CEQA Guidelines*, the Initial Study, and a Notice of Preparation (NOP) for this DEIR were distributed to the State Clearinghouse, responsible agencies, and other interested parties via overnight or mail delivery and recipients were requested to provide responses within the 30-day public review period. The public review period for the Initial Study/NOP began on June 15, 2023 and ended on July 14, 2023. Additionally, a notice advising on the availability of the NOP was posted by the Riverside County Clerk on June 15, 2022.

**Table 2.0-A, Written Comments Received During the NOP Comment Period** below summarizes the written comments received and the issues raised. None of the comments received had the effect of changing the issue areas to be discussed in the DEIR. Copies of the comment letters, Initial Study, NOP, and NOP distribution list are included in Appendix A.

**Table 2.0-A, Written Comments Received During the NOP Comment Period**

Commenter / Date of Letter	Summary of Comment	Location in DEIR (or IS) in which Comment is Addressed
Inland Empire Biking Alliance (IEBA) July 14, 2023	Suggest the Draft EIR review bikes as a traffic reduction solution, ensure existing bike facilities remain, that project consider curb separated bike facilities, suggests project driveways constitute a design hazard, request ungated bike/pedestrian access point at Granada Avenue, that the Draft EIR include a study of a bike boulevard improvement to Granada Avenue, and inclusion of signage along the offsite footprint area be included during construction	<ul style="list-style-type: none"> <li>▪ Section 5.12 – Traffic and Transportation</li> </ul>

**Table 2.0-A, Written Comments Received During the NOP Comment Period**

Commenter / Date of Letter	Summary of Comment	Location in DEIR (or IS) in which Comment is Addressed
Native American Heritage Commission (NAHC) June 16, 2023	NAHC provided a standard comment letter outlined the requirements to comply with Assembly Bill 52 and Senate Bill 18 requiring consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed Project.	<ul style="list-style-type: none"> <li>▪ Section 5.13 – Tribal Cultural Resources</li> </ul>
Beverly Phillips June 1, 2023	Concerned that the Project would increase traffic	<ul style="list-style-type: none"> <li>▪ Section 5.12 – Traffic and Transportation</li> </ul>

Because the Project is considered to be of statewide, regional, or area wide significance, per Section 15206(b) (2)(E) of the State *CEQA Guidelines*, a scoping meeting was held July 12, 2023 via ZOOM, an online platform. No comments were received on the IS/NOP during the scoping meeting.

## 2.6 Documents Incorporated by Reference

Section 15150 of the State *CEQA Guidelines* permits and encourages an environmental document to incorporate, by reference, other documents that provide relevant data. The documents summarized below are incorporated by reference, and the pertinent material is summarized throughout this Draft EIR, where that information is relevant to the analysis of potential impacts of the Project. All documents incorporated by reference are available for review at, or can be obtained through, the City of Riverside Planning Department.

### 2.6.1 City of Riverside General Plan 2025

The *City of Riverside 2025 General Plan* (GP 2025) was adopted in 2007. The GP is a long-range plan designed to control and regulate growth in the City and to maintain the quality of the human and natural environment through 2025. The GP is the City’s planning “constitution,” or a blueprint for development, and is the single-most important policy document in guiding land use and development decisions within the City (GP 2025 FEIR, p. 2-5). To that end, the GP contains goals and policies that serve as the planning framework for the City in addition to providing direction for City operations and programs and serves as a guide to public and private decision-making. The GP 2025 includes the following required elements: [Land Use and Urban Design](#) , [Circulation and Community Mobility](#) , [Housing](#) , [Arts and Culture](#), [Education](#), [Public Safety](#), [Noise](#), [Open Space and Conservation](#), [Air Quality](#), [Public Facilities and Infrastructure](#), [Parks and Recreation](#). The GP 2025 is available online at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>.

## **2.6.2 Final Program Environmental Impact Report for City of Riverside General Plan 2025**

The *City of Riverside General Plan 2025 Final Program Environmental Impact Report State Clearinghouse No. 2004021108* (GP 2025 FEIR) was certified in 2007 and provided a first-tier analysis of the potential environmental effects of the adoption and implementation of the proposed General Plan, adoption and implementation of the comprehensive update of the Zoning Code and Subdivision Code, amendment to the Noise Code, adoption and implementation of the Magnolia Avenue Specific Plan, as well as the adoption and implementation of the *Citywide Design and Sign Guidelines* available online at <https://riversideca.gov/cedd/planning/zoning-code-and-regulations>. The GP 2025 FEIR is available online at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>.

## **2.6.3 City of Riverside Municipal Code**

The City's Municipal Code complements GP 2025. The Municipal Code, which contains among other ordinances, the City's Zoning Code (Title 19), is a mechanism to implement and enforce the goals, objectives, policies, and programs articulated in GP 2025. Many of the potential environmental concerns considered in the GP FEIR are adequately addressed through the application of regulations contained in the Municipal Code. The Municipal Code is available online at <http://www.riversideca.gov/municode/>.

## **2.6.4 General Plan Update Phase I for Updated Housing and Public Safety Elements and Environmental Justice Policies**

A comprehensive update of the General Plan is anticipated to kick off in late 2023 to guide the development of the City through the year 2050. This update will be conducted in phases. The *Phase I General Plan Update* (GPU) has already taken place which includes an updated 6<sup>th</sup> Cycle Housing Element (2021-2029), updated Public Safety Element, and Environmental Justice Policies and was approved in October 2021. The GPU is available online at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>.

## **2.6.5 Final Program Environmental Impact Report for City of Riverside General Plan Update Phase I**

The *City of Riverside Phase I General Plan Update Final Environmental Impact Report State Clearinghouse No. 2021040089* (GPU FEIR) was certified by the Riverside City Council on October 5, 2021. The GPU FEIR is a programmatic EIR that does not identify specific development projects that could occur as a result of approval of the Housing and Public Safety Element Updates and the new Environmental Justice policies. (GPU FEIR, p. 1-5.)

The Housing and Public Safety Elements are citywide planning documents associated with GP 2025. One of the components of the Housing Element Update evaluated in the GPU FEIR is a rezoning program that involves amending the Zoning Code and Specific Plans to change the zone of multiple sites identified for future housing and mixed-use development, referred to as Opportunity Sites. Environmental Justice Policies are an additional component of the project evaluated in the GPU FEIR.

GPU FEIR assessed a total of 460 parcels totaling 581 acres for rezoning, Specific Plan and General Plan Land Use amendments to accommodate the City's 6th Cycle Regional Housing Needs Assessment (RHNA) obligation of at least 18,458 new residential units over an 8-year planning period (2021-2029).



The Final EIR evaluated identified sites for a variety of zoning and Land Use changes that generally increased allowed development capacities to promote the development of new residential and mixed use projects, resulting in a potential net increase of 31,175 dwelling units.

The GPUI FEIR did not evaluate specific development densities or intensities for individual sites; rather, for sites proposed for Mixed Use Zones and General Plan designations. The GPUI FEIR assumed that 33 percent of sites would develop with nonresidential uses, 33 percent would develop with residential uses, and 34 percent would develop with a mix of residential and nonresidential uses. Of the 34 percent that would develop with a mix of uses, it was further assumed that the resulting development would comprise 80 percent residential uses and 20 percent nonresidential uses by floor area. Residential floor area was then converted to an estimated number of dwelling units by assuming an average unit size of 1,050 square feet. The GPUI FEIR is available online at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>

## 3.0 Project Description

This Draft EIR is being prepared to analyze the potential environmental effects of the construction and implementation of the proposed Arlington Mixed Use project including all on- and off-site improvements, and associated discretionary actions, including but not limited to City of Riverside project number PR-2022-001252 which includes a General Plan Amendment, Rezone, Site Plan Review, Tentative Parcel Map, and Certificate of Appropriateness, all of which are herein collectively referred to as the “Project.” All figures associated with this section start of page 3.0-12.

### 3.1 Project Location

The City of Riverside (City) is located in the northwestern portion of Riverside County. The City is bounded on the north by the Cities of Jurupa Valley, Colton, and Grand Terrace and the unincorporated community of Highgrove, to the east by the City of Moreno Valley, to the south by the unincorporated community of Woodcrest, and to the west by the Cities of Corona and Norco as reflected in **Figure 3.0-1, Vicinity Map**. The Project site is located within Section 33, Township 2 South and Range 5 West of the San Bernardino Baseline and Meridian, identified on the Riverside West, California USGS 7.5 Quadrangle Map as identified in **Figure 3.0-2, USGS Topographical Map**.

The Project entails, an approximately 17.43 gross acre and 17.37 net acre site (after dedication of 0.05 acres along Arlington Avenue for road right-of-way), located at the northeast corner of Arlington Avenue and Streeter Avenue as depicted in **Figure 3.0-3, Aerial Site Boundary Map**. The Project site consists of assessor parcel number (APN) 226-180-015-1; specifically located at 5261 Arlington Avenue, Riverside CA 92506. Project parcel throughout this document is based upon net acreage of 17.37 acres. The Project also includes approximately 1.5 miles of offsite impacts located within roadway right-of-way as reflected in **Figure 3.0-4, Aerial Site Boundary with Offsites**.

### 3.2 Environmental Setting

The proposed Project consists of an existing fully developed site, amongst an urbanized area and is completely surrounded by existing development. No natural habitats are located on site. Hence, no habitat to support listed or protected species has been identified. The Project site is relatively flat with an average elevation of approximately 787 feet above mean sea level gently sloping to the northwest.

### 3.3 Existing General Plan Land Use and Zoning Designation

The Project site has a General Plan Land Use Designation of C – Commercial and a zoning designation of CG – Commercial General as reflected in **Figure 3.0-5, Existing General Plan Land Use Designation** and **Figure 3.0-6, Existing Zoning Designation**.

#### 3.3.1 Surrounding Land Uses

The area surrounding the Project site is developed and urbanized with a variety of land uses, including commercial, medium-high density residential, high-density residential, office, and public facilities. Refer to **Table 3.0-A, Surrounding Land Uses**, for the existing land usage and general plan land use and zoning designations for the surrounding area.

**Table 3.0-A, Surrounding Land Uses**

Location	Existing Land Usage	General Plan Land Use Designation	Zoning Designation
<b>Project Site</b>	Existing Vacant Sears Department Store and Auto Center	C – Commercial	CG – Commercial-General
<b>North</b>	Residential Uses Office Uses Vacant	O – Office PF – Public Facilities C – Commercial	CG – Commercial General R- 1- 7000 – Single Family Residential
<b>East</b>	Residential Uses Office Uses	MDR – Medium Density Residential O – Office	R- 1- 7000 – Single Family Residential O – Office
<b>South</b> (Across Arlington Avenue and California Avenue)	Commercial and Office Uses	C – Commercial HDR – High Density Residential	CR – Commercial Retail CG – Commercial General O – Office
<b>West</b> (Across Streeter Avenue )	Residential, Office, and Commercial Uses	MDR – Medium Density Residential O – Office C – Commercial PF – Public Facilities	CG – Commercial General O – Office R- 1- 7000 – Single Family Residential

### 3.3.2 Airport Land Use

The Project site is located within the *Riverside County Airport Municipal Airport Land Use Compatibility Plan (RCALUCP)* and is approximately one mile from the airport runway (GE); specifically the Riverside Municipal Airport (RMA). A majority of the Project site is located within the RMA Land Use Compatibility Zone B1 with smaller portions located with Zones C and D as shown in **Figure 3.0-7, Riverside Municipal Airport Land Use Compatibility Zones**. The proposed Project is required to be reviewed by the Airport Land Use Commission for its consistency with the RCALUCP. (RCALUCP). On January 12, 2023, ALUC determined the Project to be inconsistent with the RCALUCP.

## 3.4 Project Characteristics

### 3.4.1 Project Land Use Applications

The proposed Project includes the following entitlement applications for consideration by the City of Riverside:

- General Plan Amendment (GPA): Proposes to amend the general plan land use designation from C - Commercial to MU-V - Mixed Use-Village as per **Figure 3.0-8, Proposed General Plan Land Use**.



- Rezone (RZ): Proposes to rezone the site from CG - Commercial General to MU- V - Mixed Use-Village as per **Figure 3.0-9, Proposed Zoning**.
- Site Plan Review (PPE): Proposes to develop the 17.37 net acre site with a 576,203 square foot (sf) mixed-use apartment community. Proposal includes development of 27 residential apartment buildings consisting of 2- and 3-story structures that would provide for a total of 388 residential dwelling units, one clubhouse building, and two commercial buildings providing for 546,474 sf of residential use and 4,409 sf associated clubhouse/leasing building, and 25,320 sf of commercial-retail use as per **Figure 3.0-10, Proposed Site Plan**.
- Tentative Parcel Map No. 38638 (TPM): Proposes to subdivide the 17.37 net acre site into 2 parcels for financing, conveyance, and phasing purposes. Parcel 1 will consist of 14.44 net acres for residential development and Parcel 2 will consist of 2.93 net acres for commercial-retail development as per **Figure 3.0-11, Tentative Parcel Map**.
- Certificate of Appropriateness (COA): Proposal to demolish the existing vacant Sears structures. The Sears structures were built in 1964 and have been deemed eligible for listing in the California Register of Historic Resources under Criterion 3, National Register for Historic Places, and the City of Riverside Historical Landmarks.

### 3.4.2 Existing Site Conditions

The existing Project site includes two existing commercial buildings located on the 17.37 net acre parcel that are associated with the former Sears Department Store and Automotive Service Center constructed in the mid-1960's<sup>1</sup> as shown in **Figure 3.0-12, Existing Site Conditions**. These structures are eligible for listing in the National Register for Historic Places, California Register for Historic Resources, and the City of Riverside Historical Landmarks.

The former department store was located in the central building, now a vacant structure. The interior of the vacant department store building includes retail areas, warehouse and supply storage areas, sub-grade basement areas, public and freight hydraulic elevators, and restrooms. The basement area contains a disconnected boiler, trash compactor, and emergency generator. A smaller automotive service center structure is located on the western portion of the property. This building includes six bay doors opening to a concrete-paved former service area with secondary containment structures, nine hydraulic hoists, and a sub-grade oil/water separator. (WEIS-A, p. 4).

The site formerly contained a vehicle fueling island with three 10,000-gallon gasoline USTs which were removed in 1985 and seven 1,000 to 2,000-gallon oil and waste oil USTs removed in 1987; the fueling station island and distribution lines were removed in 1994. The balance of the remaining site property comprises asphalt-paved parking areas, driveways, and minor landscaping. (WEIS-A, p. 4).

The existing site provides six access points: two along Arlington Avenue and four along Streeter Avenue. Access from Arlington Avenue consists of two full-access driveways leading to a surface parking area containing cement planters for the ornamental trees, a 3-foot cinder block wall (also referred to as Concrete masonry unit wall [CMU wall]) along site frontage and light poles for security lighting. The eastern portion of the site is composed of a surface parking area with ornamental trees and security lighting. The eastern boundary abuts existing residential development where a 6-foot block wall divides the site from the neighboring properties. Access from Streeter Avenue consists of two full-access driveways, leading to the existing Auto Center area, Sears building loading dock, and includes additional

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1. Per Cultural Resource Technical Assessment prepared by Dudek dated May 2023 (DUDEK-A).

surface parking with ornamental trees and security lighting. The northern boundary abuts existing residential development, commercial offices, and a vacant parcel where a 6-foot block wall divides the site from neighboring properties.

The Project site has remained vacant since February 2020, when Sears ceased operations. Occasionally, the vacant structure is utilized for the seasonal store “Spirit Halloween.” (PE) and the site’s parking lot was briefly used in 2020 as a COVID drive-thru testing site. Currently, the Project site surface parking area along the southeast corner has been used by the Riverside Certified Farmers Markets every Friday morning (RUHS). After the site ceased being utilized as a COVID testing site, the Sears building was burglarized and vandalized. Building systems that have been removed/stolen or damaged is rampant throughout the interior of the building. Hence, the building is no longer operational in its present condition. Since this incident, the Project site has been under 24-hour security.

### 3.4.3 Proposed Project

#### Demolition

The proposed Project would include the demolition of the existing vacant 192,139 sf former Sears buildings and all appurtenances per **Figure 3.0-13, Demolition Plan**. Sears Auto Center is a 13,713 sf structure. The 178,426 sf Sears structure consists of a 90,526 sf basement and 87,900 sf ground level. A 6-foot high protection fence with windscreen material will be installed around the site during demolition to obscure views of the site. The Project will use crushed concrete and asphaltic concrete from the Project site as engineered fill material in accordance with recommendations from the Geotechnical Reports.

#### Project Attributes

The Project proposes development of approximately 576,203 sf of residential and commercial-retail uses as reflected in **Figure 3.0-10** and **Table 3.0-B, Building Square Footage Summary**. The Project will include several amenities including: onsite leasing office, tuck-under garages, carports, public dog park, outdoor resort style pool and spa, fitness area, clubhouse, shade structures with barbeques and tables, multi-use turf areas, outdoor gaming and play spaces. The project also proposes a variety of rooftop and carport solar panels with a fixed tilt of 10 degrees with no rotation, and an orientation of 90 degrees.

**Table 3.0-B, Building Square Footage Summary**

Building Type	Building No.	Dwelling Units	Square Footage
<b>Residential</b>			
Garden Style	1	30	39,805
Garden Style	2	30	39,805
Garden Style	3	18	21,000
Garden Style	4	20	25,339
Garden Style	5	20	25,339
Garden Style	6	20	25,339
Garden Style	7	20	25,339
Garden Style	8	20	25,339
Garden Style	9	20	25,339

**Table 3.0-B, Building Square Footage Summary**

<b>Building Type</b>	<b>Building No.</b>	<b>Dwelling Units</b>	<b>Square Footage</b>
Garden Style	10	30	39,805
Garden Style	11	30	39,805
Garden Style	12	30	39,805
Garden Style	13	30	39,805
2-Story Townhome	14	5	9,615
2-Story Townhome	15	5	9,615
2-Story Townhome	16	5	9,615
2-Story Townhome	17	5	9,615
2-Story Townhome	18	5	9,615
2-Story Townhome	19	5	9,615
2-Story Townhome	20	5	9,615
2-Story Townhome	21	5	9,615
2-Story Townhome	22	5	9,615
2-Story Townhome	23	5	9,615
2-Story Townhome	24	5	9,615
2-Story Townhome	25	5	9,615
2-Story Townhome	26	5	9,615
2-Story Townhome	27	5	9,615
<b>Residential Subtotal</b>		<b>388</b>	<b>546,474</b>
Clubhouse/Fitness/Leasing	N/A		4,409
<b>Commercial</b>			
Grocery	N/A	N/A	20,320
Retail	N/A	N/A	5,000
<b>Commercial Subtotal</b>		N/A	<b>25,320</b>
<b>TOTALS</b>		<b>388</b>	<b>576,203</b>

*Residential*

The residential component of the proposed Project includes development of 27 residential buildings providing for 546,474 sf of residential use and one 4,409 sf Clubhouse/Fitness/Leasing building. The Clubhouse/Fitness/Leasing building will be publicly accessible while the residential portion will be accessible via gates. The residential buildings will allow for a total of 388 dwelling units and be divided between 13 3-story garden style buildings providing for 318 dwelling units and 14 2-story townhome buildings providing for 70 dwelling units. The unit mix will be comprised of 18 studio units, 152 one-bedroom units, 28 two-bedroom units, and 42 three-bedroom units. As reflected in **Figure 3.0-10**, buildings 1-13 would be 3-Story garden style residential structures. Buildings 14-27 would be 2-Story townhomes. The 3-Story garden style buildings would introduce 318 residential units, while the 2-Story



townhomes would introduce 70 residential units. The 3-Story Garden Style residential buildings will offer varying exterior styles. Proposed residential elevations floor plans are reflected in the following figures:

- **Figure 3.0-14, Proposed Elevations [Garden Style-Type III Front & Left]**
- **Figure 3.0-15, Proposed Elevations [Garden Style-Type III-Rear & Right]**
- **Figure 3.0-16, Proposed Elevations [Townhomes]**
- **Figure 3.0-17, Proposed Floor Plans [Garden Style Plans 1 of 2]**
- **Figure 3.0-18, Proposed Floor Plans [Garden Style Plans 2 of 2]**
- **Figure 3.0-19, Proposed Floor Plans [Townhome Plans]**

These exterior styles will contain a similar color palette to unify the buildings throughout the Project site. The residential area will also provide a 4,036 sf dog park, pedestrian promenade, picnic, pool and spa, shade structures, barbeques and tables, outdoor gaming and play spaces, multi-use turf areas, and play areas. The dog park will be accessible through a gate on the residential side and accessible to the public via a gate in the commercial area.

### *Commercial-Retail*

The proposed Project will provide 25,320 sf of commercial-retail use by way of two commercial-retail buildings in the southeastern portion of the site along Arlington Avenue. A 5,000 square feet (sq. ft.) multi-tenant retail speculative pad would be located in the southwestern corner of the project site with an adjoining outdoor dining/flex space that could include a 24-hour operation. This area of the site also proposes a 20,320 sq. ft. grocery store pad as reflected in **Figure 3.0-20, Proposed Elevations ALDI Right & Rear** and **Figure 3.0-21, Proposed Elevations ALDI Left & Front**. The Project is projected to have up to 51 employees.<sup>2</sup>

The proposed grocery store is expected to operate between the hours of 9am and 9pm seven days a week. The store is estimated to include approximately 20 employees; scheduling 3 to 7 employees per shift. Store deliveries are expected to take place once per day, by a WB67 truck from the Moreno Valley warehouse located southwest of Redlands Boulevard and State Route 60. There will also be limited small truck deliveries for beverages and bakery items.

### **Parking**

As shown in **Figure 3.0-22, Proposed Parking Plan**, the Project will provide parking areas for residential occupants, residential guests, and commercial-retail users. The plan provides for a total of 815 parking spaces across the entirety of the site. A total of 683 parking spaces will be dedicated to residential uses and includes 594 standard stalls, 20 Americans with Disability Act (ADA) accessible stalls, 66 electric vehicle charging station (EVCS) stalls, and 3 ADA/EVCS stalls. A total of 132 parking stalls will be dedicated to commercial-retail uses which includes 111 standard stalls, 7 ADA accessible stalls, 12 EVSC stalls, and 2 ADA/EVCS stalls. Additionally, the site will provide 41 stalls for bicycle parking.

### **Open Space**

The Project will include open space throughout the proposed development. Specifically, within the private residential areas per City requirements, the Project should provide 19,400 square feet of open

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2. Source: County of Riverside General Plan Appendix E-2: Socioeconomic Buildout Assumptions and Methodology, Table E-5: Commercial Employment Factors, p. 3, dated April 11, 2017, available at [https://planning.rctlma.org/Portals/14/genplan/general\\_Plan\\_2017/appendices/Appendix%20E-2\\_April%202017.pdf?ver=2017-10-23-153612-743](https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/appendices/Appendix%20E-2_April%202017.pdf?ver=2017-10-23-153612-743), accessed November 14, 2022.

Based on employee generation rate of 500 square feet per employee of commercial retail (25,320 sf ÷ 500 sf/employee = 51 employees).

space and the public/common areas should also provide 19,400 square feet of open space. The Project will include 36,502 sf of private open space associated with each of the residential building areas, as well as 57,071 sf in the public/common areas. The public common open space includes areas such as the dog park, pool, and clubhouse. There are 72 existing ornamental, non-native trees located throughout the site. The Project will remove these trees and instead provide a landscape plant palette consistent with *Riverside Citywide Design Guidelines* for Water Efficient Landscape and Irrigation Design Guidelines, amended January 2019 (RCDG) as well as plants consistent with the Riverside County Airport Land Use Commissions *Landscaping Near Airports: Special Considerations for Preventing or Reducing Wildlife Hazards to Aircraft* (ALUC-A) as reflected in the following figures:

- **Figure 3.0-23, Conceptual Landscape Plan**
- **Figure 3.0-24, Landscape Planting Plan**
- **Figure 3.0-25, Plant Palette [1 of 2]**
- **Figure 3.0-26, Plant Palette [2 of 2]**

The residential portion of the Project site will be surrounded by a 6 foot high tubular steel fence, 6 foot high block wall, or combination block wall/steel fence as reflected in **Figure 3.0-27, Wall and Fence Plan**. The Project includes details for walls and fences within the site and around the perimeter of the site as well as sign plans, fountain wall, dog park gates, vehicular gates, and access gates for residential access as reflected in **Figure 3.0-28, Wall and Fences Details [1 of 2]**, and **Figure 3.0-29, Wall and Fence Details [2 of 2]**.

**Lighting**

The proposed Project will include exterior building lights and pedestrian lighting for safety and security purposes within parking lots, along pathways, and on buildings as identified in **Figure 3.0-30, Proposed Lighting Plan**. All light sources will be shielded so that the light is directed away from streets and adjoining properties. Further, all light fixtures will be required to be consistent with the City of Riverside Municipal Code – Title 19, Zoning Code for illumination. Existing streetlights are located along Streeter Avenue and Arlington Avenue within the right-of-way.

**Construction**

Construction is anticipated to take approximately 23 months and will be built in two phases with the first phase being commercial parcel, and the second phase being the residential parcel as reflected in **Table 3.0-C, Phase 1 Estimated Construction Schedule** and **Table 3.0-D, Phase 2 Estimated Construction Schedule**, below. Grading of the Project site will include 18,376 cubic yards (CY) of cut and 18,127 CY of fill. This activity results in a net export of approximately 249 CY. When import or export is within 2 percent of the overall grading values, a site is considered to be balanced. Since export will be less than 2 percent of the overall grading value of the Project, the site is considered to be balanced. Construction is anticipated to commence July 2024 and be completed in 2026.

**Table 3.0-C, Phase 1 Estimated Construction Schedule**

<b>Construction Activity</b>	<b>Start Date</b>	<b>End Date</b>	<b>Total Working Days</b>
Demolition	July 1, 2024	July 26, 2024	20
Grading	July 29, 2024	August 9, 2024	10
Building Construction	August 12, 2024	June 27, 2025	230
Paving	June 9, 2025	June 27, 2025	15

Architectural Coating	June 9, 2025	June 27, 2025	15
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**Table 3.0-D, Phase 2 Estimated Construction Schedule**

Construction Activity	Start Date	End Date	Total Working Days
Grading	January 1, 2025	January 28, 2025	20
Building Construction	January 29, 2025	May 26, 2026	345
Architectural Coating	December 3, 2025	May 26, 2026	125
Paving	January 29, 2025	March 25, 2025	40

Grading would be accomplished with scrapers, motor graders, water trucks, dozers, and compaction equipment. It is anticipated Building materials would be off-loaded and installed using small cranes, boom trucks, forklifts, rubber-tired loaders, rubber-tired backhoes, and other small- to medium-sized construction equipment as needed.

### 3.4.4 Vehicular Circulation and Site Access

Regional access to the Project Site is provided via State Route 91 (SR-91) from Madison Avenue ramps located approximately 0.8 miles to the south, as well as Arlington Avenue ramps located 1.5 miles to the south. Local access is provided via Arlington Avenue and Streeter Avenue. Arlington Avenue is currently constructed to its ultimate half-section width as an arterial along the Project’s frontage from the Project’s western boundary to the Project’s eastern boundary. Specifically, Arlington Avenue is classified as a 120 feet (ft) arterial street with 6 lanes east of Streeter Avenue and an 88 ft arterial street with 4 lanes west of Streeter Avenue. Also, Streeter Avenue is currently constructed to its ultimate half-section width as an 88 ft arterial along the Project’s frontage from the Project’s southern boundary to the Project’s northern boundary.

The proposed Project site will leave in place four of the six existing full access driveways: two along Arlington Avenue and two along Streeter Avenue. Primary site access for the residential area will be from Streeter Avenue with secondary access from Arlington Avenue. The existing driveway will be enhanced by the addition of decorative pavement and an art installation. Primary access for commercial area will be from Arlington Avenue with secondary access from Streeter Avenue. The following lists the proposed improvements and is reflected in **Figure 3.0-31- Proposed Transportation Improvements:**

#### Driveway and Roadways

- Driveway #1 – Streeter Avenue and Granada Avenue Intersection
  - Install a stop control on the westbound approach (the Project driveway) and construct a westbound shared left-through-right turn lane.
- Driveway #2 – Streeter Avenue and El Molino Avenue Intersection
  - Install a stop control on the westbound approach (the Project driveway) and construct a westbound shared left-through-right turn lane and modify the existing median to provide 225-feet of storage for the southbound left turn lane.
- Driveway #3 – California Avenue and Arlington Avenue Intersection
- install a stop control on the southbound approach (the Project driveway), construct a southbound right turn lane and construct a westbound right turn lane.



- Driveway #4 - Along Arlington Avenue
  - Construct a shared left-through-right turn lane on the southbound approach (the Project driveway), construct a westbound right turn lane, improve the existing traffic signal infrastructure with Audible Push Buttons, install a new traffic signal pole on the north leg, widen Project driveway (north leg of intersection), relocate the existing traffic signal pole located on the north leg to accommodate new drive aisle width and sidewalk/curb-and-gutter locations, and modify existing raised median to provide 150-foot eastbound left turn pocket.
- Streeter Avenue and Arlington Avenue Intersection
  - Improve the existing traffic signal infrastructure with Audible Push Buttons and cut back medians on the north, east, and west legs to allow for a clear travel path for pedestrians at all approaches and purchase a new traffic signal controller for this intersection.
- Streeter Avenue from southern Project boundary to northern Project boundary
  - Improve curb and gutter, sidewalk, and landscaping as necessary for site access and consistent with City standards.
- Arlington Avenue from western Project boundary to eastern Project boundary
  - Dedicate 5-feet of pavement from the existing curb-and gutter (60-feet from centerline to edge of ROW) on Arlington Avenue and improve curb and gutter, sidewalk, and landscaping as necessary for site access and consistent with City standards.
- California Avenue, Streeter Avenue, and Arlington Avenue
  - Modify the traffic signal to implement a 130-second cycle.

### **Bikeways**

- Streeter Avenue
  - From Central Avenue to Arlington – stripe a Class II bike lane.
  - Streeter Avenue/Granada Avenue Intersection – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.
  - Streeter Avenue/Sierra Street South – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.
  - Streeter Avenue/Sierra Street North – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.

Visitor parking will be provided within the entry plaza prior to entering the residential area and several areas throughout the residential portion for residential guests. The residential portion of the Project site will be gated. Primary access to the residential portion of the site will be acquired from Streeter Avenue via two access gates along both sides of the entry driveway. A second and third access gate will be provided from the commercial area. The internal road network is designed to be at least 20 feet wide to allow for emergency vehicle access. The driveway north of the existing Bank of America on Streeter Avenue will serve as egress for future residents and as an emergency access. All entrances and exits will be gate controlled.

### **Public Transit**

The Riverside Transit Agency (RTA) currently serves the Project area. Route 12 travels along Streeter Avenue while Route 15 travels along Arlington Avenue in the Project area. The nearest bus stops and shelters are located on Arlington Avenue and Streeter Avenue. The bus shelter along Arlington Avenue is situated in front of the location of the proposed ALDI. The City will replace the shelter once Arlington Avenue has been widened.

### **3.4.5 Pedestrian Circulation, Bike Lanes and Site Access**

As shown in **Figure 3.0-32, Pedestrian Circulation**, the Project will provide several pedestrian pathways to facilitate the movement of pedestrians within the site. These pathways will be lit to ensure security. The Project site will also provide pedestrian linkage to the surrounding area by providing connection to the existing sidewalks along Streeter Avenue and Arlington Avenue. Additionally, the Project would stripe a Class II bike lane along Streeter Avenue, from Central Avenue to Arlington Avenue.

### **3.4.6 Infrastructure and Utilities**

As the Project is an existing developed site with existing vacant structures, utilities are provided within and around the site. Several of the existing utility facilities on-site will be removed and replaced or relocated as reflected in **Figure 3.0-33, Existing and Proposed Utility Plan**, to provide connection to existing facilities within the rights-of-way. The site is served by Riverside Public Utilities (RPU) for electric as discussed below and Southern California Gas for natural gas.

#### **Water**

Public water service for both potable and non-potable/recycled water would be provided by RPU. There is an existing 8-inch water line exists in Streeter Avenue and an existing 12-inch line in Arlington Avenue. Project will connect to the existing lines in both Streeter and Arlington via 10-inch meter and backflow devices.

#### **Sewer**

Wastewater treatment for the project would be provided by the City Public Works Department at the Riverside Regional Water Quality Control Plant. The proposed project would connect to an existing 8-inch sewer line located on Streeter Avenue and a 21-inch sewer line in Arlington Avenue through 8-inch sewer laterals.

#### **Stormwater Facilities**

The proposed Project site will be paved with landscaping throughout. The proposed Project will relocate existing on-site storm drain system and provide new on-site drainage patterns and be designed to incorporate catch basins and biotreatment BMPs and landscaping features to redirect, capture, and treat surface runoff from new development prior to entering the existing storm drain system through connection to the existing 30-inch and 33-inch lines in Streeter Avenue, as reflected on **Figure 3.0-34, Proposed Drainage & Grading Plan**.

#### **Electricity**

RPU provides electrical services to the Project site. All electrical facilities would connect to existing connections in Arlington Avenue and Streeter Avenue. There are existing power poles located along Arlington Avenue located within the right-of-way. An additional circuit will be required to meet the Project's estimated electric demand. This will require approximately 1.5 miles of offsite trenching to connect to existing RPU electric facilities. Trenching will occur within existing ROW and will include approximately 0.5 miles in Streeter Avenue from Arlington Avenue to Central Avenue; approximately 0.5 miles in Central Avenue from Streeter Avenue to Hillside Avenue; and approximately 0.5 miles in Hillside Avenue from Central Avenue to Mountain View Avenue. It is anticipated that trenching may be as deep as 7 to 8 feet below ground. There is some existing conduit and vaults within this alignment. The Project will be required to provide areas of new 6.5-inch conduit and approximately 10 electric vaults

sized at 8 feet by 14 feet in order to provide the additional circuit and connect to existing facilities. RPU staff reviewed the proposed project and with the addition of the offsite extensions adequate electrical facilities exist to serve the Project. With these improvements, RPU has sufficient capacity to serve the Project site.

### **Natural Gas**

Southern California Gas provides natural gas service to the Project site. Existing lines exist in both Arlington and Streeeter Avenues to which the project will connect. A 30-inch transmission line also exists in Arlington Avenue. Transmission lines are generally large diameter pipelines that operate at pressures above 200 psi and transport gas from supply points to the gas distribution system.

### **3.4.7 School District**

The Riverside Unified School District will serve the Project site. The project will be responsible for impact fees assessed by the school district.

### **3.4.8 Off-Site Improvements**

All offsite improvements are related to electric facilities and associated roadway improvements described in Section 3.4.4 as described above. The offsite area encompasses approximately 13 acres. A small 0.15 acres portion of this offsite improvement area is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Criteria Cell number 621, Subunit 1 – Santa Ana River South as reflected in **Figure 3.0- 35, Offsite Biological Resources**.

### **3.4.9 Project Objectives**

Per Section 15124 (b) of the CEQA Guidelines, an EIR needs to include a statement of the objectives of a project which will help the City develop a reasonable range of alternatives. The Objectives need to outline the general purpose of the Project and are as follows:

1. Primarily, provide quality, multi-family housing on an existing underutilized site, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers, as well as the City's overarching self-prescribed housing unit numbers.
2. Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.
3. Place housing near existing commercial uses to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.
4. Provide compatible mixed-use development contributing to the character of the surrounding neighborhood.
5. Establish a mixed-use development that will provide a land use transition between the existing commercial Hardman Center and the residential developments surrounding the project site.

## **3.5 Discretionary Actions and Approvals**

The Draft EIR serves as an informational document for use by public agencies, the public, and decision makers. This Draft EIR discusses the impacts of development pursuant to the proposed Project and related components and analyzes Project alternatives. This Draft EIR will be used by the City of



Riverside and responsible agencies in assessing impacts of the proposed Project. The following approvals and permits are required from the City of Riverside to implement the proposed Project:

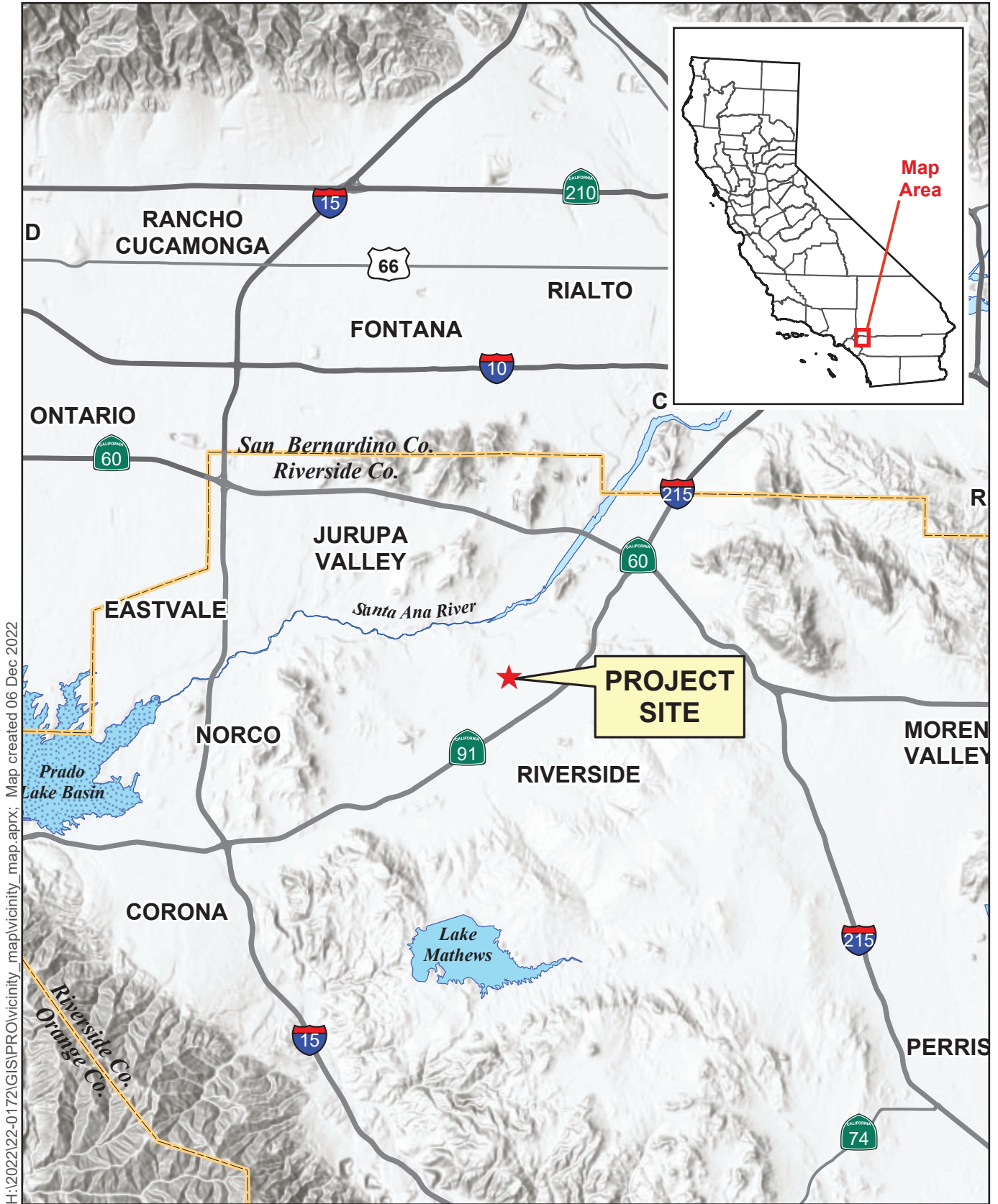
- General Plan Amendment (GPA) - to amend the existing General Plan Land Use designation of Commercial to Mixed-Use Village;
- Rezone (RZ) - to change the current zoning designation of Commercial General to Mixed-Use Village;
- Site Plan Review - for an approximately 576,203 square foot mixed use development including 388 dwelling units on approximately 17.37 net acres.
- Tentative Parcel Map (TPM) - to subdivide 17.37 net acre site into 2 parcels for financing, conveyance, and phasing purposes; and
- Certificate of Appropriateness (COA) - to demolish the existing vacant Sears structures, which have been found to be eligible for listing as a historic resource.
- Certification of the EIR - with the determination that the EIR has been prepared in compliance with the requirements of CEQA.

Other non-discretionary actions anticipated to be taken by the City at the staff level as part of the proposed Project include:

- Review and approval of all infrastructure plans, including street and utility improvements pursuant to the conditions of approval;
- Review all on-site plans, including grading and on-site utilities; and
- Approval of a preliminary Water Quality Management Plan (WQMP) to mitigate post-construction runoff flows.

Approvals and permits that may be required by other agencies include:

- Santa Ana Regional Water Quality Control Board (RWQCB) - A NPDES permit from the to ensure that construction site drainage velocities are equal to or less than the pre-construction conditions and downstream water quality is not worsened
- Riverside County Airport Land Use Commission (ALUC) - Consistency Determination
- Western Riverside County Regional Conservation Authority – Joint Project Review Determination

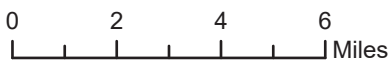


H:\2022\22-0172\GIS\PRO\vicinity\_map\vicinity\_map.aprx; Map created 06 Dec 2022

Source: Riverside County GIS, 2020.

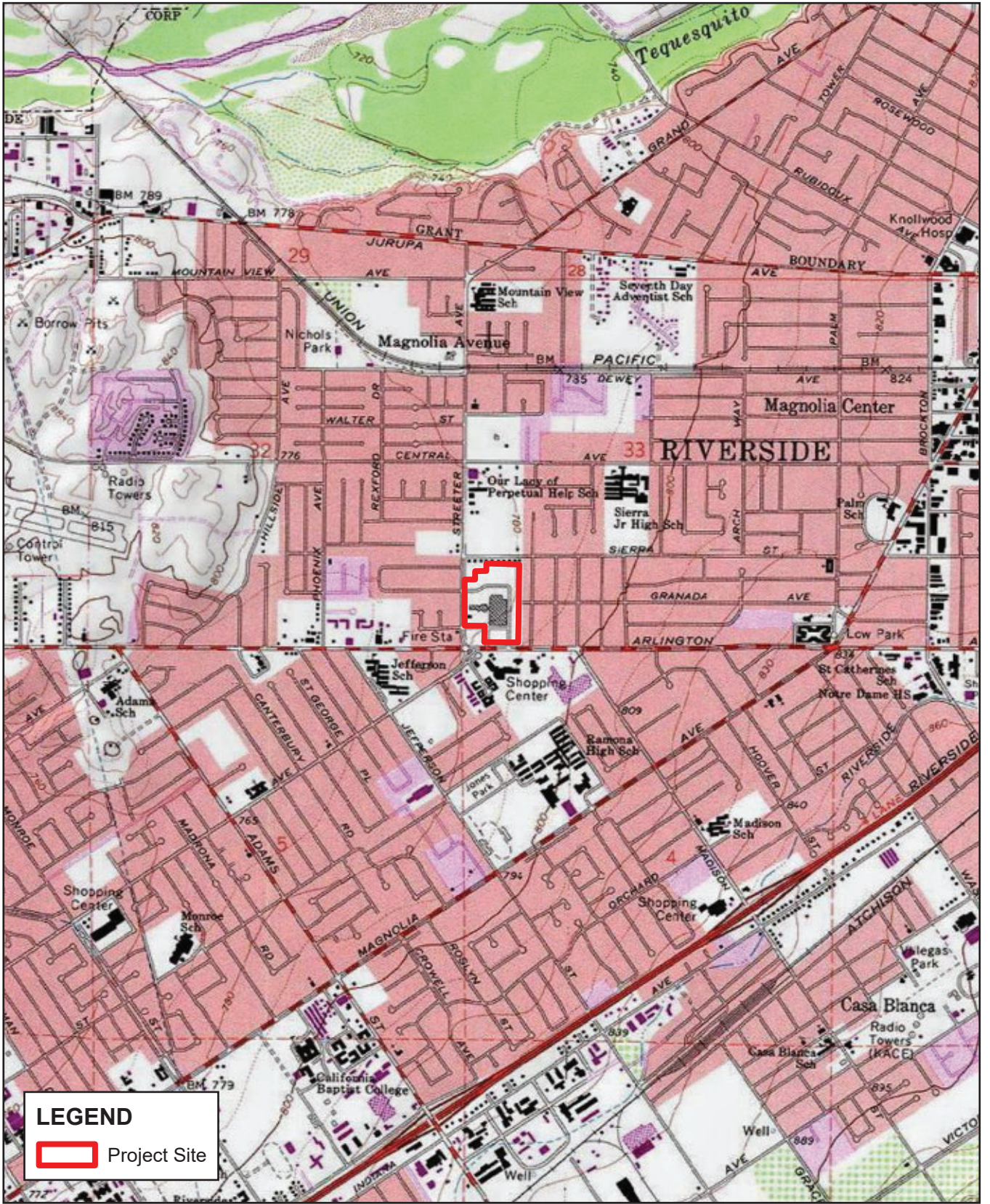
**Figure 3.0-1 Vicinity Map**

Arlington Mixed Use






H:\2022\22-0172\GIS\PRO\usgs\_topo\_map.aprx; Map created 06 Dec 2022; virginia.w



**LEGEND**

 Project Site

Sources: ESRI / USGS 7.5min Quads:  
RIVERSIDE WEST



0 1,000 2,000 3,000  
|-----|-----|-----|  
Feet

**Figure 3.0-2 USGS Topographic Map**  
Arlington Mixed Use



H:\2022\22-0172\GIS\PRO\Aerial\_boundary\Aerial\_boundary.aprx; Map created 20 Jun 2023



Sources: Riverside Co. GIS, 2020 (streets) and 2020 (imagery).

**Figure 3.0-3 Aerial Site Boundary Map**

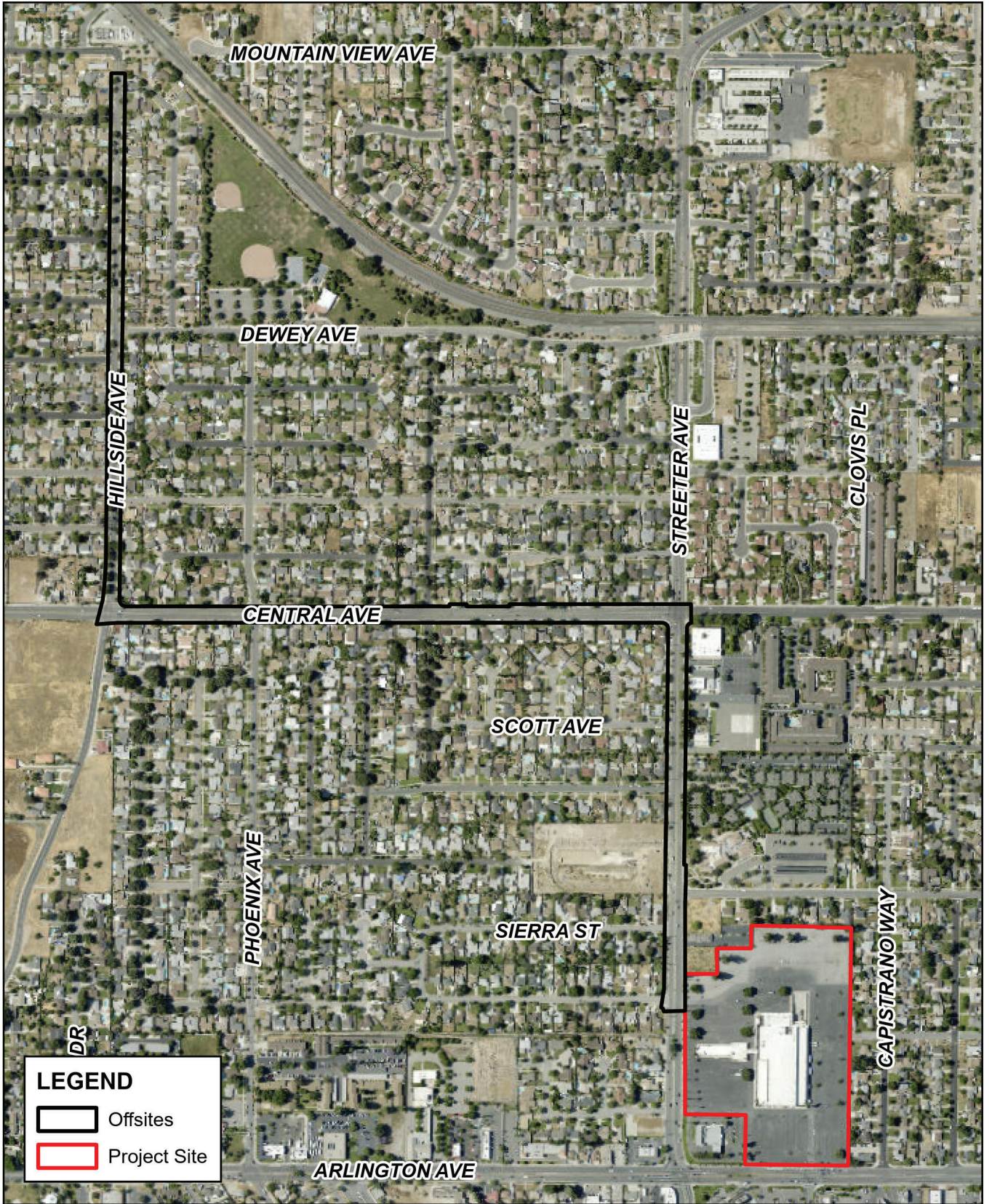
Arlington Mixed Use



0      100      200      300  
 Feet



H:\2022\22-0172\GIS\PRO\airial\_site\_and\_offsites.aprx; Map created 20 Jun 2023



Sources: Riverside Co. GIS, 2020 (streets) and 2020 (imagery).

**Figure 3.0-4 Aerial Site Boundary with Offsites**

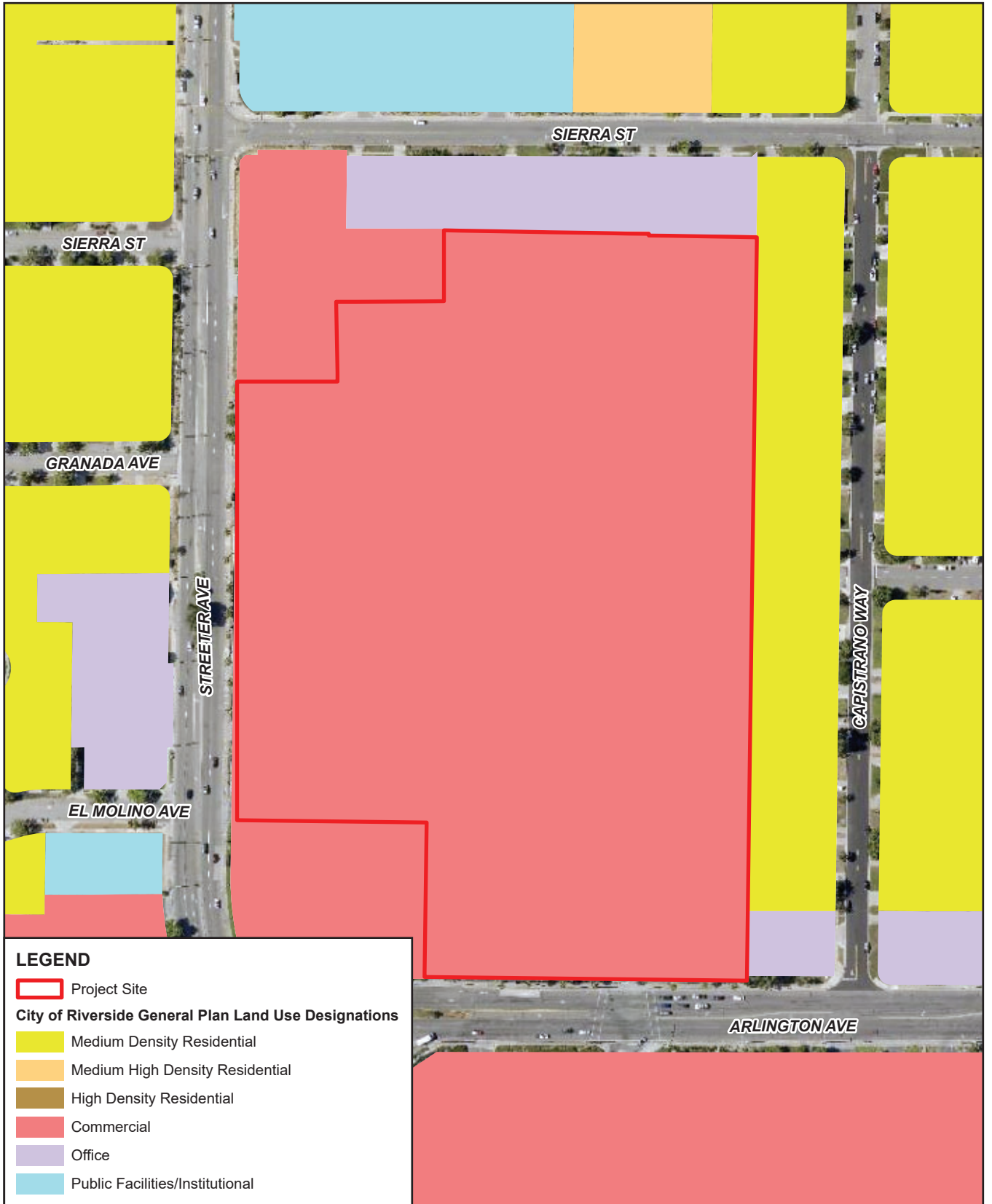
Arlington Mixed Use



0      500      1,000      1,500  
 Feet



F:\2022\22-0172\GIS\PRO\gplu\gplu.aprx; Map created 06 Dec 2022



Sources: Riverside Co. GIS, 2020;  
City of Riverside General Plan Land Use, 2021.

### Figure 3.0-5 Existing General Plan Land Use Designation

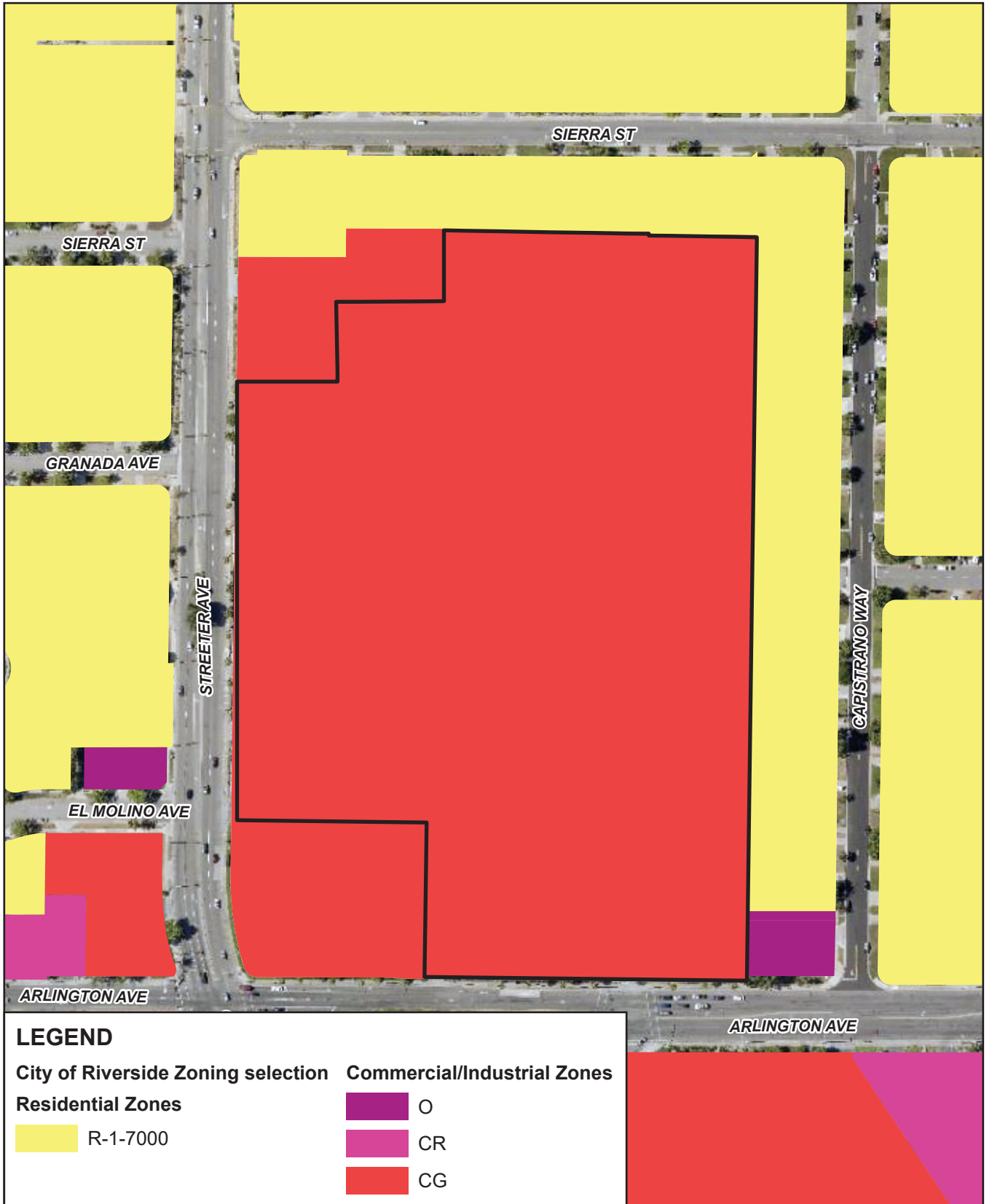
Arlington Mixed Use



0 150 300 450 Feet



Fi:\2022\22-0172\GIS\PRO\zoning.aprx; Map created 06 Dec 2022



Sources: Riverside Co. GIS, 2020;  
City of Riverside General Plan  
Land Use, 2021.

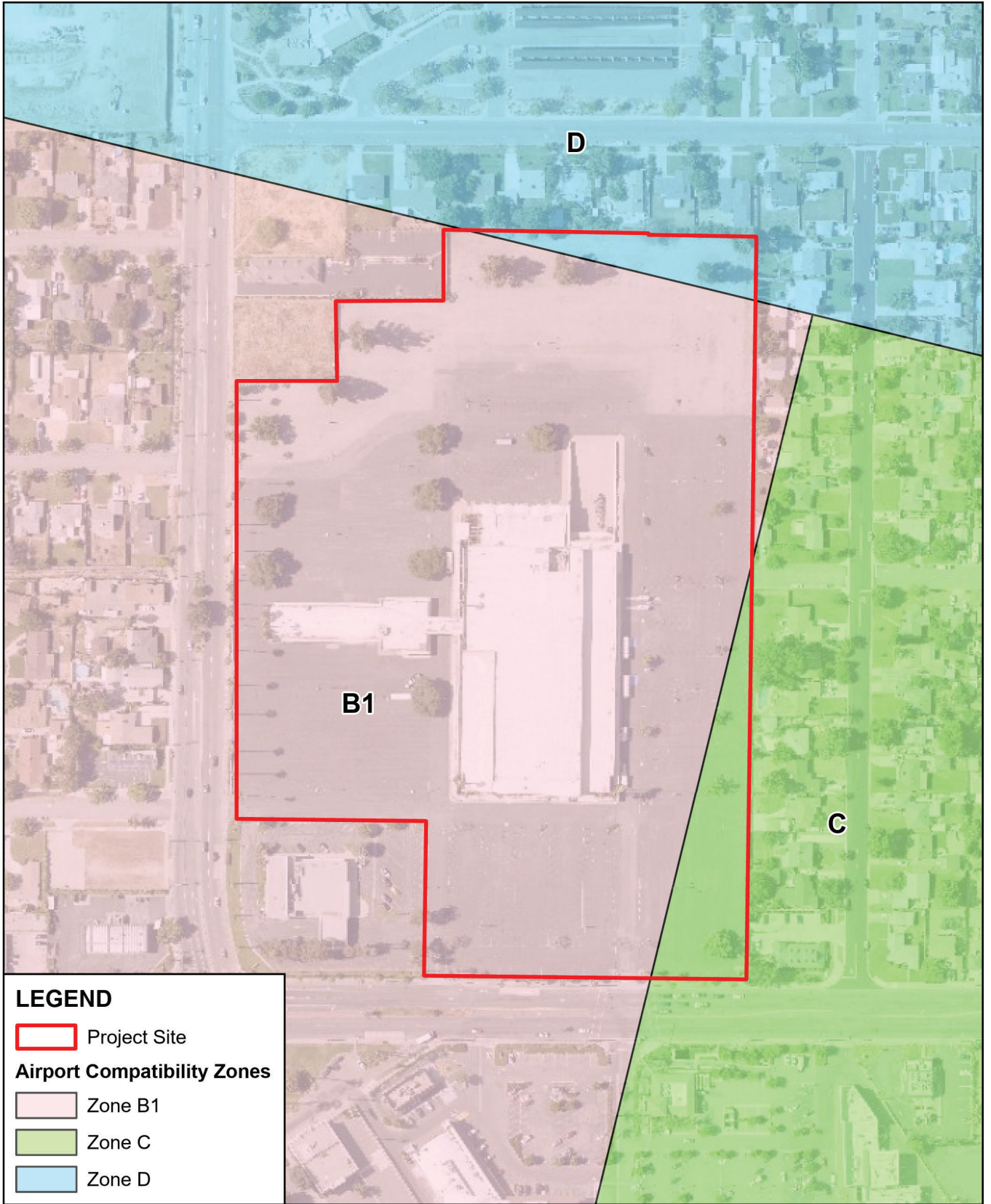
**Figure 3.0-6 Existing Zoning Designation**

Arlington Mixed Use



0 150 300 450 Feet

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**LEGEND**

 Project Site

**Airport Compatibility Zones**

 Zone B1

 Zone C

 Zone D

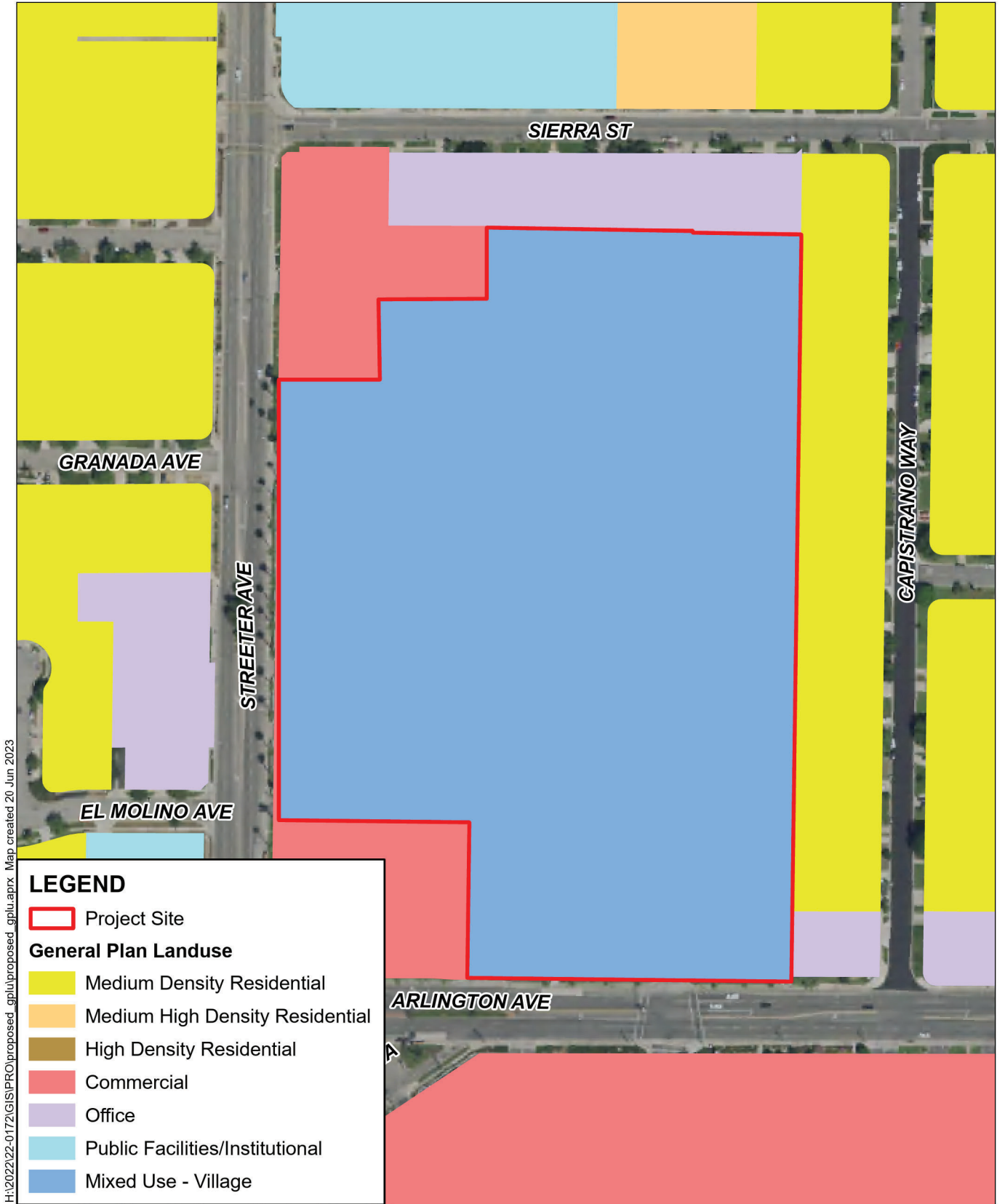
Sources: Riverside Co. GIS, 2020;  
Airport Compatibility Zones, 2022.

**Figure 3.0-7 Existing Airport  
Land Use Compatibility Zones**

Arlington Mixed Use



0 150 300 450 Feet



H:\2022\22-0172\GIS\PRO\proposed\_gplu.aprx. Map created 20 Jun 2023

Source: City of Riverside General Plan Land Use, 2021;  
Riverside Co. GIS, 2020.

**Figure 3.0-8 Proposed General Plan Land Use**

Arlington Mixed Use



0 150 300 450 Feet





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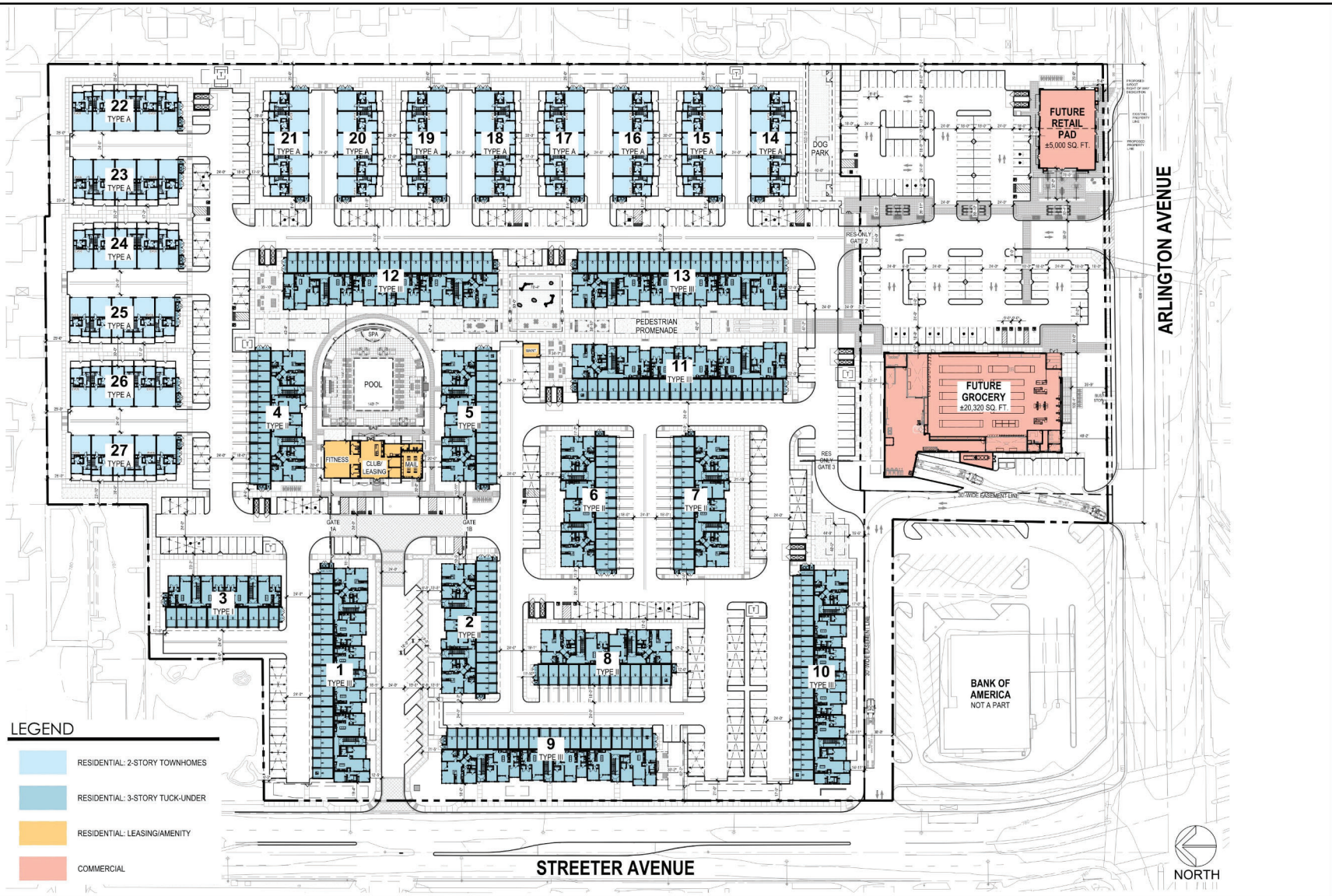
Source: City of Riverside Zoning, 2021;  
Riverside Co. GIS, 2020.

**Figure 3.0-9 Proposed Zoning**  
Arlington Mixed Use



0 100 200 300 Feet

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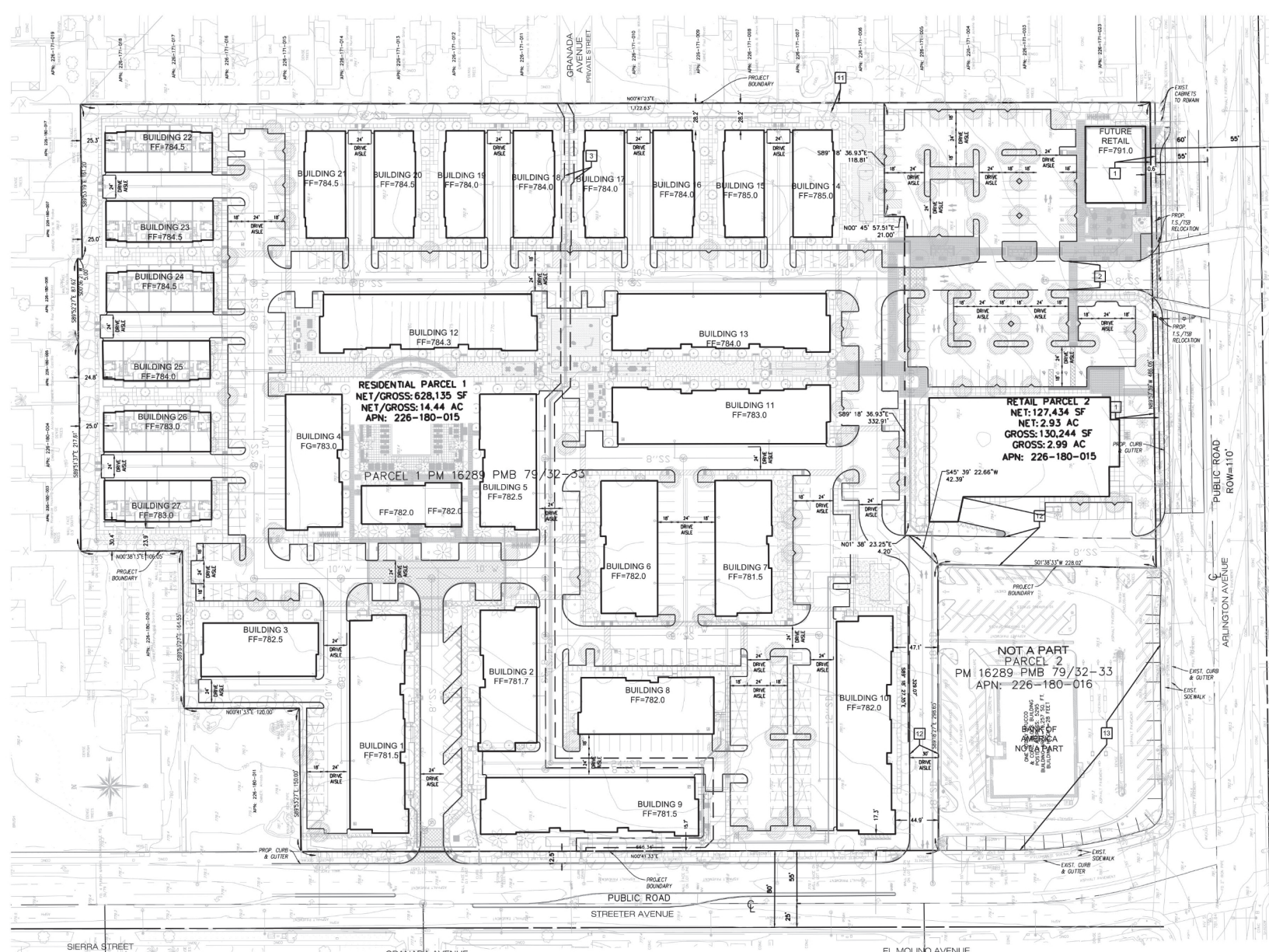
Source: Architects Orange June 15, 2023.

**Figure 3.0-10 Proposed Site Plan**  
Arlington Mixed Use

NTS



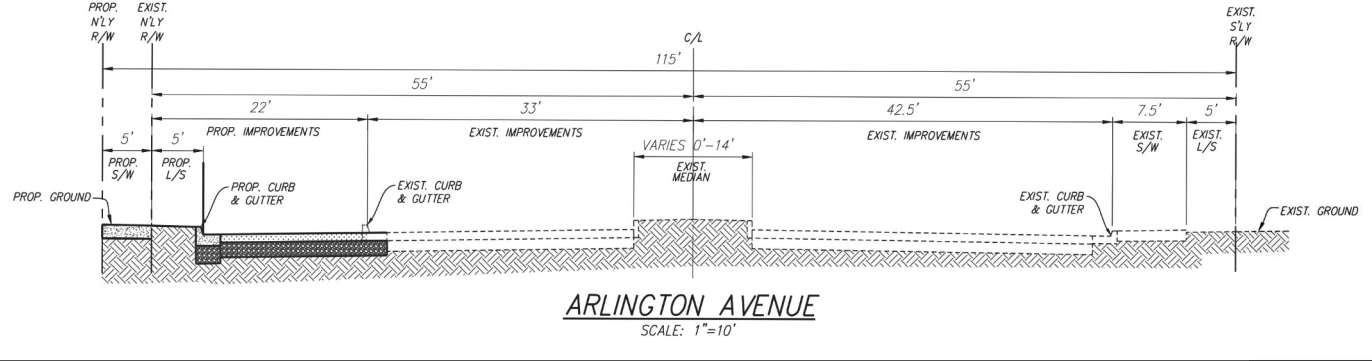
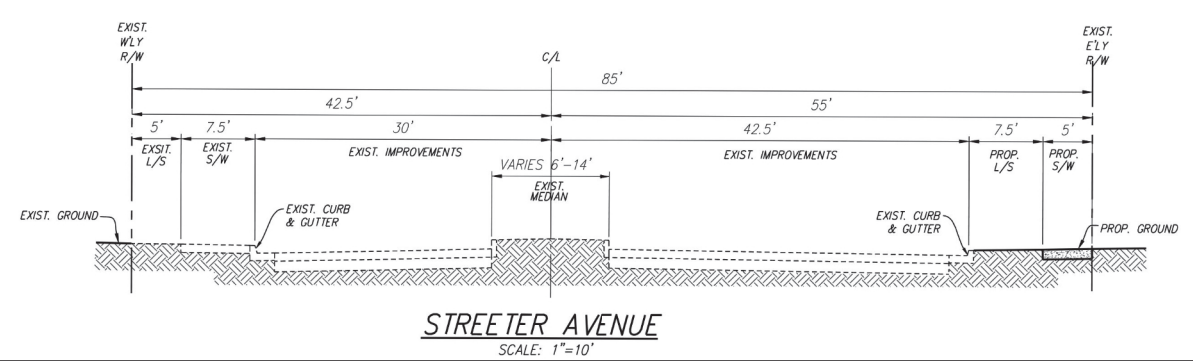
H:\2022\22-0172\GIS\PRO\tentative parcel.aprx Map created 24 Oct 2023



DEVELOPMENT STANDARDS FOR MU-V ZONE		
	REQUIREMENTS	PROPOSED
LOT AREA	20,000 SQ.FT (MINIMUM)	756,836 SQ.FT
LOT DEPTH	100 FT (MINIMUM)	1,123.25 FT
LOT WIDTH	75 FT (MINIMUM)	780.92 FT
FRONT YARD SETBACK	0 FT (MINIMUM)	5 FT
SIDE YARD SETBACK	0 FT (MINIMUM)	25 FT
REAR YARD SETBACK	15 FT (MINIMUM)	15.17 FT
BUILDING HEIGHT	45 FT (MAXIMUM)	41.25 FT (MAXIMUM)
FAR	2.5 (MAXIMUM)	0.6
RESIDENTIAL DENSITY (GROSS)	30 DU/AC (MAXIMUM)	22.30 DU/AC
OPEN SPACE REQUIREMENTS - STAND ALONE RESIDENTIAL	NA	NA
OPEN SPACE REQUIREMENTS - MIXED-USE DEVELOPMENT	NA	NA
PRIVATE OPEN SPACE	50 SQ.FT/DU (MINIMUM)	91.80 SQ.FT/DU
COMMON OPEN SPACE	50 SQ.FT/DU (MINIMUM)	147.90 SQ.FT/DU

PROJECT SUMMARY		
PARCEL NO.	NET SQUARE FEET	NET ACRES
PARCEL 1	628,135	14.44
PARCEL 2	127,434	2.93
TOTAL	755,569	17.37

PROJECT SUMMARY		
PARCEL NO.	GROSS SQUARE FEET	GROSS ACRES
PARCEL 1	628,135	14.44
PARCEL 2	130,244	2.99
TOTAL	758,379	17.43



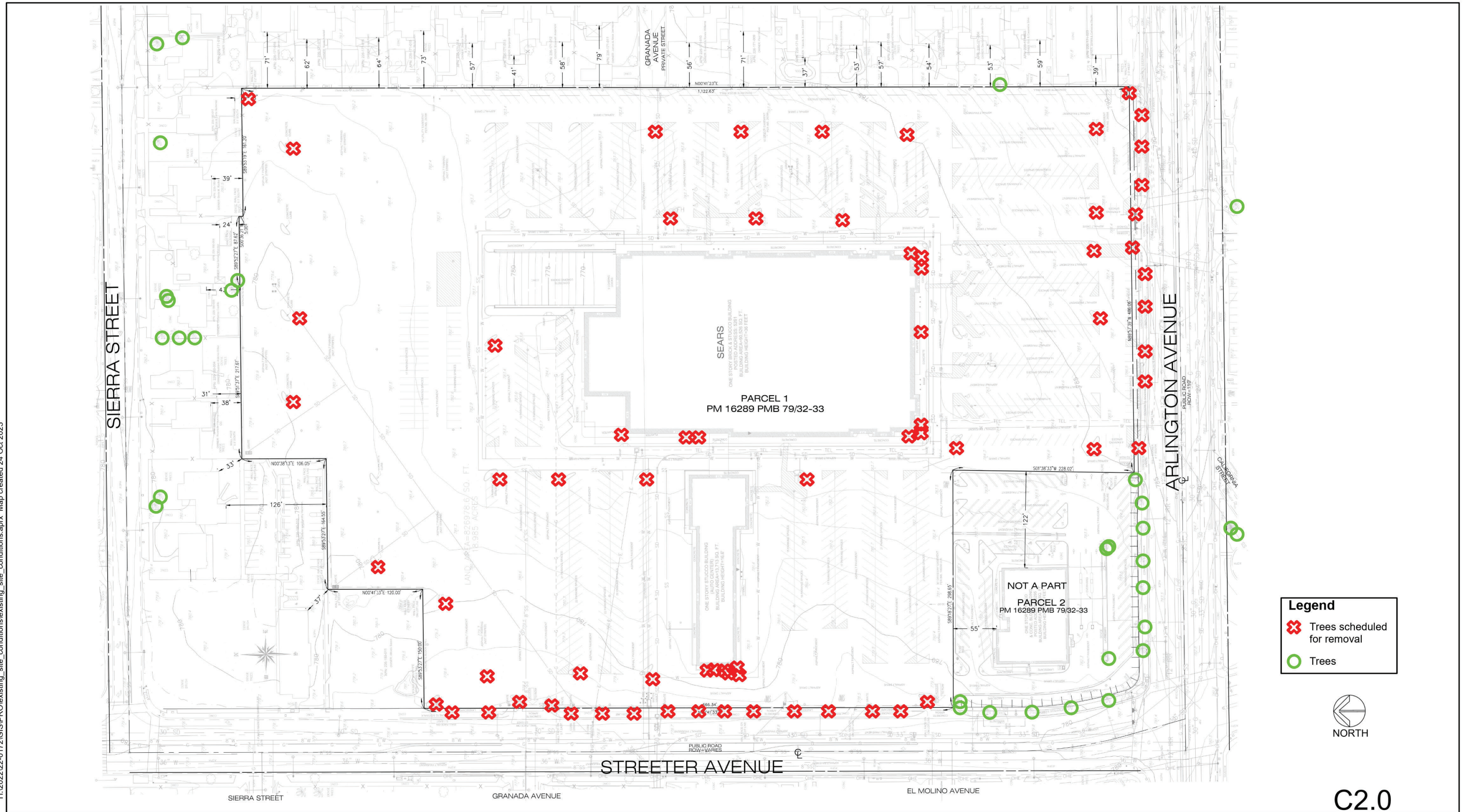
Source: Architects Orange, 2022.

**Figure 3.0-11 Tentative Parcel Map**  
Arlington Mixed Use

NTS







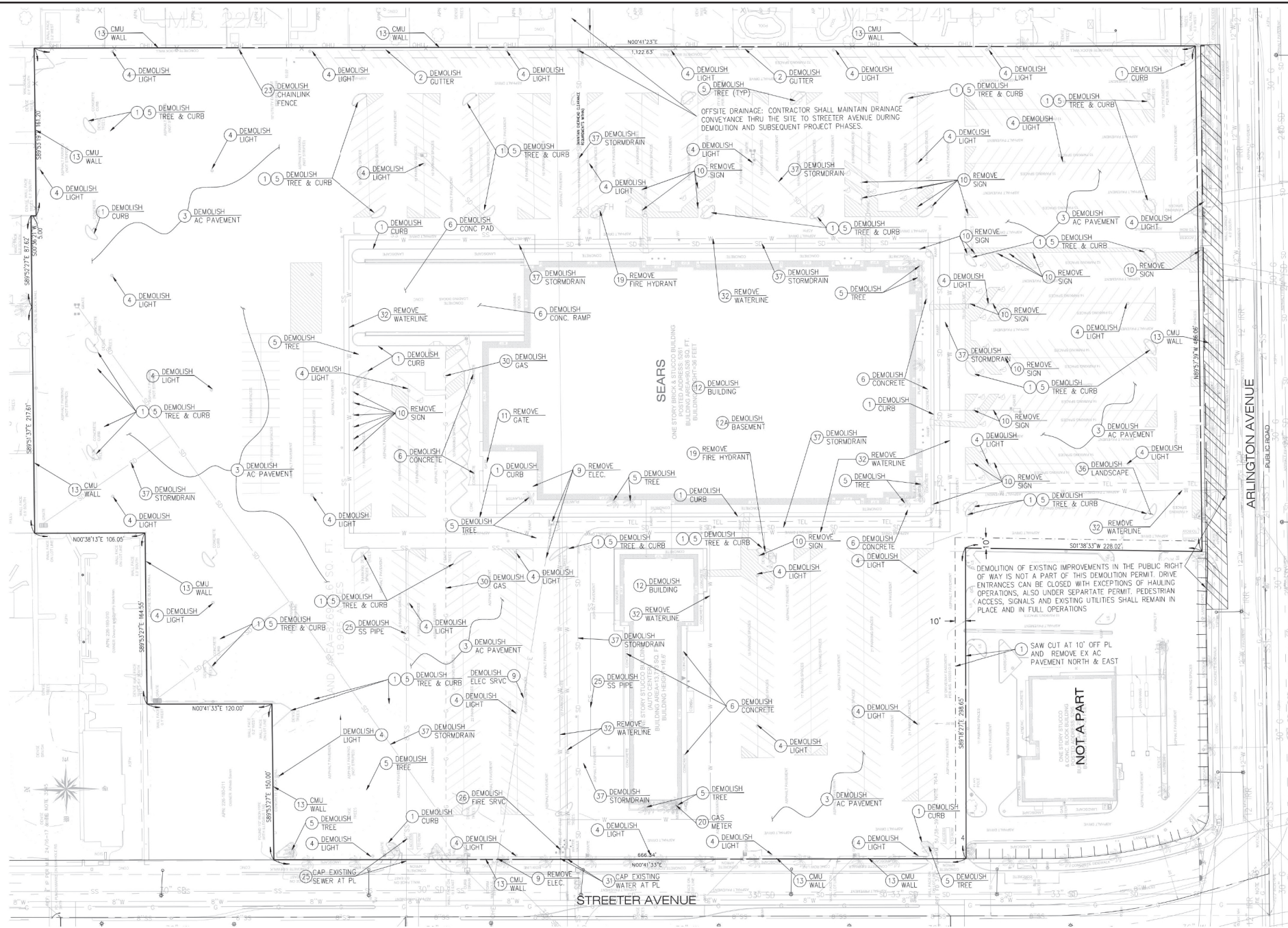
Source: Architects Orange Aug 5, 2022.

NTS

**Figure 3.0-12 Existing Site Conditions**  
Arlington Mixed Use

C2.0





**GENERAL DEMOLITION NOTES:**

- THIS WORK IS INTENDED TO INCLUDE DEMOLITION AND REMOVAL OF CONSTRUCTION INDICATED AND DISCONNECTION, CAPPING AND/OR REMOVAL OF AFFECTED UTILITIES. THE ORDER OR PHASE OF REMOVALS SHALL BE CONTRACTOR MEANS AND METHODS MEETING PERMIT REQUIREMENTS BY THE CITY AND UTILITY COMPANIES. CONTRACTOR SHALL PLAN ACTIVITIES OR PHASES ACCORDINGLY.
1. THE CONTRACTOR SHALL DEMOLISH AND REMOVE ALL EXISTING STRUCTURES AND APPURTENANCES AS INDICATED ON THESE PLANS IN AN ORDERLY AND CAREFUL MANNER.
  2. PRIOR TO DEMOLITION, THE CONTRACTOR SHALL VERIFY THE CONDITIONS AND REPORT ANY DISCREPANCY TO THE ENGINEER PRIOR TO START OF DEMOLITION.
  3. ALL DEBRIS FROM THE DEMOLITION WORK SHALL BE REMOVED FROM THE SITE AND DISPOSED OF AT A DUMP SITE APPROVED BY THE CITY OF RIVERSIDE.
  4. THE CONTRACTOR SHALL OBTAIN ALL NECESSARY PERMITS AND HAUL ROUTE APPROVALS FOR THE DEMOLITION WORK.
  5. ALL DEBRIS SHALL BE WET OR COVERED AT TIME OF HANDLING TO PREVENT DUST.
  6. CALL INSPECTOR OF RECORD DEPARTMENT FOR INSPECTION AT REQUIRED TIMES INCLUDING PREDEMOLITION, PEDESTRIAN PROTECTION, SEWER CAPPING, BACKFILLING, FINAL INSPECTIONS, ETC.
  7. REMOVE DEMOLISHED MATERIALS FROM SITE AS WORK PROGRESSES DAILY. LEAVE SITE IN CLEAN CONDITION. CONTACT CITY OF RIVERSIDE FOR REQUIREMENTS FOR DISPOSAL OF DEMOLITION DEBRIS.
  8. CONDUCT DEMOLITION TO MINIMIZE INTERFERENCE WITH ADJACENT STRUCTURES AND PEDESTRIAN ACCESS TO ADJACENT STRUCTURES.
  9. PROVIDE, ERECT, AND MAINTAIN TEMPORARY BARRIERS, SECURITY DEVICES, TRAFFIC CONTROL SIGNAGE AND PERSONNEL DURING WORK PERFORMED ADJACENT TO OR WITHIN PEDESTRIAN OR VEHICLE TRAVELWAYS AS REQUIRED BY CODE. WHEN LOCATED IN PUBLIC RIGHT-OF-WAY, IT MUST BE APPROVED AND INSTALLED UNDER USE OF PUBLIC PROPERTY PERMIT ISSUED BY THE CITY OF RIVERSIDE.
  10. CONDUCT OPERATIONS WITH MINIMUM INTERFERENCE TO PUBLIC OR PRIVATE ACCESS WAYS. MAINTAIN PROTECTED INGRESS AND EGRESS AT ALL TIMES. DO NOT CLOSE OR OBSTRUCT ROADWAYS OR PEDESTRIAN SIDEWALKS WITHOUT PERMISSION OF OWNER'S REPRESENTATIVE. TRAFFIC CONTROL PLAN IS REQUIRED AND SHOULD BE APPROVED BY THE CITY OF RIVERSIDE.
  11. BURNING OF MATERIALS AND/OR USE OF EXPLOSIVES ARE NOT PERMITTED.
  12. DEMOLITION SHALL BE WITHIN THE LIMITS OF WORK, UNLESS NOTED OTHERWISE.
  13. CONTRACTOR SHALL CONTACT ENGINEER IMMEDIATELY IF ANY ITEMS NOT SHOWN ON THE PLANS REQUIRE REMOVAL. FAILURE TO DO SO DOES NOT RELIEVE CONTRACTOR OF RESPONSIBILITY AND COST FOR REMOVING ITEMS REQUIRED.
  14. LOCATION OF ALL UNDERGROUND UTILITIES SHOWN ARE APPROXIMATE. CONTRACTOR IS RESPONSIBLE FOR REPAIR OF ANY DAMAGE CAUSED TO EXISTING UTILITIES AND UTILITY STRUCTURES THAT ARE TO REMAIN.
  15. EXISTING UNDERGROUND UTILITIES AND IMPROVEMENTS ARE SHOWN IN THEIR APPROXIMATE LOCATIONS BASED UPON RECORD INFORMATION AVAILABLE AT THE TIME OF PREPARATION OF PLANS. NO GUARANTEE IS MADE AS TO THE ACCURACY OR COMPLETENESS OF THE INFORMATION SHOWN. THE CONTRACTOR SHALL COORDINATE WITH UTILITY COMPANIES CONCERNING THE REMOVAL OF UTILITIES IN ADVANCE OF DEMOLITION ON THESE PLANS. ANY ADDITIONAL COSTS INCURRED AS A RESULT OF CONTRACTOR'S FAILURE TO VERIFY LOCATIONS OF EXISTING UTILITIES PRIOR TO BEGINNING OF CONSTRUCTION IN THEIR VICINITY SHALL BE BORNE BY THE CONTRACTOR AND ASSUMED INCLUDED IN THE CONTRACT.
  16. THE CONTRACTOR SHALL ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS, INCLUDING SAFETY OF ALL PERSONS AND PROPERTY, DURING THE COURSE OF CONSTRUCTION OF THIS PROJECT. THIS REQUIREMENT SHALL APPLY CONTINUOUSLY, AND SHALL NOT BE LIMITED TO NORMAL WORKING HOURS. THE CONTRACTOR SHALL DEFEND, INDEMNIFY AND HOLD THE OWNER AND ENGINEER HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT.
  17. DEMOLITION WORK SHALL NOT START UNLESS REQUIRED PEDESTRIAN PROTECTION STRUCTURES (IF REQUIRED) ARE IN PLACE.
  18. ALL WORK WILL BE IN ACCORDANCE WITH 2019 CBC, TITLE 24 OF CALIFORNIA CODE OF REGULATION AND ALL APPLICABLE CODE AND ORDINANCE AND REGULATIONS. NOTHING HEREIN SHALL BE INTERPRETED TO THE CONTRARY.
  19. A PRE-DEMOLITION COORDINATION MEETING SHALL BE HELD WITH OWNER'S REPRESENTATIVE PRIOR TO COMMENCEMENT OF DEMOLITION ACTIVITIES.
  20. CONTRACTOR TO COORDINATE WITH OWNER'S REPRESENTATIVE AND RESPECTIVE UTILITY COMPANY AS REQUIRED FOR SCHEDULE OF DEACTIVATION, POINTS OF DISCONNECTION, CAPPING AND/OR RECONNECTION OF UTILITY LINES.
  21. CONTRACTOR TO PROVIDE FOR THE TRANSPORT OF EXISTING STORM DRAIN AND WATER FLOWS IN SERVICES TO BE DEMOLISHED OR RELOCATED UNTIL THE RESPECTIVE REPLACEMENT UTILITIES HAVE BEEN CONSTRUCTED.
  22. PROTECTION FENCE WITH ATTACHED WINDSCREEN MATERIAL SHALL BE INSTALLED AROUND THE SITE, ALONG THE LIMIT OF DEMOLITION. H=6'

**NOTES:**

- UTILITIES PER RECORD PLANS.
1. CONTRACTOR TO CALL UNDERGROUND SERVICE ALERT OF CALIFORNIA AND PROCEED WITH CAUTION.
  2. SEPARATE PERMIT REQUIRED FOR WORK IN THE CITY RIGHT OF WAY, AND REMOVAL OF STREET TREES.
  3. SEE GENERAL NOTE 20 FOR COORDINATION WITH UTILITY COMPANY.
  4. CONTRACTOR TO REMOVE EXISTING IRRIGATION SYSTEM.
  5. CERTIFIED ARBORIST TO BE ON SITE DURING EXCAVATION AND TO PHOTO DOCUMENT ANY ROOT PRUNING. CLEAN TOOLS TO BE USED TO MINIMIZE SPREAD OF DISEASE TO TREE ROOTS. CAMBISTAT OR SIMILAR PLANT GROWTH REGULATOR TO BE UTILIZED.

**DEMOLITION CONSTRUCTION NOTES:**

- |                              |  |                                |  |  |
|------------------------------|--|--------------------------------|--|--|
| 1 DEMOLISH CURB & GUTTER     | 8 PROTECT IN PLACE FENCE                       | 15 PROTECT IN PLACE SEWER LINE | 22 REMOVE POWER POLE   | 30 REMOVE GAS LINE   |
| 2 DEMOLISH CONCRETE GUTTER   | 9 REMOVE ELECTRICAL EQUIP & ELECTRICAL SERVICE | 16 DEMOLISH TRASH ENCLOSURE    | 23 REMOVE CHAINLINK FENCE  | 31 CAP WATER LINE AT PROPERTY LINE   |
| 3 DEMOLISH ASPHALT CONCRETE  | 10 REMOVE SIGN                                 | 17 REMOVE UTILITY VAULT        | 25 REMOVE ON-SITE SANITARY SEWER, PLUG AND ABANDON AT STREETER RIGHT OF WAY. | 32 REMOVE WATER LINE   |
| 4 REMOVE LIGHT               | 11 REMOVE GATE                                 | 18 REMOVE ELECTRICAL CABINET   | 26 REMOVE FIRE SERVICE MAIN, DODA TO REMAIN TEMPORARY                        | 33 CAP DRAIN INLET   |
| 5 REMOVE TREE                | 12 DEMOLISH BUILDING                           | 19 REMOVE FIRE HYDRANT         | 27 DEMOLISH GUARD POST   | 34 REMOVE BACKFLOW PREVENTER   |
| 6 DEMOLISH CONCRETE          | 12a DEMOLISH BASEMENT, AREA= 85,634SF          | 20 REMOVE GAS SERVICE          | 28 PROTECT IN PLACE RETAINING WALL   | 36 REMOVE LANDSCAPE  |
| 7 DEMOLISH CONCRETE SIDEWALK | 13 DEMOLISH CMU PERIMETER WALL                 | 21 REMOVE UTILITY POLE         | 29 CAP GAS LINE AT PROPERTY LINE   | 37 DEMOLISH AND REMOVE EXISTING SD TO PROPERTY LINE. MAINTAIN CATCH BASIN'S AT R.O.W. AND PROTECT LATERALS' AT PUBLIC R.O.W. |

Source: Architects Orange Aug 5, 2022.

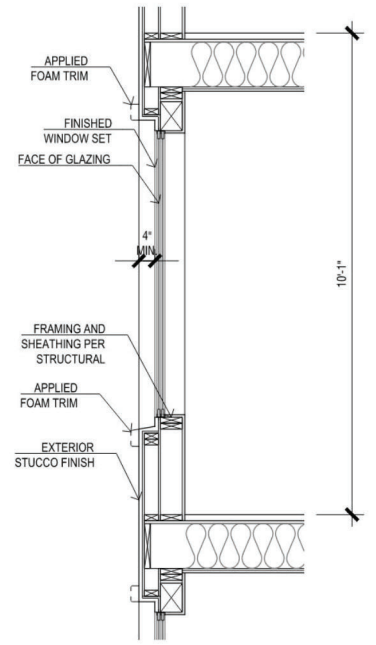
**Figure 3.0-13 Proposed Demolition Plan  
Arlington Mixed Use**

NTS





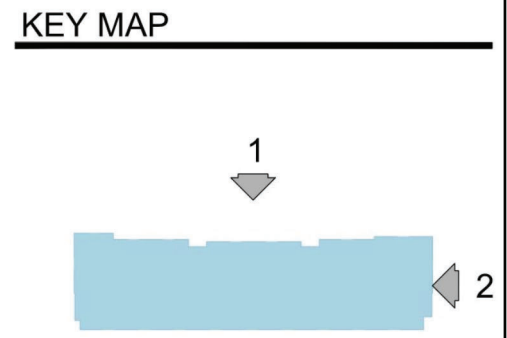
FRONT ELEVATION 1



**STUCCO WINDOW - RECESSED 4"**  
 (TO OCCUR ON WINDOWS FACING PUBLIC RIGHT OF WAY)  
 SCALE: 1/2" = 1'-0"



LEFT ELEVATION 2



H:\2022\22-0172\GIS\PRO\building\_elevations.aprx Map created 23 Oct 2023

Source: Architects Orange June 15, 2023.

**Figure 3.0-14 Proposed Elevations [Garden Style Type III - Front & Left]**  
 Arlington Mixed Use

NTS







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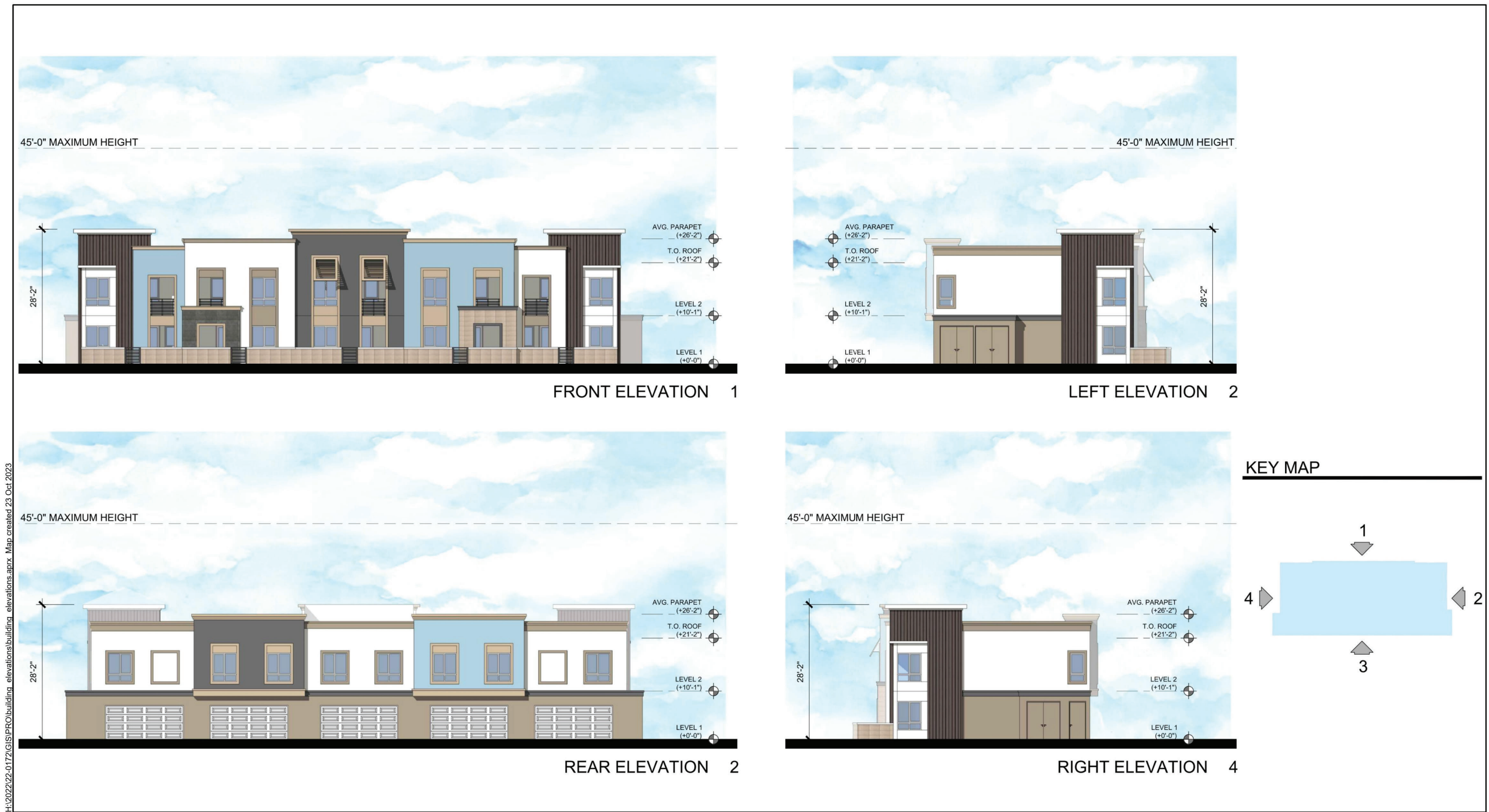
Source: Architects Orange June 15, 2023.

**Figure 3.0-15 Proposed Elevations [Garden Style Type III - Rear & Right]**

Arlington Mixed Use

NTS





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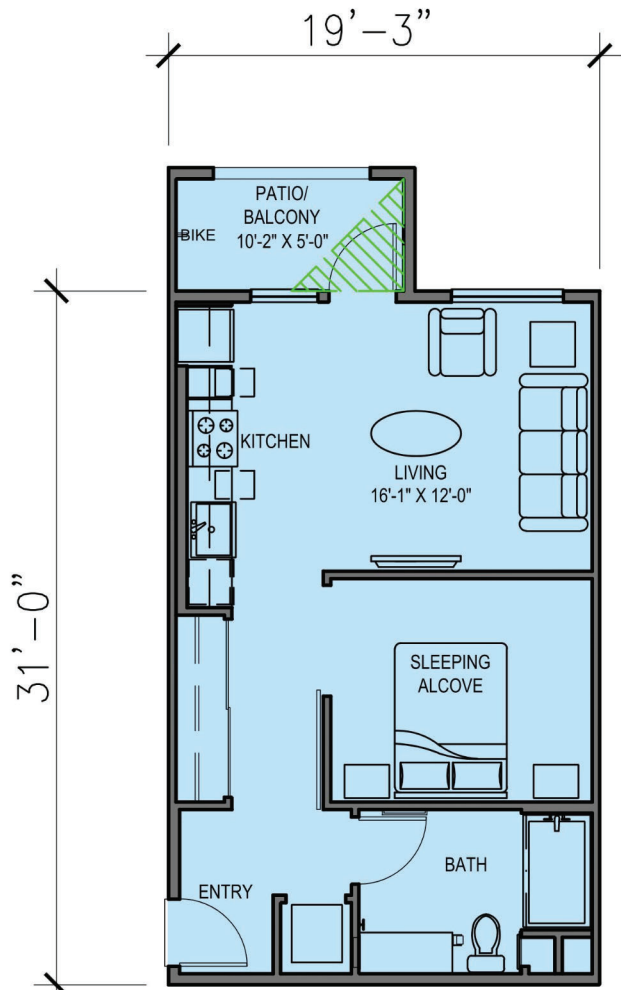
Source: Architects Orange June 15, 2023.

NTS

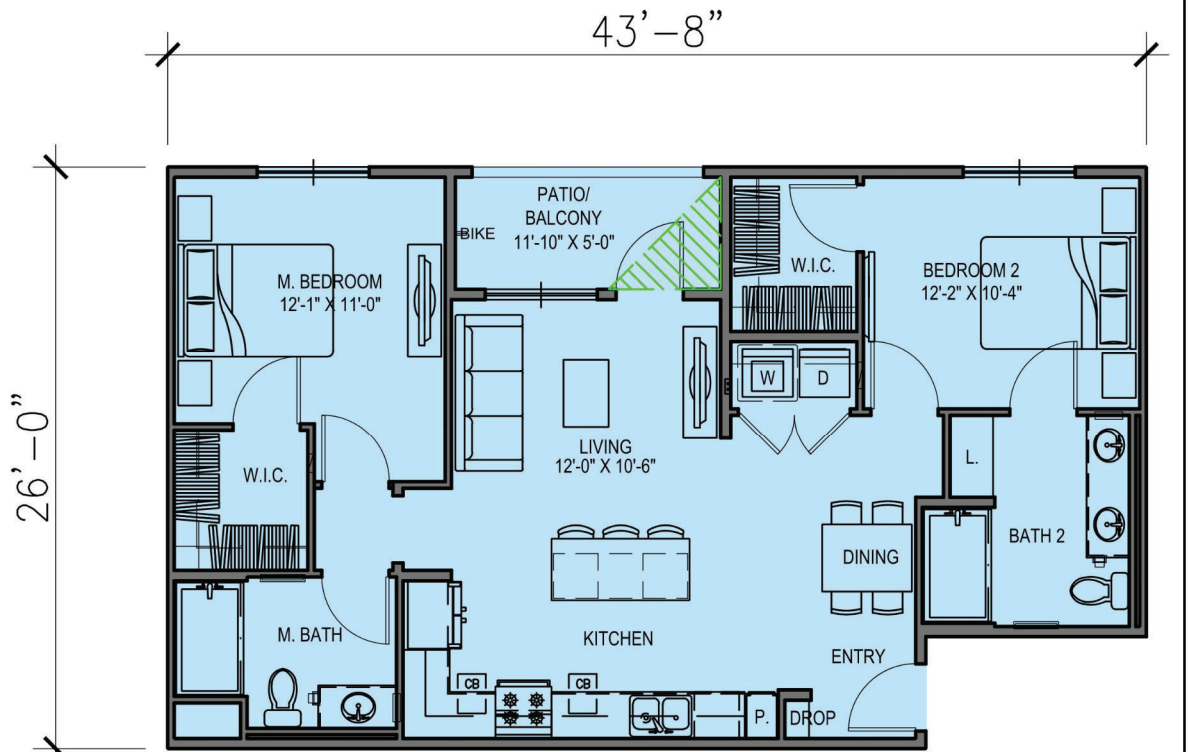
**Figure 3.0-16 Proposed Elevations [Townhomes]**  
Arlington Mixed Use



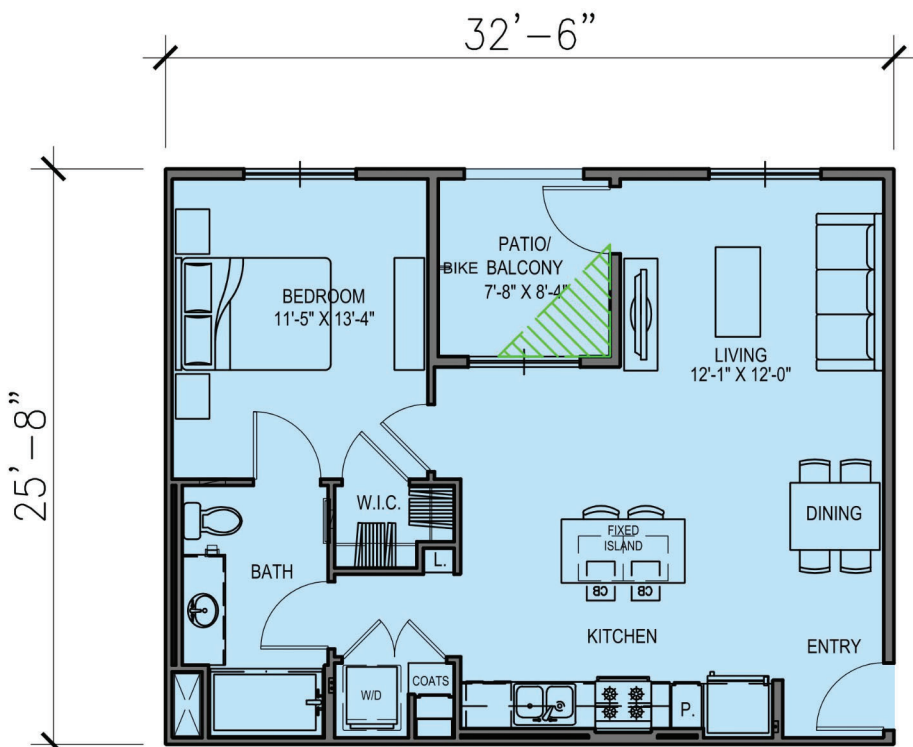




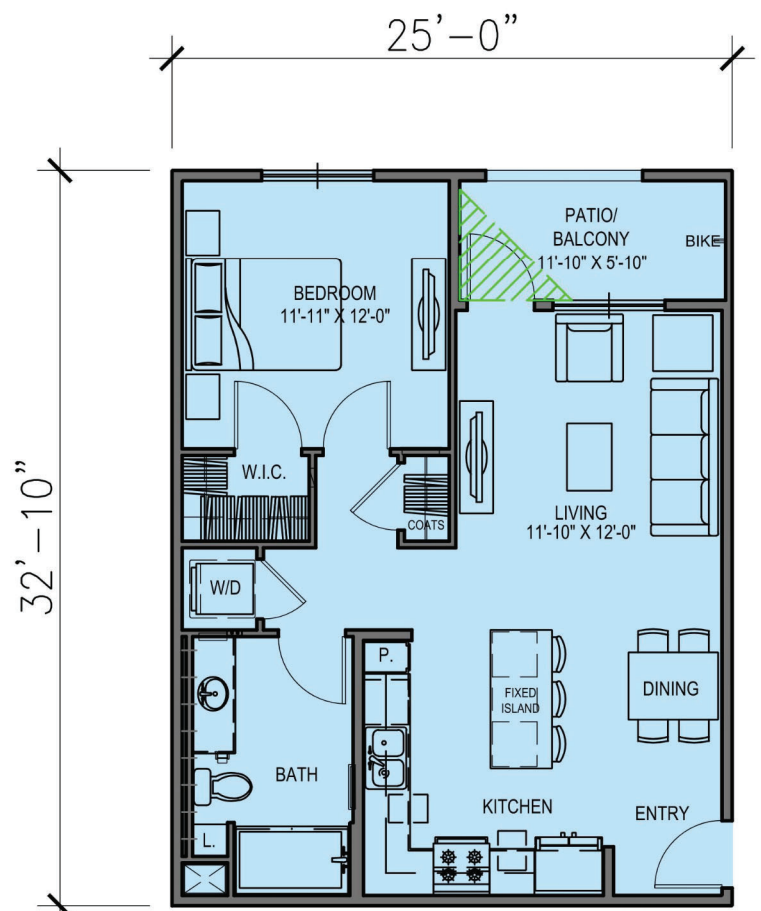
**UNIT S1 - OPTION 1**  
 STUDIO - 1 BATH  
 NET LIVABLE: 597 SQ. FT.  
 PATIO/DECK : 51 SQ. FT.



**UNIT B1 - OPTION 1**  
 2 BED - 2 BATH CARRIAGE  
 NET LIVABLE: 1015 SQ. FT.  
 PATIO/DECK : 59 SQ. FT.



**UNIT A1 - OPTION 1**  
 1 BED - 1 BATH  
 NET LIVABLE: 770 SQ. FT.  
 PATIO/DECK : 64 SQ. FT.



**UNIT A2 - OPTION 1**  
 1 BED - 1 BATH  
 NET LIVABLE: 745 SQ. FT.  
 PATIO/DECK : 64 SQ. FT.

**LEGEND**



5'x5' MIN. OPEN SPACE DIMENSION

H:\2023\22-0172\GIS\PRO\proposed floor plan\proposed floor plan.aprx. Map created 23 Oct 2023

Sources: Architects Orange June 15, 2023.

**Figure 3.0-17 Proposed Floor Plans [Garden Style Plans 1 of 2]**

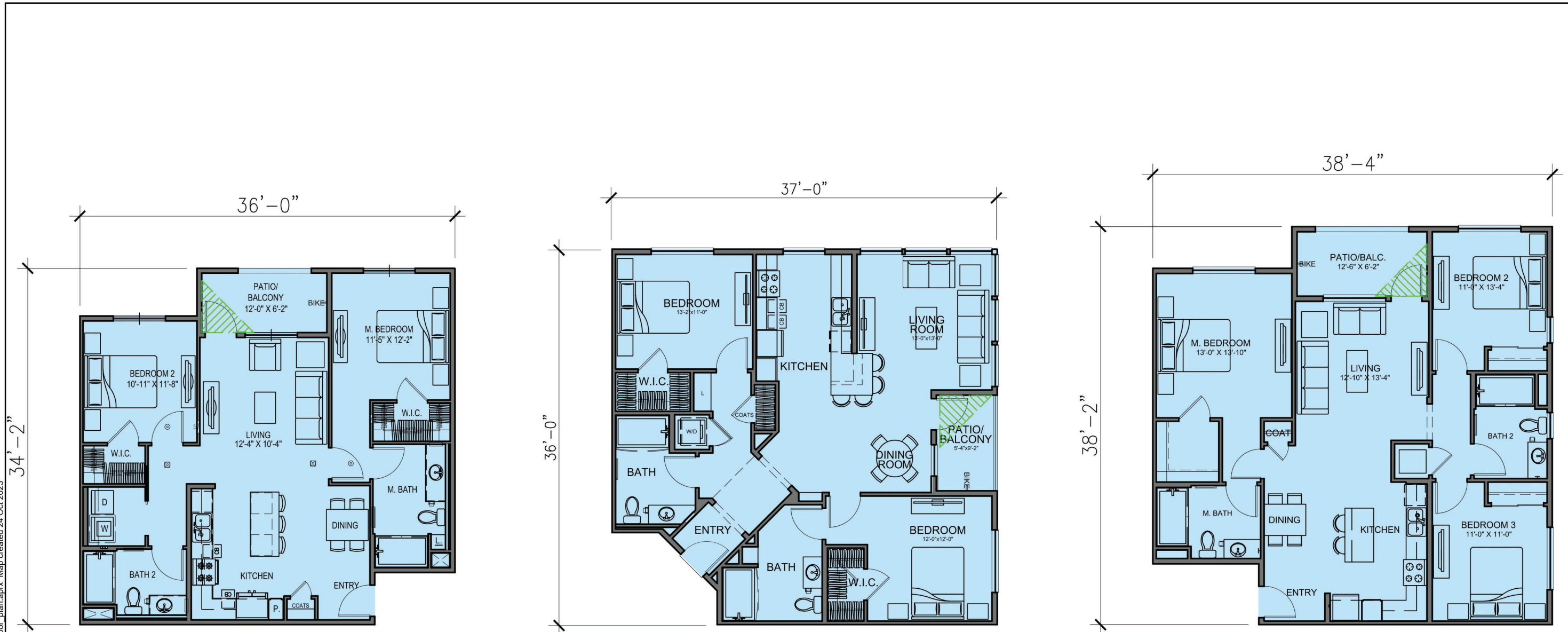
NTS

Arlington Mixed Use





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**UNIT B2 - OPTION 1**  
 2 BED - 2 BATH  
 NET LIVABLE: 1054 SQ. FT.  
 PATIO/DECK : 69 SQ. FT.

**UNIT B4**  
 2 BEDROOM - 2 BATH  
 UNIT AREA: 1205 SQ. FT.  
 PATIO/ BALCONY: 50 SQ. FT.

**UNIT C1 - OPTION 1**  
 3 BED - 2 BATH  
 NET LIVABLE: 1265 SQ. FT.  
 PATIO/DECK : 77 SQ. FT.

**LEGEND**

 5'x5' MIN. OPEN SPACE DIMENSION

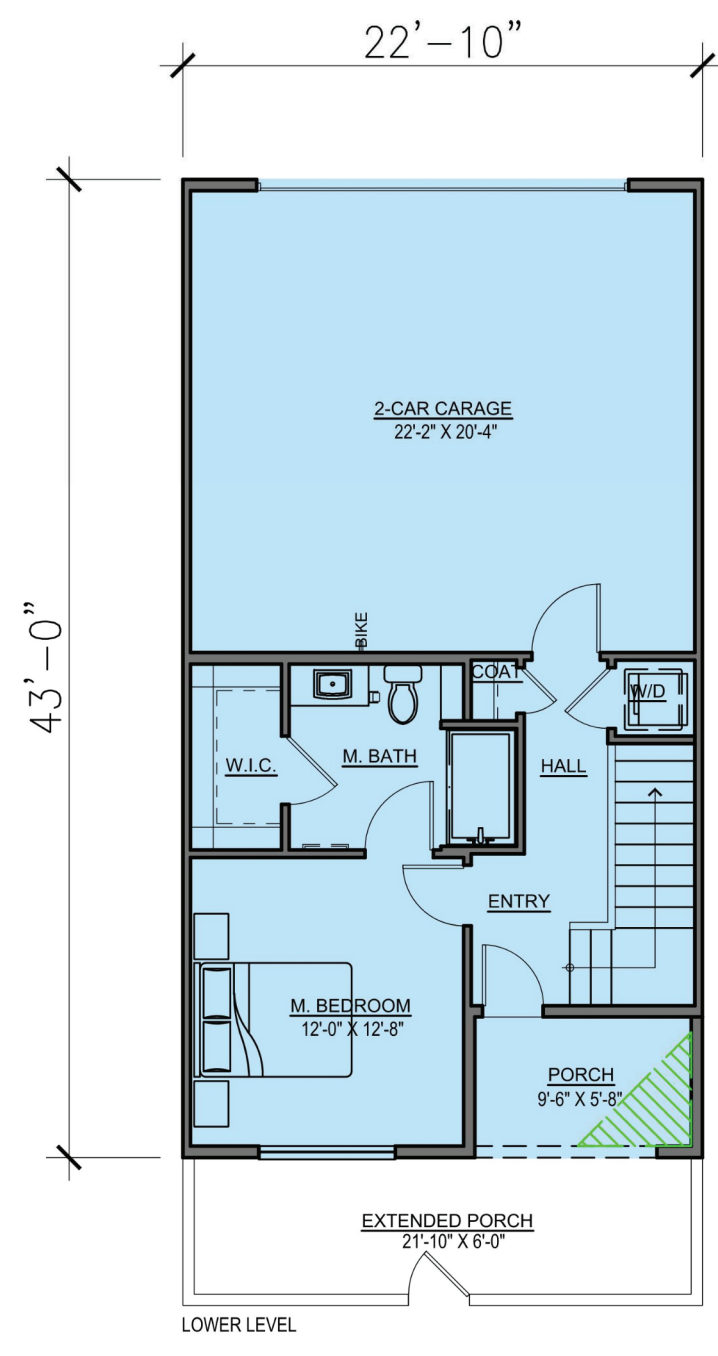
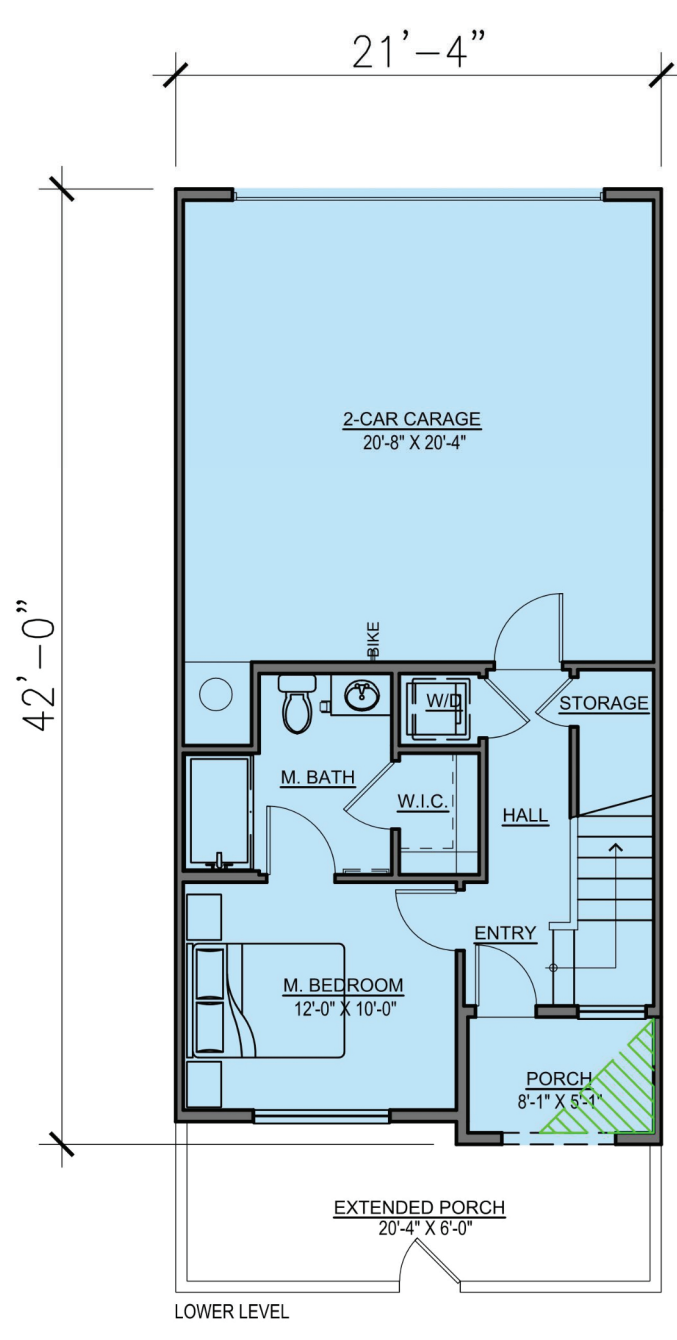
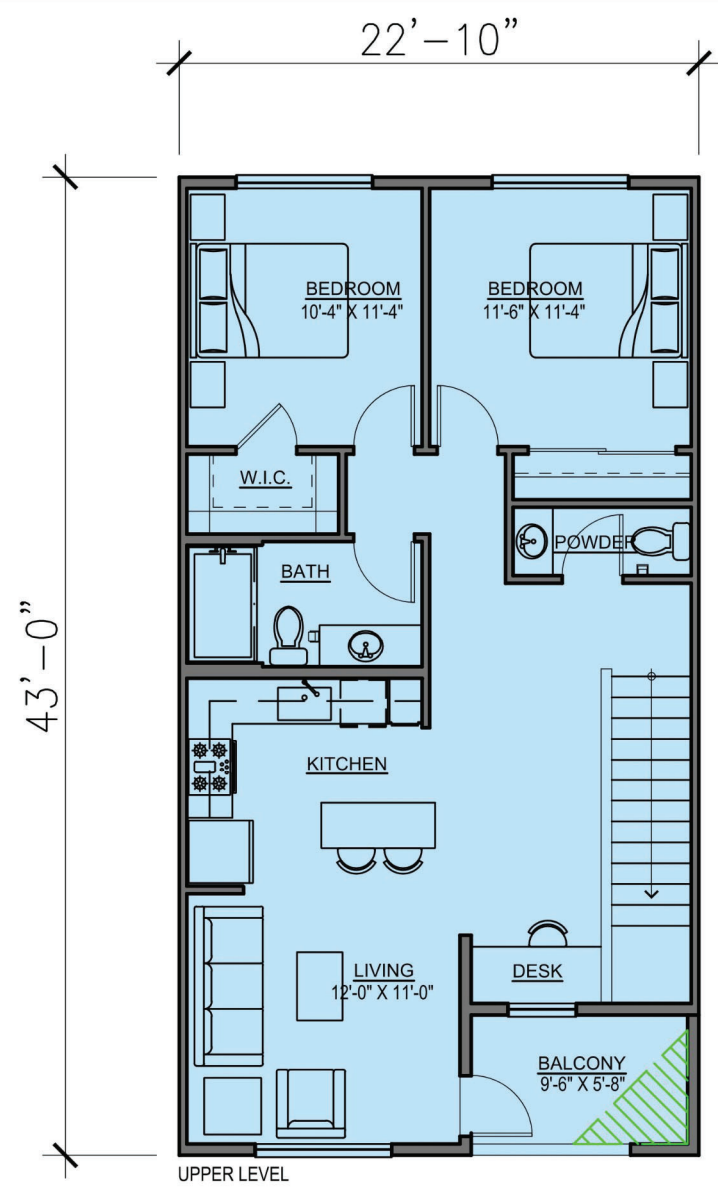
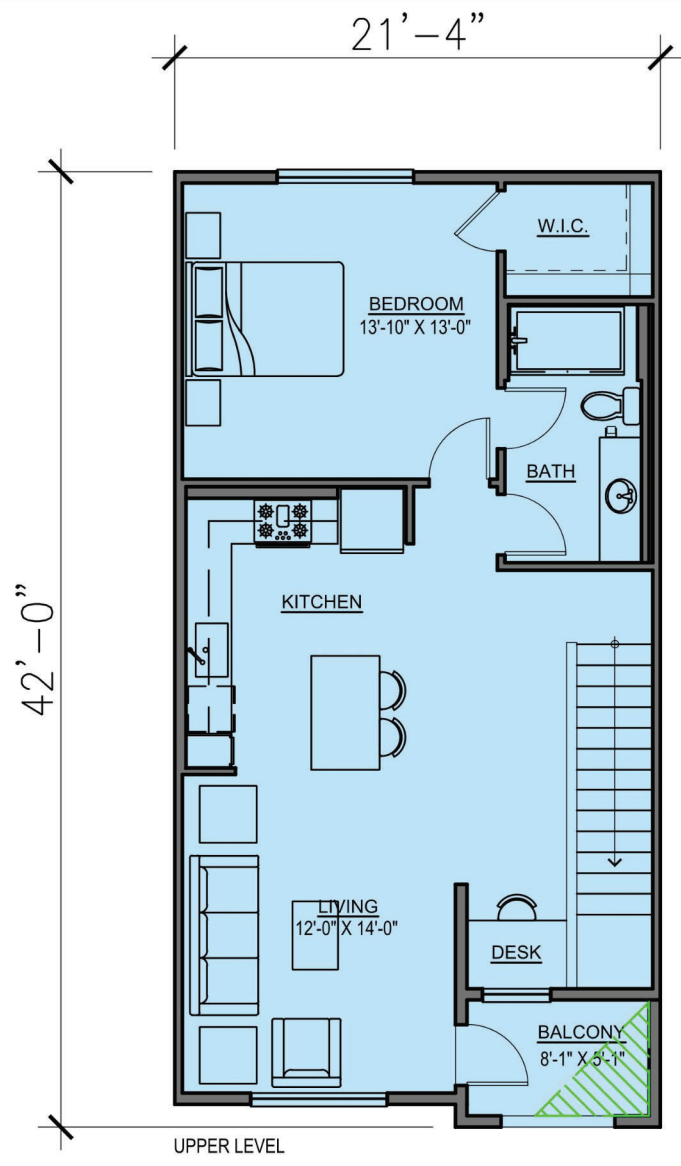
Source: Architects Orange June 15, 2023.

**Figure 3.0-18 Proposed Floor Plans [Garden Style Plans 2 of 2]**

Arlington Mixed Use

NTS

H:\2021\22-0172\GIS\PRO\proposed\_floor\_plan\proposed\_floor\_plan.aprx Map created 24 Oct 2023



**LEGEND**  
 5'x5' MIN. OPEN SPACE DIMENSION

**UNIT B3 - TOWNHOME**  
 2 BED - 2 BATH  
 NET LIVABLE: 1162 SQ. FT.  
 PATIO/DECK : 215 SQ. FT.

**UNIT C2**  
 3 BED - 2.5 BATH  
 NET LIVABLE: 1307 SQ. FT.  
 PATIO/DECK : 243 SQ. FT.

Sources: Architects Orange June 15, 2023.

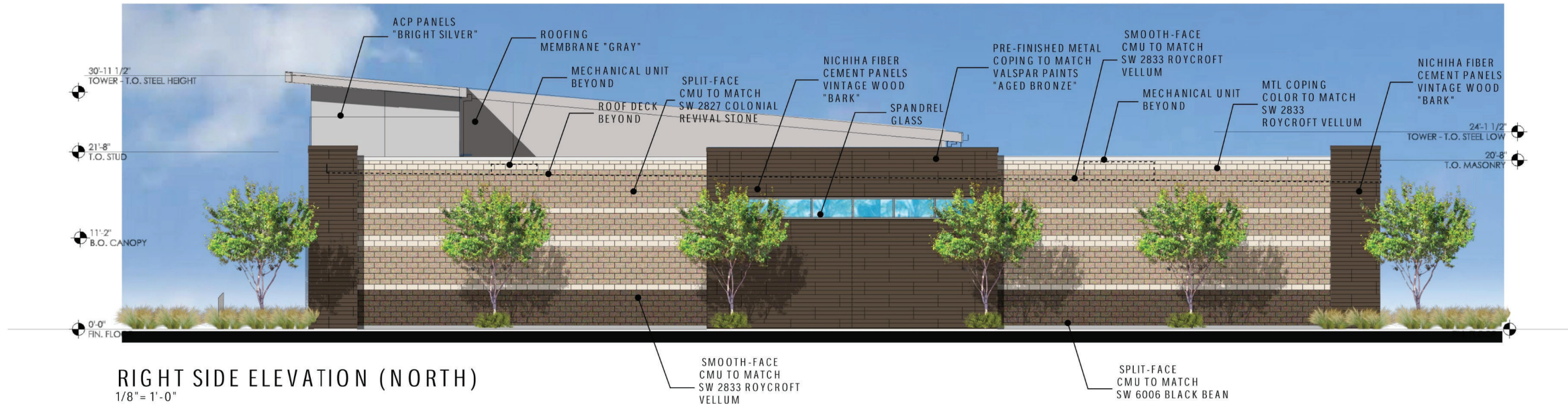
**Figure 3.0-19 Proposed Floor Plans [Townhome Plans]**

NTS

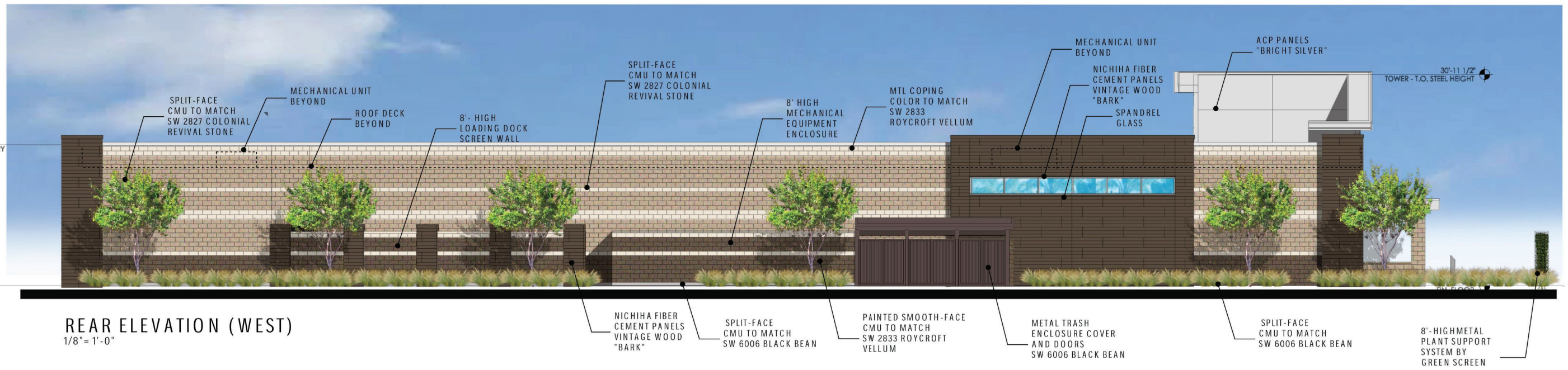
Arlington Mixed Use







**RIGHT SIDE ELEVATION (NORTH)**  
1/8" = 1'-0"



**REAR ELEVATION (WEST)**  
1/8" = 1'-0"

H:\2022\22-0172\GIS\PRO\building\_elevations\building\_elevations.aprx Map created 24 Oct 2023

Source: Conceptual Exterior Elevations, ALDI Inc. July 21, 2023.

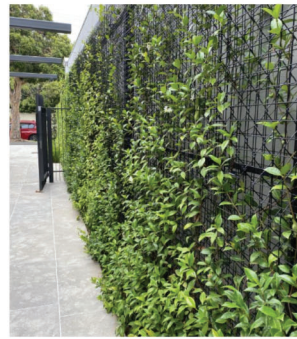
**Figure 3.0-20 Proposed Elevations ALDI**

NTS

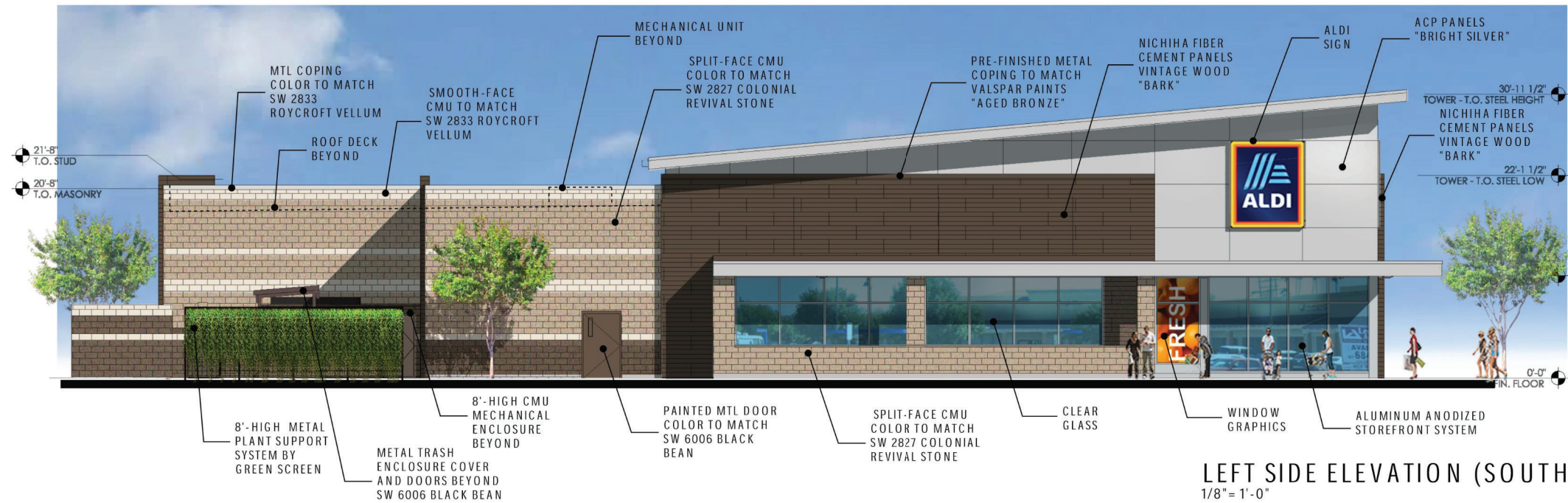
**Right & Rear**  
Arlington Mixed Use



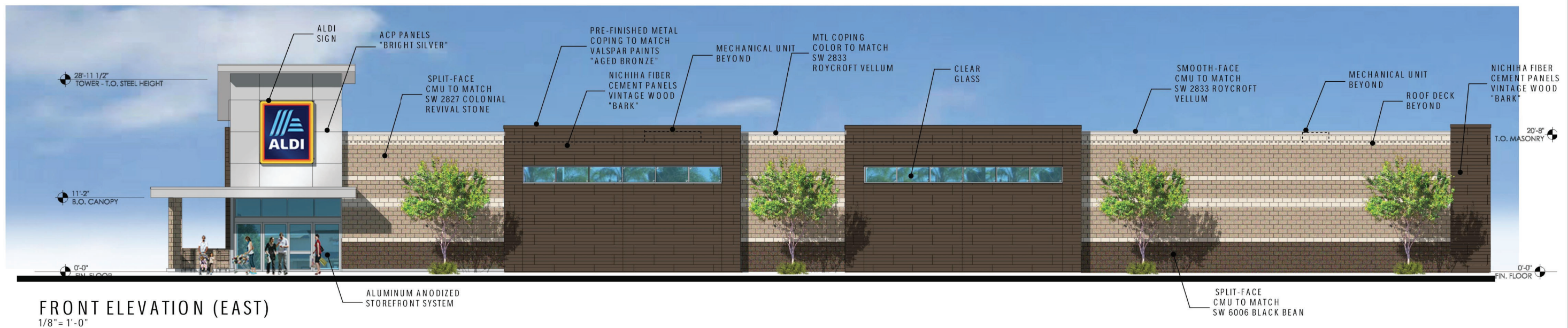




METAL PLANT SUPPORT SYSTEM PRECEDENT IMAGES



LEFT SIDE ELEVATION (SOUTH)  
1/8" = 1'-0"



FRONT ELEVATION (EAST)  
1/8" = 1'-0"

H:\2022\22-0172\GIS\PRO\building\_elevations.aprx Map created 24 Oct 2023

Source: Conceptual Exterior Elevations, ALDI Inc. July 21, 2023.

**Figure 3.0-21 Proposed Elevations ALDI**  
**Left & Front**  
Arlington Mixed Use

NTS

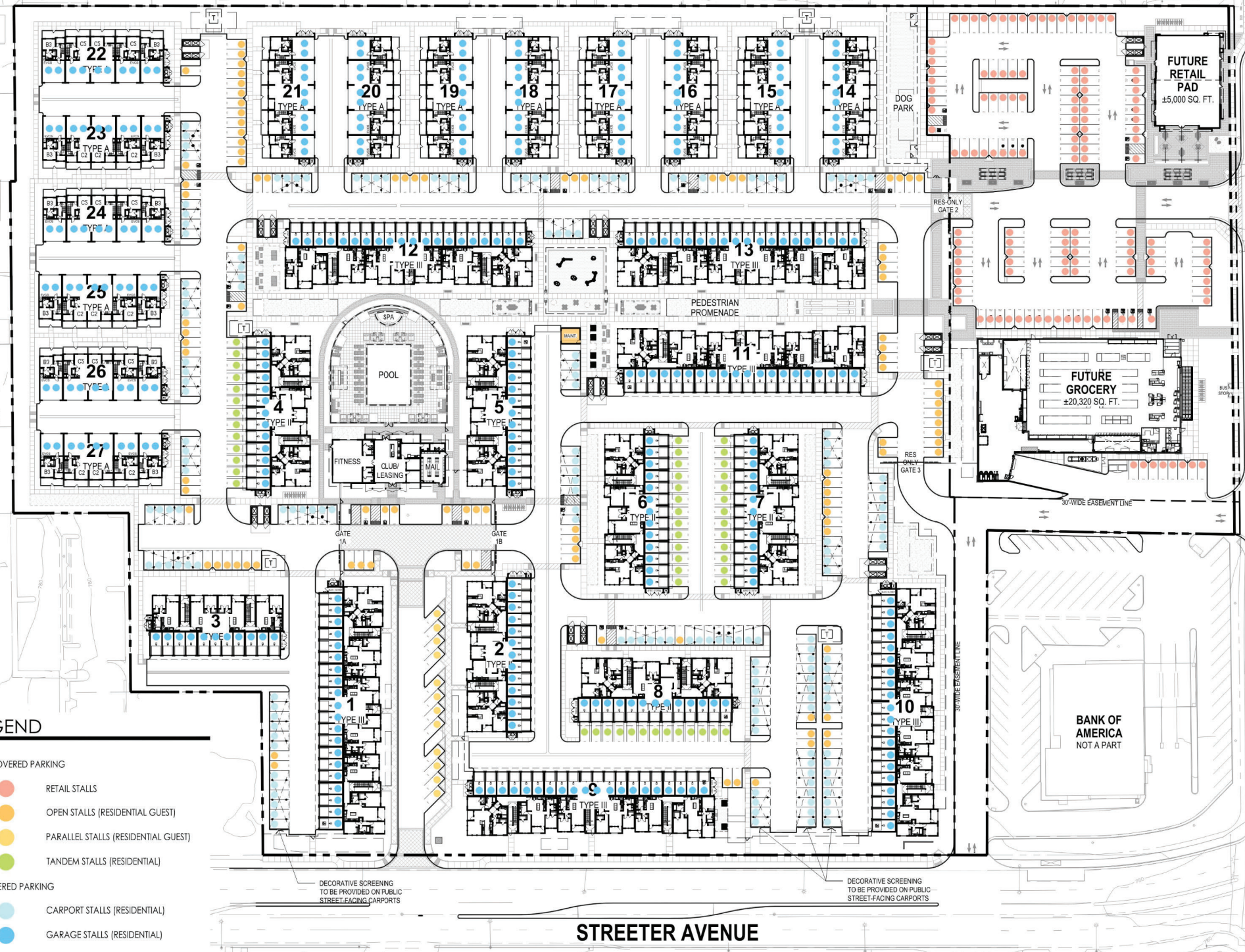




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**LEGEND**

- UNCOVERED PARKING
  - RETAIL STALLS
  - OPEN STALLS (RESIDENTIAL GUEST)
  - PARALLEL STALLS (RESIDENTIAL GUEST)
  - TANDEM STALLS (RESIDENTIAL)
- COVERED PARKING
  - CARPORT STALLS (RESIDENTIAL)
  - GARAGE STALLS (RESIDENTIAL)



ARLINGTON AVENUE

STREETER AVENUE



VEHICLE PARKING - REQUIRED						
<b>RESIDENTIAL PARKING REQUIRED (9'-0"X18'-0")</b>						
UNIT TYPE	NUMBER OF UNITS	REQUIRED RATIO	TOTAL STALLS REQUIRED			
STUDIOS	18	1.0	18			
1 BEDROOM	152	1.5	228			
2 BEDROOM	158	2.0	316			
3 BEDROOM	60	2.0	120			
<b>TOTAL UNITS</b>	<b>388</b>					
<b>TOTAL RESIDENTIAL PARKING REQUIRED:</b>			<b>682</b>			
COVERED RESIDENTIAL PARKING REQUIRED:		75%	512			
<b>PARKING RATIO:</b>			<b>1.8</b>			
<b>RETAIL PARKING REQUIRED (9'-0"X18'-0")</b>						
PARKING TYPE PER USE	TOTAL FLOOR AREA (SQ. FT.)	RATIO PER SQ. FT.	STALLS REQUIRED			
GROCERY	20,320	1 PER 250	82			
RETAIL PAD	5,000	1 PER 100	50			
<b>TOTAL RETAIL PARKING REQUIRED:</b>			<b>132</b>			
<b>DESIGNATED USPS STALL REQUIRED (9'-0"X18'-0")</b>			<b>1</b>			
<b>ACCESSIBLE STALLS REQUIRED (MIN. 9'-0"X18'-0")</b>						
PARKING TYPE PER USE	QTY.	RATIO	REQ.	OF REQUIRED	STD.	VAN**
ADA - RESIDENTIAL COVERED*	512	2.0%	11	9	2	
ADA - RESIDENTIAL GUEST*	170	5.0%	9	7	2	
ADA - RETAIL*	132	5.0%	7	6	1	
<b>TOTAL:</b>			<b>27</b>	<b>22</b>	<b>5</b>	
<b>TOTAL ACCESSIBLE STALLS REQUIRED:</b>						<b>27</b>
<b>EVCS STALLS REQUIRED (MIN. 9'-0"X18'-0")</b>						
PARKING TYPE PER USE	QTY.	RATIO	REQ.	ACCESSIBLE REQUIRED***		
EVCS - RESIDENTIAL COVERED*	512	10.0%	52	3		
EVCS - RESIDENTIAL GUEST*	170	10.0%	17	1		
EVCS - RETAIL*	132	10.0%	14	1		
<b>TOTAL EVCS STALLS REQUIRED:</b>			<b>83</b>			
<small>*NOTE: INCLUDED IN PARKING COUNT</small>						
<small>**PROVIDE (1) VAN ACCESSIBLE STALL FOR EVERY 8 ACCESSIBLE STALLS PROVIDED</small>						
<small>***PROVIDE (1) ACCESSIBLE STALL FOR EVERY 25 EVCS STALLS PROVIDED</small>						
<b>TOTAL STALLS REQUIRED</b>				<b>815</b>		

VEHICLE PARKING - PROVIDED						
<b>RESIDENTIAL</b>						
PARKING TYPE	STD.	ADA		EVCS		TOTAL
		STD.	VAN	STD.	ADA	
GARAGE STALLS	307	6		36		349
CARPORT STALLS	150	3	2	17	1	173
OPEN STALLS	72	7	2	13	2	96
DIAGONAL STALLS	12					12
TANDEM STALLS	52					52
USPS STALL	1					1
<b>SUBTOTAL</b>	<b>594</b>	<b>16</b>	<b>4</b>	<b>66</b>	<b>3</b>	<b>683</b>
<b>TOTAL RESIDENTIAL PARKING PROVIDED:</b>						<b>683</b>
COVERED RESIDENTIAL PARKING PROVIDED:						522 76.4%
<b>RETAIL</b>						
PARKING TYPE	STD.	ADA		EVCS		TOTAL
		STD.	VAN	STD.	ADA	
OPEN - GROCERY LOT	50	3	1	6	1	61
OPEN - RETAIL PAD LOT	61	3		6	1	71
<b>SUBTOTAL</b>	<b>111</b>	<b>6</b>	<b>1</b>	<b>12</b>	<b>2</b>	<b>132</b>
<b>TOTAL RETAIL PARKING PROVIDED:</b>						<b>132</b>
<b>TOTAL PARKING PROVIDED:</b>						<b>815</b>
<b>BICYCLE PARKING</b>						
<b>SHORT-TERM BICYCLE PARKING</b>						
RATIO	TOTAL VEHICLE PARKING STALLS	TOTAL BICYCLE STALLS REQUIRED	TOTAL BICYCLE STALLS PROVIDED			
0.05	815	41	41			
<b>SHORT-TERM BICYCLE PARKING</b>						
RATIO	TOTAL VEHICLE PARKING STALLS	TOTAL BICYCLE STALLS REQUIRED	TOTAL BICYCLE STALLS PROVIDED			
0.05	815	41	41			

Source: Architects Orange June 15, 2023.

**Figure 3.0-22 Proposed Parking Plan**  
Arlington Mixed Use

NTS





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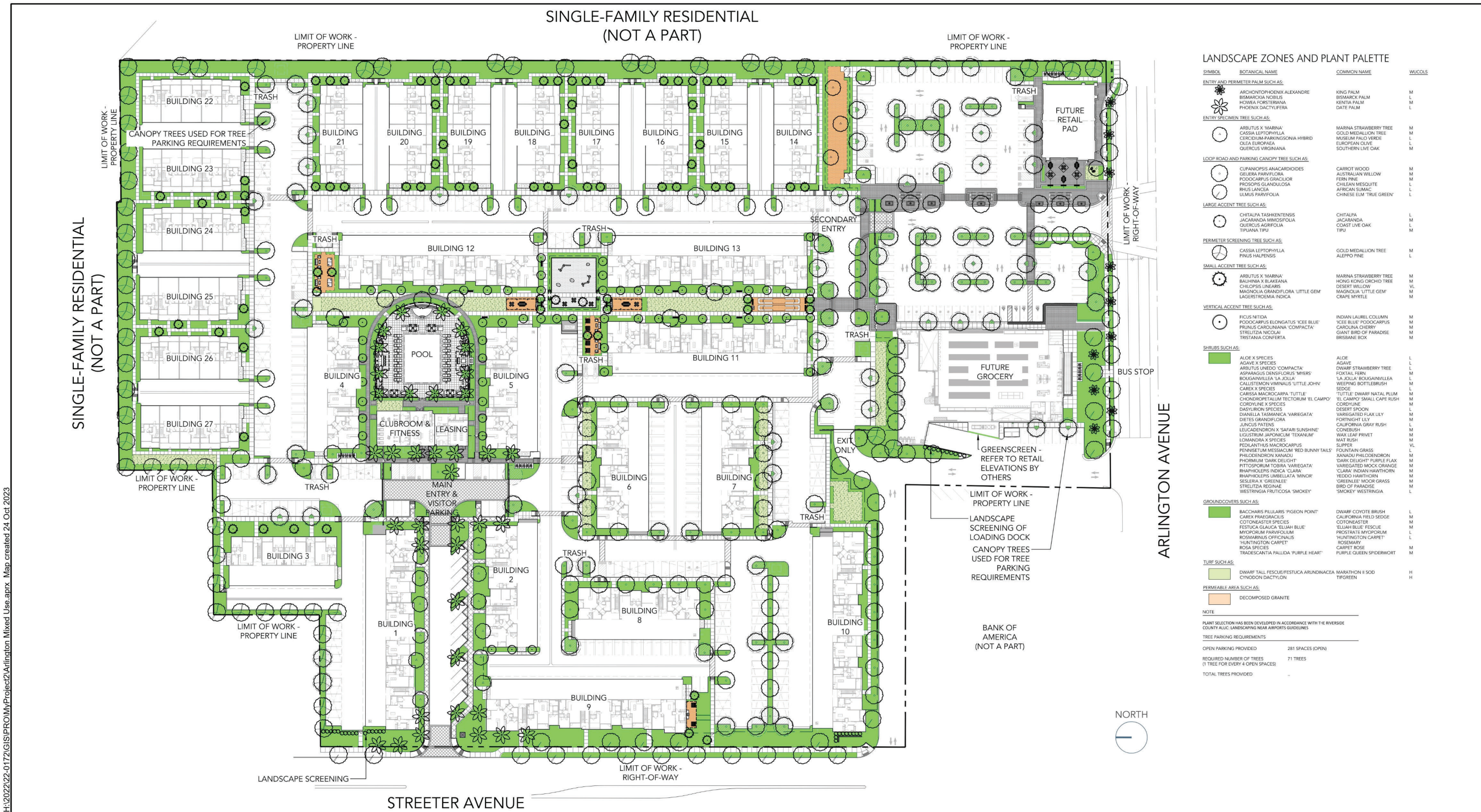
Source: Architects Orange July 24, 2023.

**Figure 3.0-23 Conceptual Landscape Plan**

Arlington Mixed Use

NTS





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Source: Architects Orange July 24, 2023.

**Figure 3.0-24 Landscaping Planting Plan**  
Arlington Mixed Use

NTS



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TREES:



WASHINGTONIA ROBUSTA  
MEXICAN FAN PALM



OLEA EUROPAEA  
EUROPEAN OLIVE



PROSOPIS CHILENSIS  
CHILEAN MESQUITE



CASSIA LEPTOPHYLLA  
GOLD MEDALLION TREE



JACARANDA MIMOSIFOLIA  
JACARANDA



PINUS CANARIENSIS  
CANARY ISLAND PINE



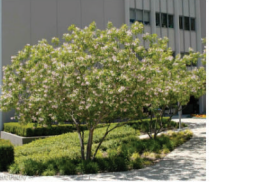
ARBUTUS X 'MARINA'  
MARINA STRAWBERRY TREE MULTI



TRISTANIA CONFERTA  
BRISBANE BOX



PODOCARPUS 'ICEE BLUE'  
ICEE BLUE YELLOW-WOOD



CHITALPA TASHKENTENSIS  
CHITALPA

SHRUBS AND BMP SHRUBS:



ALOE SPP  
ALOE



AGAVE SPP  
AGAVE



ARBUTUS UNEDO 'COMPACTA'  
DWARF STRAWBERRY TREE



ASPARGUS DENSIFLORUS 'MYERS'  
FOXTAIL FERN



BOUGAINVILLEA 'LA JOLLA'  
'LA JOLLA' BOUGAINVILLEA



CALLISTEMON VIMINALIS 'LITTLE JOHN'  
WEEPING BOTTLEBRUSH



CAREX SPP  
SEDEGE



CARISSA MACROCARPA 'TUTTLE'  
'TUTTLE' DWARF NATAL PLUM



CHONDROPETALUM TECTORUM 'EL CAMPO'  
'EL CAMPO' SMALL CAPE RUSH



CORDYLIN SPP.  
CORDYLIN



DASYLIRION SPP  
DESERT SPOON



DIANELLA TASMANICA 'VARIEGATA'  
VARIEGATED FLAX LILY



DIETES GRANDIFLORA  
FORTNIGHT LILY



JUNCUS PATENS  
CALIFORNIA GRAY RUSH



LEUCADENDRON X 'SAFARI SUNSHINE'  
CONEBUSH

Source: Architects Orange July 24, 2023.

### Figure 3.0-25 Plant Palette [1 of 2]

Arlington Mixed Use



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SHRUBS (CONTINUED)



LIGUSTRUM JAPONICUM 'TEXTANUM'  
WAX LEAF PRIVET



LOMANDRA SPP  
MAT RUSH



PEDILANTHUS MACROCARPUS  
SLIPPER



PENNISETUM MESSAIACUM 'RED BUNNY TAILS'  
FOUNTAIN GRASS



PHILODENDRON XANADU  
XANADU PHILODENDRON



PHORMIUM 'DARK DELIGHT'  
'DARK DELIGHT' PURPLE FLAX



PITTOSPORUM TOBIRA 'VARIEGATA'  
VARIEGATED MOCK ORANGE



RHAMPHILEPIS INDICA 'CLARA'  
'CLARA' INDIAN HAWTHORN



RHAMPHILEPIS UMBELLATA 'MINOR'  
YEDDO HAWTHORN



SESLERIA X 'GREENLEE'  
'GREENLEE' MOOR GRASS



STRELITZIA REGINAE  
BIRD OF PARADISE



WESTRINGIA FRUTICOSA 'SMOKEY'  
'SMOKEY' WESTRINGIA

GROUND COVERS:



BACCHARIS PILLULARIS 'PIGEON POINT'  
DWARF COYOTE BUSH



CAREX PRAEGRACILIS  
CALIFORNIA FIELD SEDGE



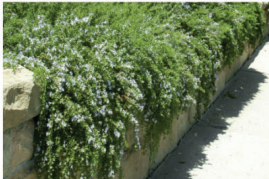
COTONEASTER SPP  
COTONEASTER



FESTUCA GLAUCA 'ELIJAH BLUE'  
'ELIJAH BLUE' FESCUE



MYOPORUM PARVIFOLIUM  
PROSTRATE MYOPORUM



ROSMARINUS OFFICINALIS 'HUNTINGTON CARPET'  
'HUNTINGTON CARPET' ROSEMARY



ROSA SPP  
CARPET ROSE



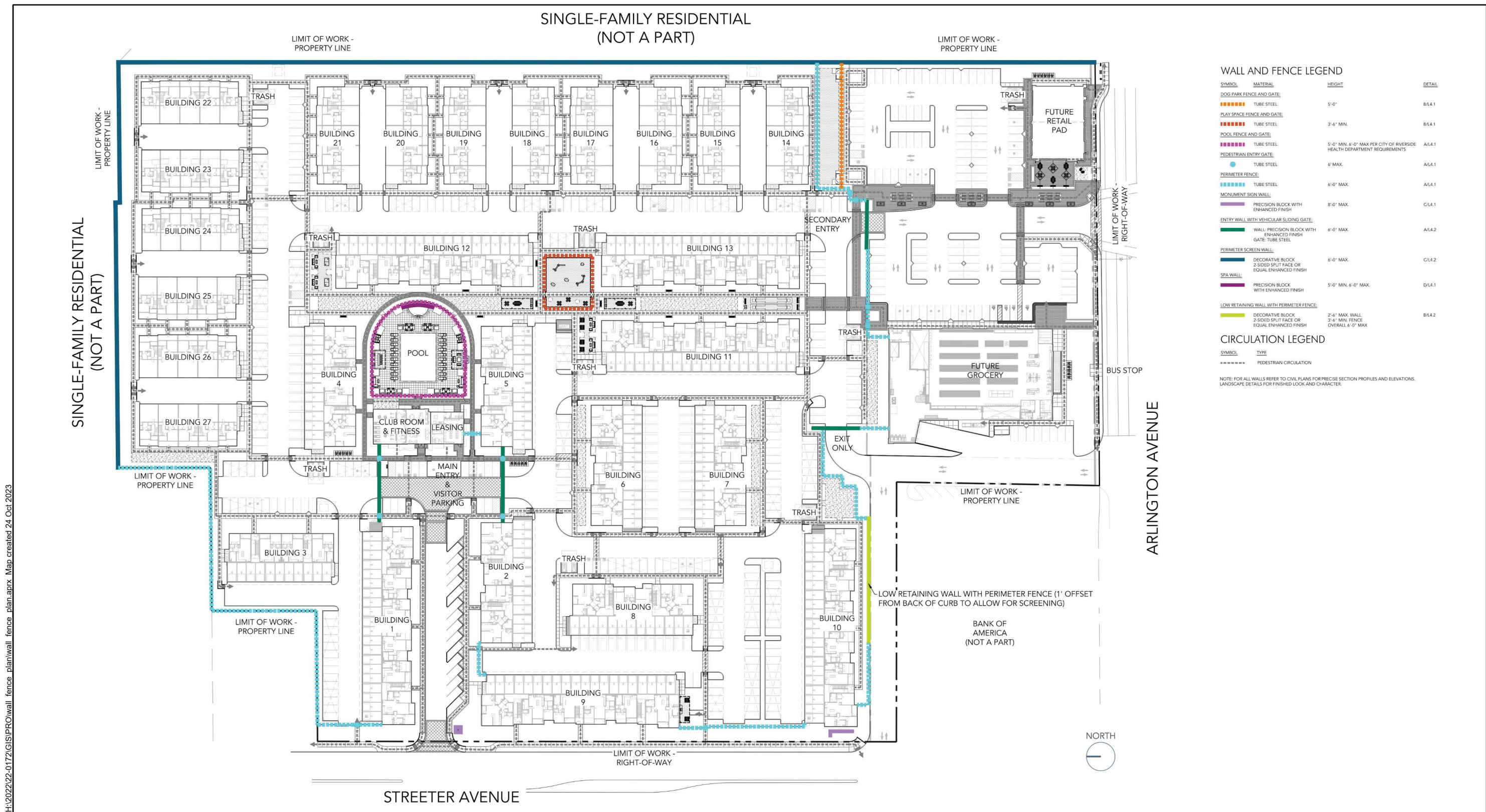
TRADESCANTIA

Source: Architects Orange Mar 29, 2023.

Figure 3.0-26 Plant Palette [2 of 2]

Arlington Mixed Use





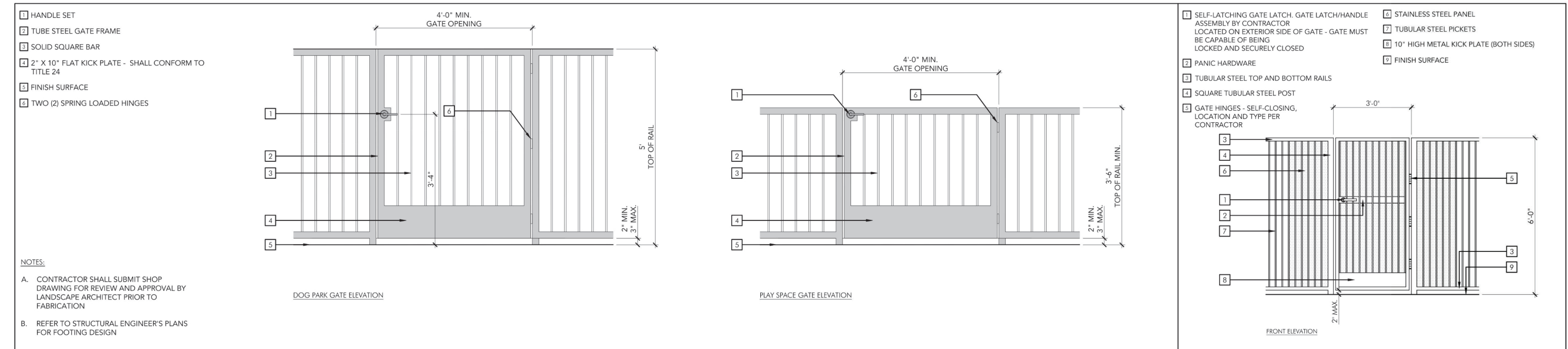
H:\2022\22-0172\GIS\PRO\wall fence plan.aprx Map created 24 Oct 2023

Source: Architects Orange July 24, 2023.

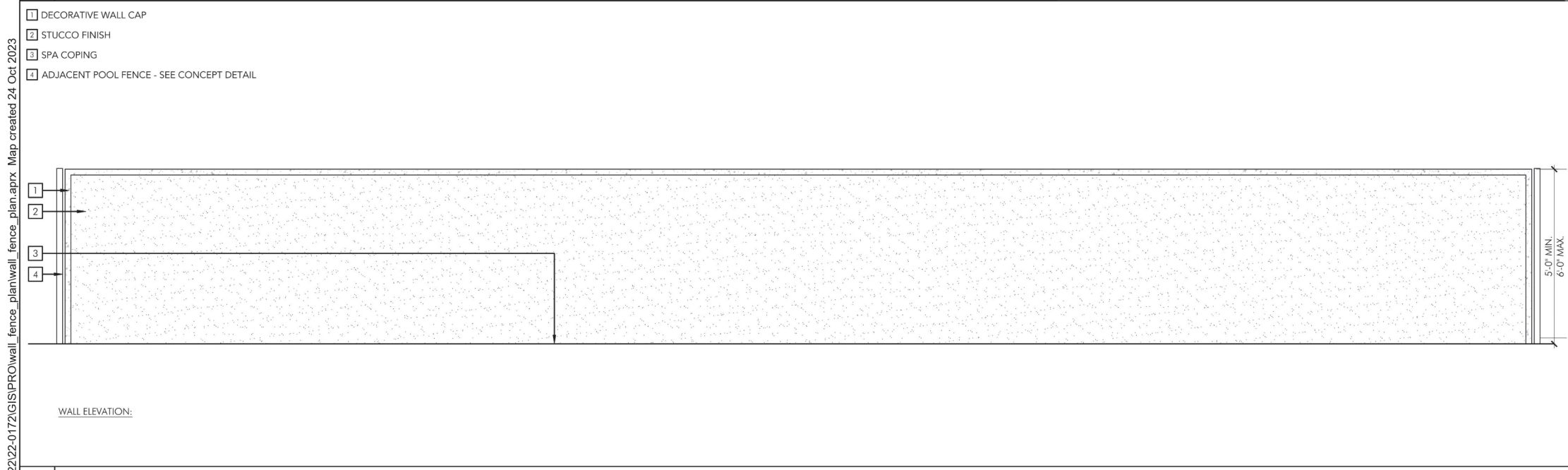
**Figure 3.0-27 Wall and Fence Plan**  
Arlington Mixed Use

NTS

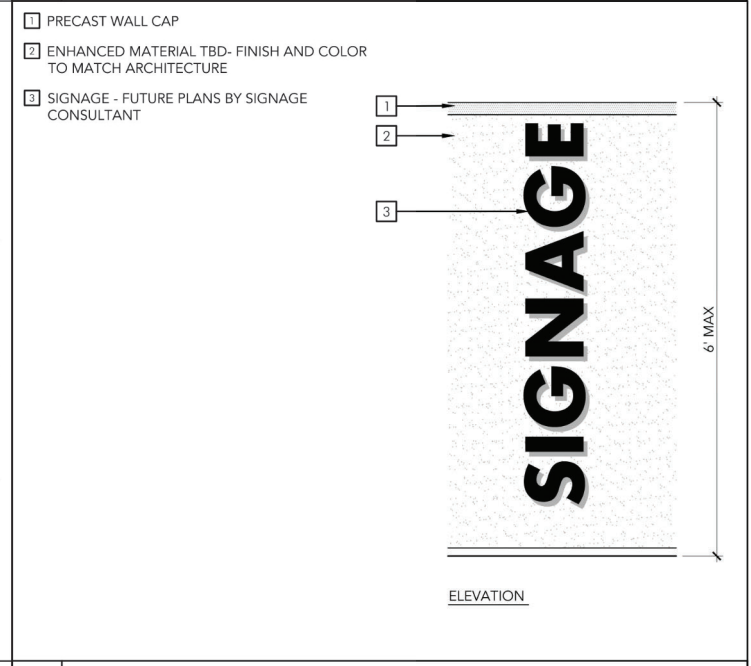




**B DOG PARK & PLAY SPACE VINYL COATED FENCE & GATE** 3/4" = 1'-0"



**A TUBE STEEL FENCE AND GATE** 1/2" = 1'-0"



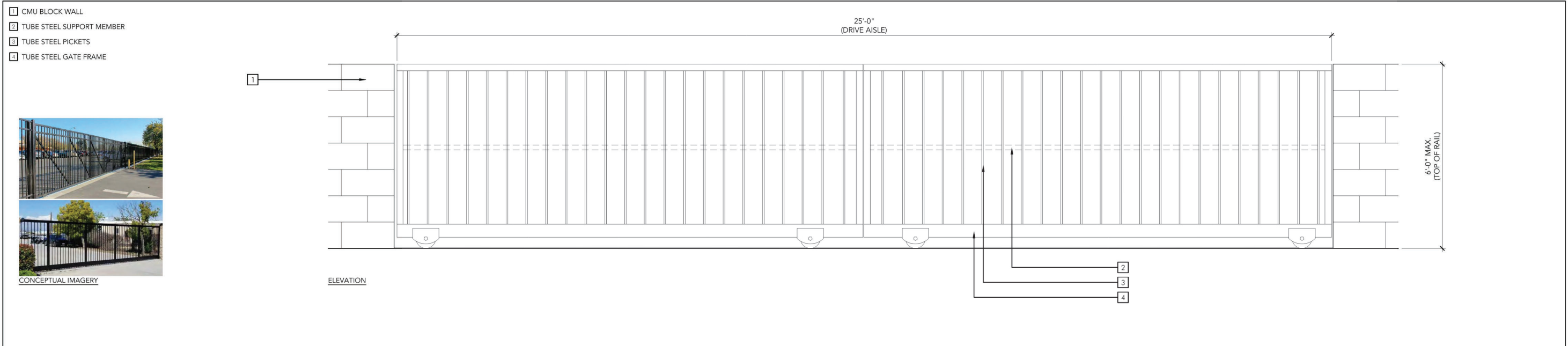
**D SPA FOUNTAIN WALL** 1/2" = 1'-0"

**C MONUMENT SIGN WALL** 3/4" = 1'-0"

Source: Architects Orange July 24, 2023.

**Figure 3.0-28 Wall and Fence Details [1 of 2]**  
Arlington Mixed Use

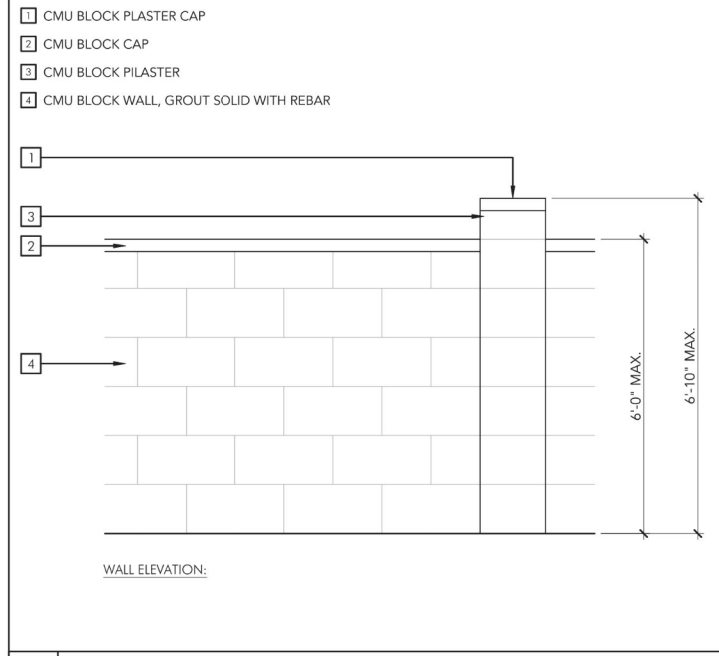
H:\2022\22-0172\GIS\PRO\wall\_fence\_plan.aprx Map created 24 Oct 2023



**A ENTRY WALL AND VEHICULAR GATE**

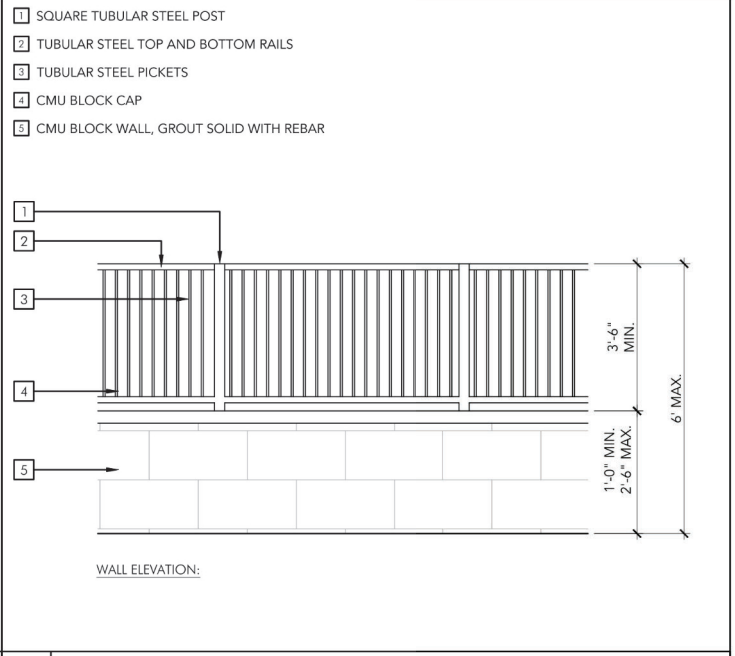
F-20-121-01-04

3/4" = 1'-0"



**C BLOCK WALL**

F-20-121-01-05  
 1/2" = 1'-0"



**B BLOCK WALL & PERIMETER FENCE**

F-20-121-01-01  
 1/2" = 1'-0"

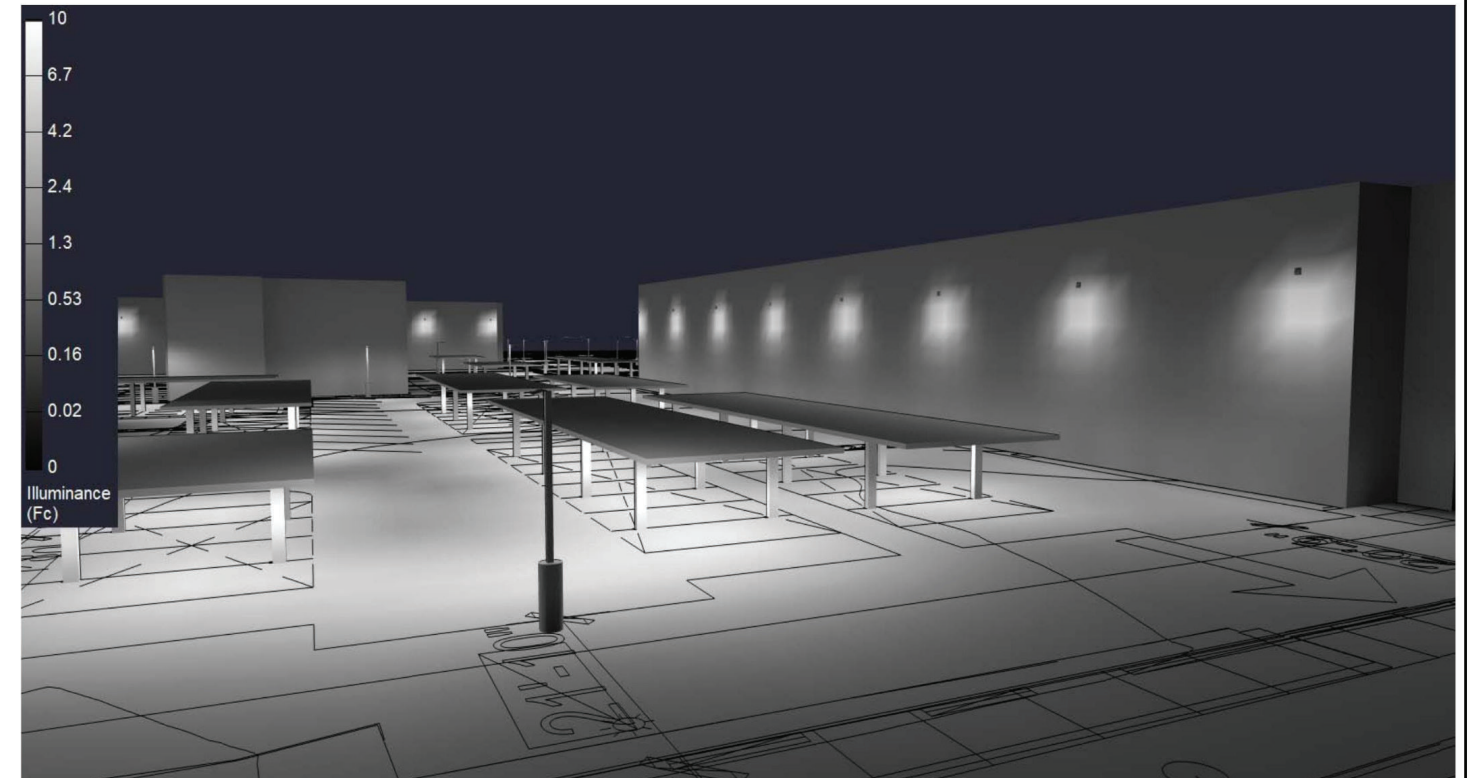
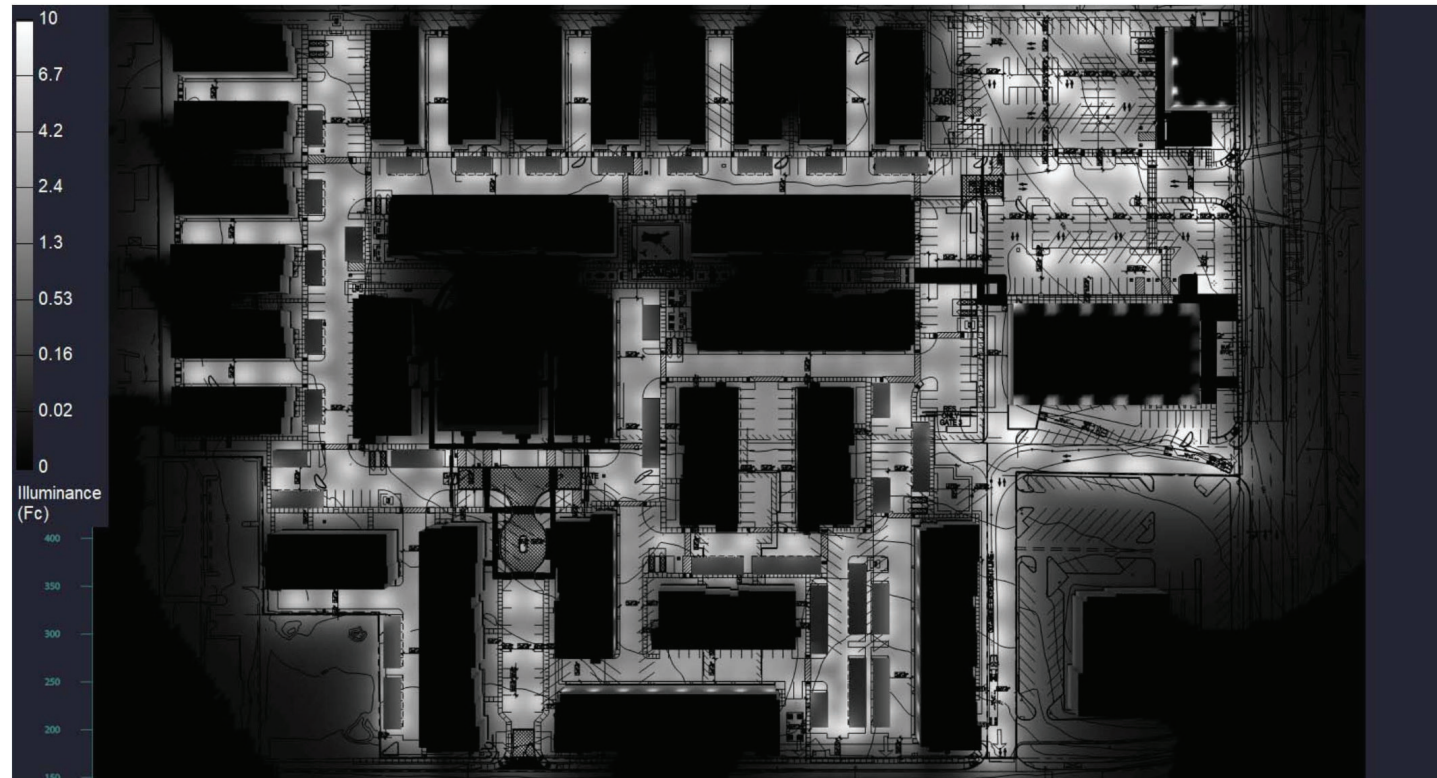
Source: Architects Orange July 24, 2023.

**Figure 3.0-29 Wall and Fence Details [2 of 2]**  
 Arlington Mixed Use





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Top View : Grayscale Rendering

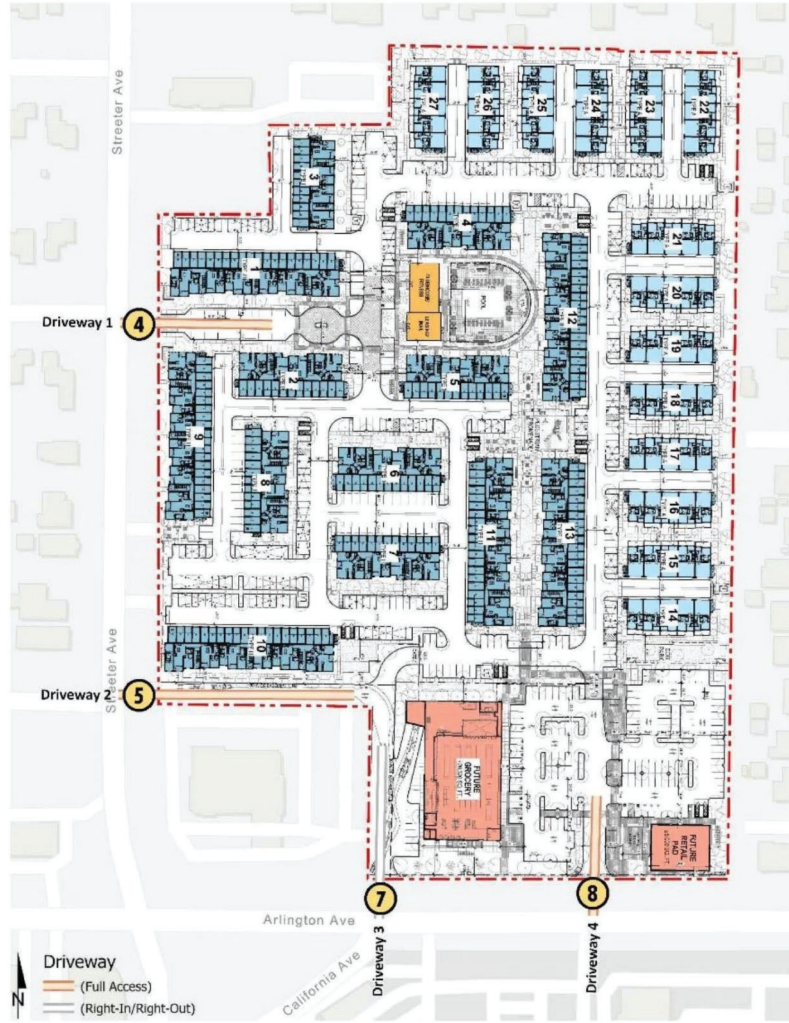
Canopy Isometric View : Grayscale Rendering

Source: RAB Riverside Development, Nov 8, 2022.

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**Figure 3.0-30 Proposed Lighting Plan**  
Arlington Mixed Use

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4	Streeter Av. & Granada Av.	5	Streeter Av. & El Molino Av.	7	California Av. & Arlington Av.	8	Driveway & Arlington Av.
= Traffic Signal							
= Stop Sign Improvement							
= Existing Stop Sign							
= Existing Lane							
= Lane Improvement							

-  = Traffic Signal
-  = Stop Sign Improvement
-  = Existing Stop Sign
-  = Existing Lane
-  = Lane Improvement

Source: Arlington Mixed Use Traffic Analysis, Oct. 18, 2023.

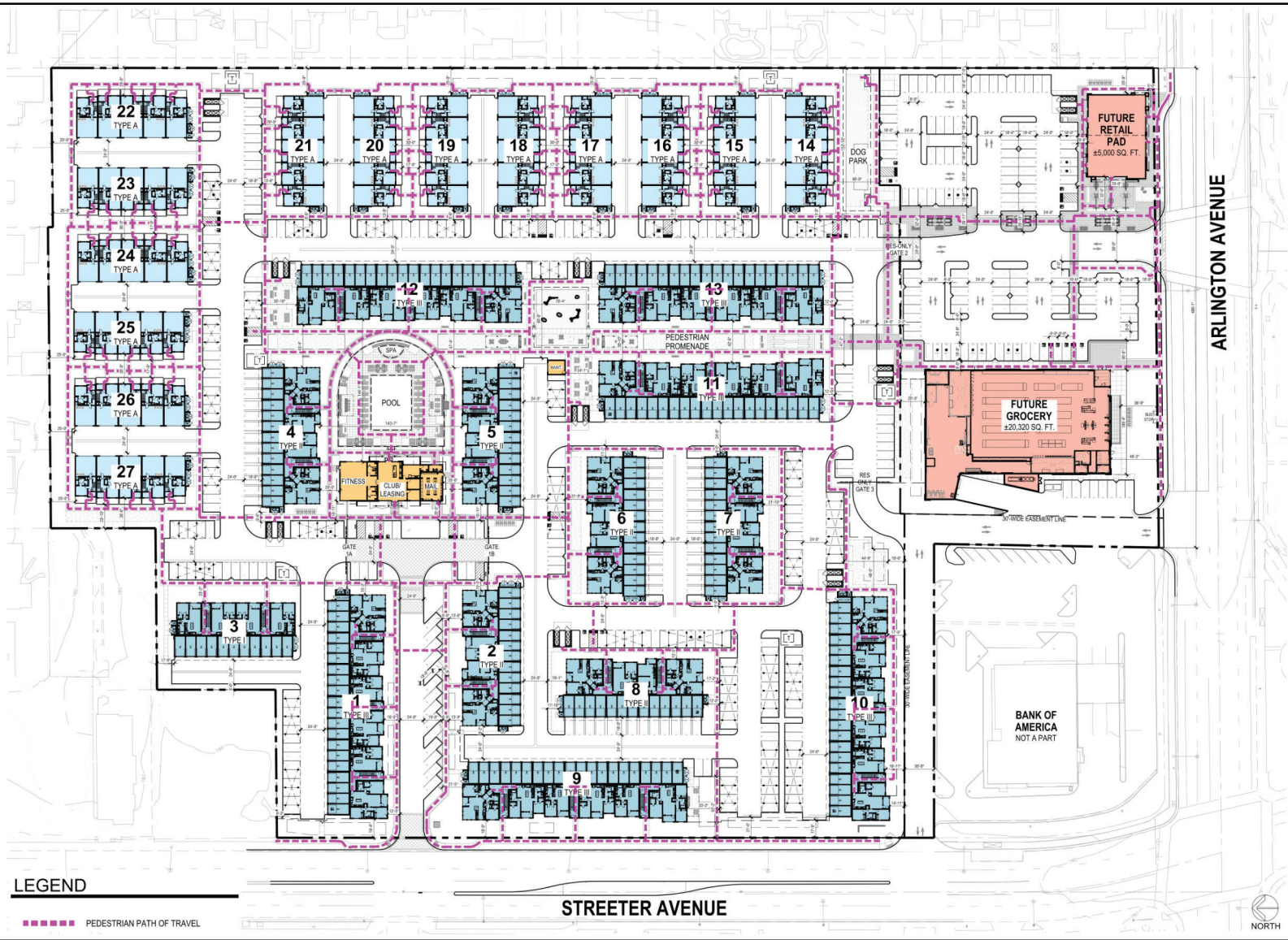
## Figure 3.0-31 Proposed Transportation Improvements

Arlington Mixed Use

NTS



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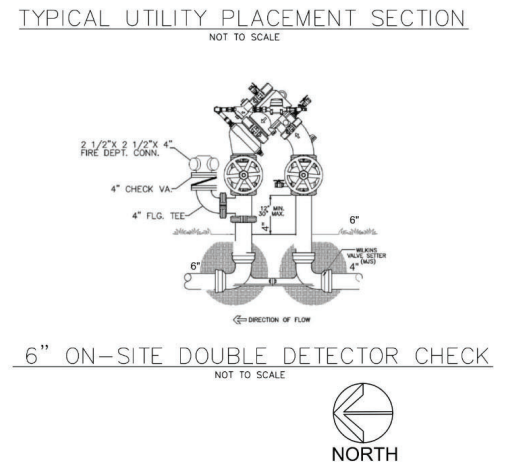
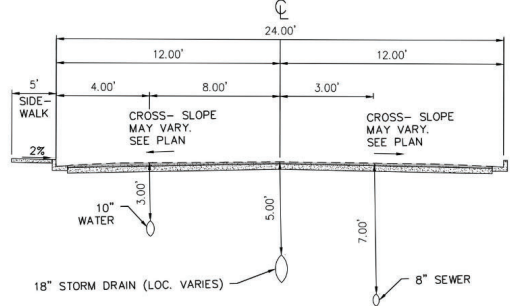
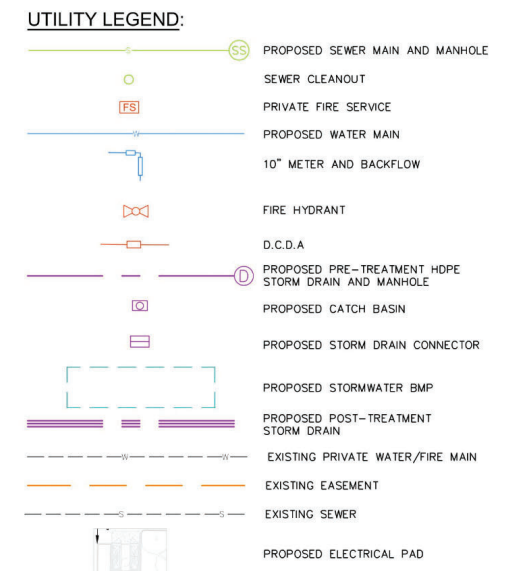
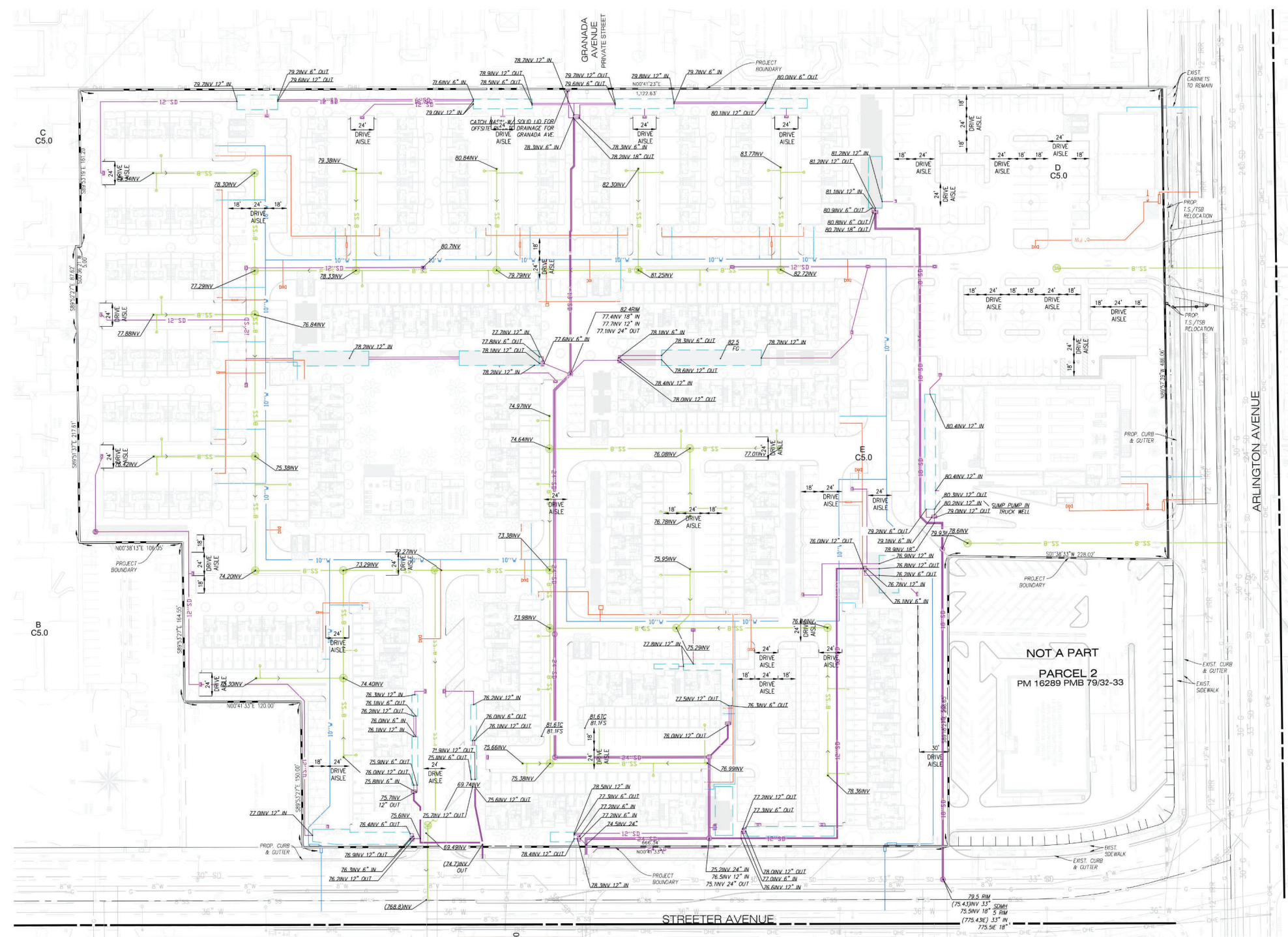
Source: Architects Orange June 15, 2023.

**Figure 3.0-32 Pedestrian Circulation**  
Arlington Mixed Use

NTS



H:\2022\02-0172\GIS\PRO\utility\_plan.aprx Map created 27 Jun 2023



- NOTES:**
1. ONSITE SEWER MAINS TO BE INSTALLED PER PUBLIC WORKS STANDARDS. LATERALS AND BUILDING CONNECTIONS PER CURRENT CPC.
  2. ONSITE PRIVATE FIRE SYSTEM AND HYDRANT LOCATIONS PER CITY FIRE DEPARTMENT.
  3. ONSITE PRIVATE DOMESTIC WATER PER CITY WATER DEPARTMENT.
  4. DOMESTIC WATER LATERALS FROM ONSITE PRIVATE WATER MAINS TO BUILDINGS PER CURRENT CPC WITH SUBMETERING AS REQUIRED.

Source: Architects Orange Aug 5, 2022.

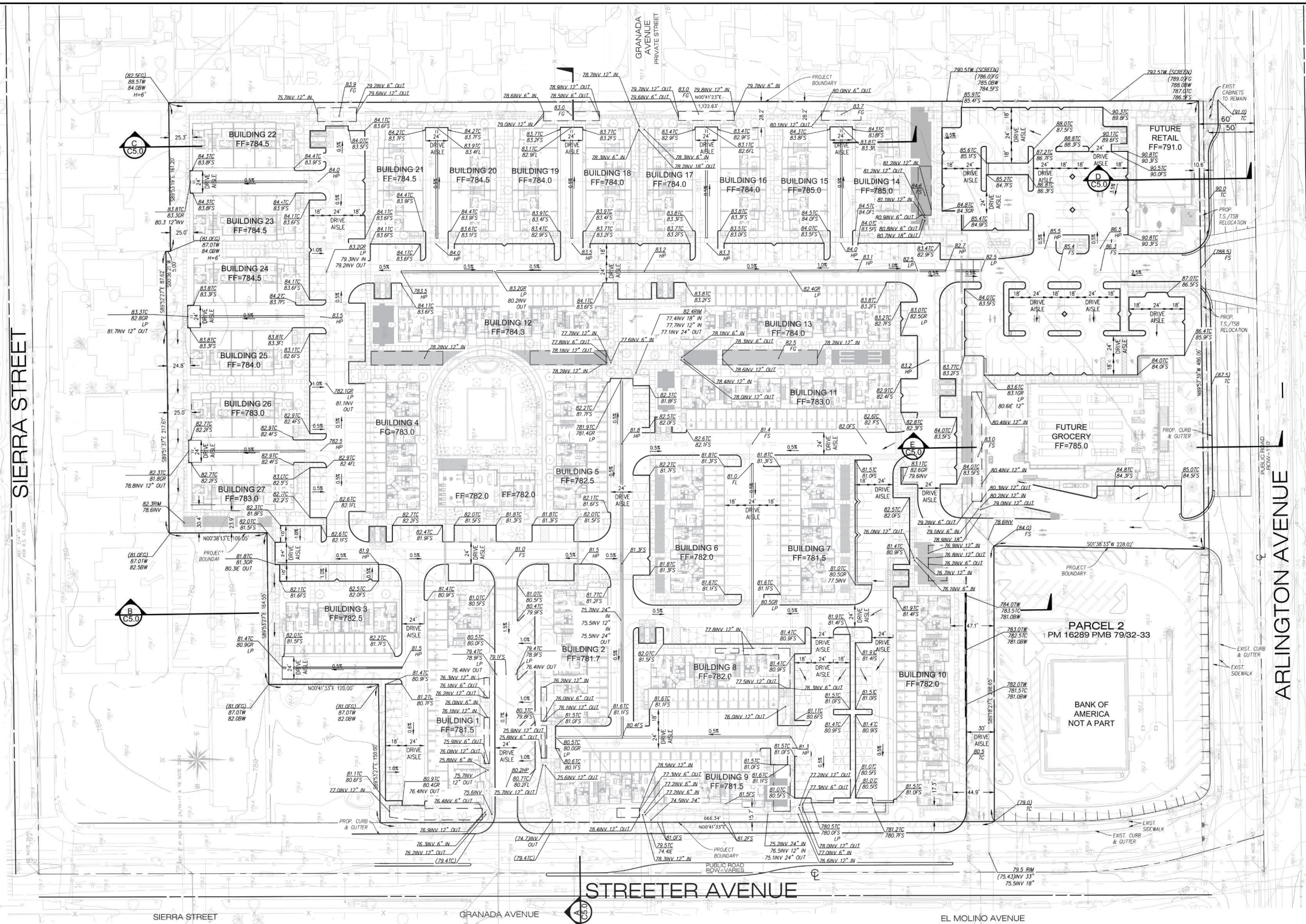
Figure 3.0-33 Existing and Proposed Utility Plan Arlington Mixed Use

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H:\2022\22-0172\GIS\PRO\grading\_drainage.aprx Map created 27 Jun 2023



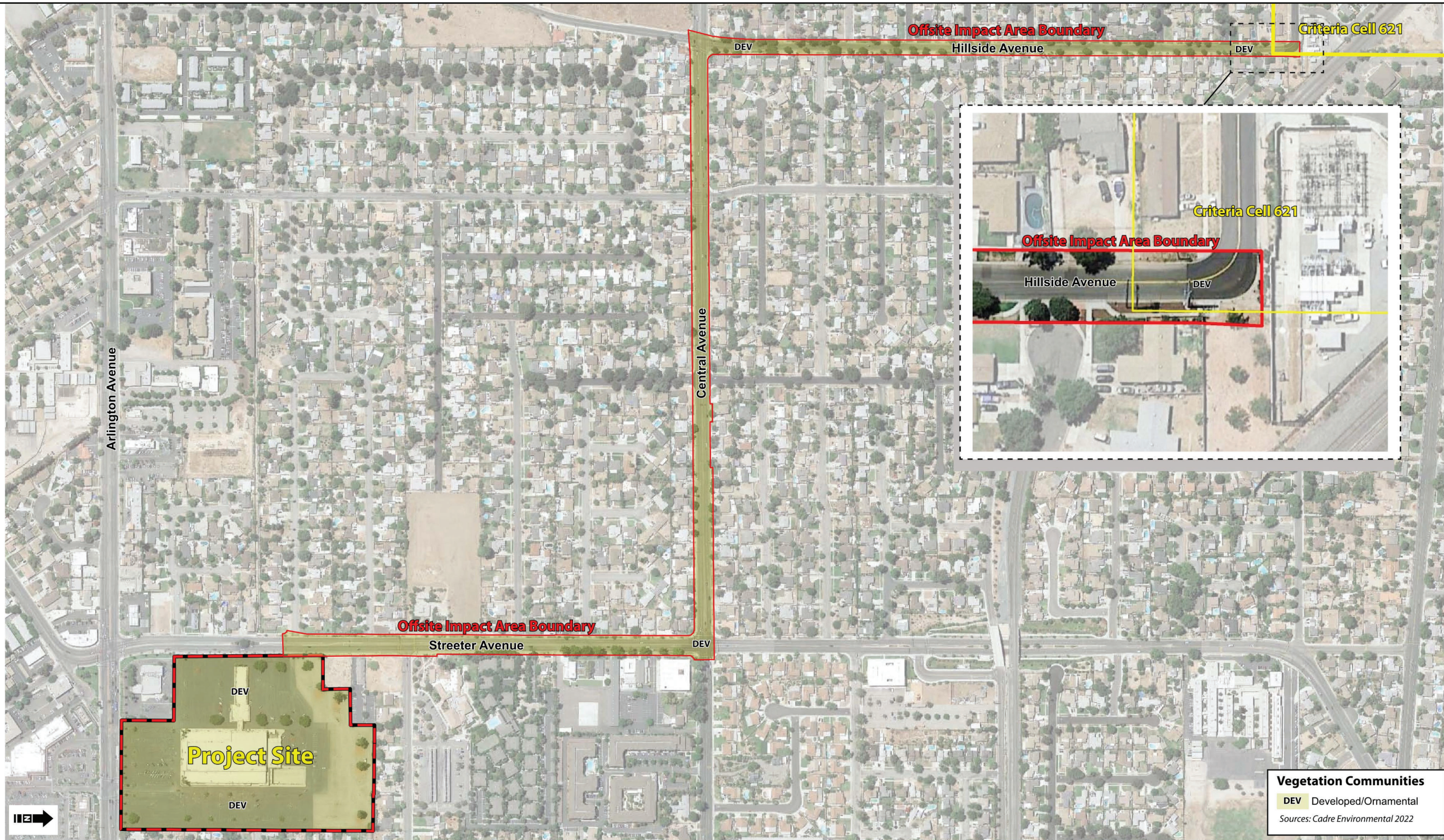
Source: Architects Orange Aug 5, 2022.

Figure 3.0-34 Proposed Drainage and Grading Plan  
Arlington Mixed Use

NTS



H:\2022\02-0172\GIS\PRO\off-site bio\_resources.aprx Map created 05 Jul 2023



APN 226-180-015 and Right-of-Way

Project Site (Permanent Impact Area)
  Offsite (Temporary Impact Area)

**Vegetation Communities**

DEV Developed/Ornamental

Sources: Cadre Environmental 2022

Source: CADRE Environmental May, 2023.

**Figure 3.0-35 Offsite Biological Resources**  
Arlington Mixed Use

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## 4.0 Environmental Effects Found Not to be Significant

CEQA provides that a Draft EIR shall focus on all potentially significant effects created by the Project on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an Initial Study/Notice of Preparation (IS/NOP) as insignificant and unlikely to occur need not be discussed further in the Draft EIR unless information inconsistent with the finding in the Initial Study is subsequently received. The full Initial Study for this Project is found in Appendix A.

### 4.1 Effects Found Not to be Significant During Preparation of the Initial Study/Notice of Preparation

Section 21100(c) of the Public Resources Code states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a Project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 of the State *CEQA Guidelines* adds, “Such a statement may be contained in an attached copy of an Initial Study.”

The Initial Study prepared for the Arlington Mixed Use Development Project (Project), (Appendix A) concluded that the proposed Project would not result in significant impacts or impacts would be less than significant with the incorporation of standard mitigation measures identified in the Initial Study, as necessary, to the following issue areas or thresholds within those issue areas as discussed below. The specific issues listed are not discussed further within the body of the Draft EIR. The following is a summary of the discussions from the Initial Study.

#### 4.1.1 Aesthetics

##### **Threshold: Adverse Effect on a Scenic Vista**

Scenic vistas are the view of an area that is visually or aesthetically pleasing. Development projects may potentially impact scenic vistas in two ways: 1) directly diminishing the scenic quality of the vista, or 2) by blocking the view corridors or “vistas” of scenic resources. The proposed Project site is not a scenic resource. Vista points can be found throughout the City both from urban areas toward the hills and from wilderness areas looking on to Riverside. Long-distance views of natural terrain and vegetation can be found throughout the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Park. Like most of the development in the City, the proposed Project will be developed within the valley floor. As such, the Project site is not part of the City’s view corridors. Thus, the implementation of the Project would not have a substantial adverse effect on a scenic vista. Therefore, impacts would be less than significant. (IS, p. 51).

##### **Threshold: Damage Scenic Resources**

The Project site does not contain any rock outcroppings and will remove the existing non-native tree species. The Project will be required to incorporate a landscape plant palette consistent with Riverside Citywide Design Guidelines for Water Efficient Landscape and Irrigation Design Guidelines, amended January 2019 (RCDG) as well as plants consistent with the Riverside County Airport Land Use Commissions Landscaping Near Airports: Special Considerations for Preventing or Reducing Wildlife Hazards to Aircraft. There are no state scenic highways within the City that could potentially be

impacted by the proposed Project. However, Arlington Avenue has been designated as a Scenic Boulevard and Scenic Parkway. Regardless, the Project is not located along a state scenic highway. Thus, impacts from Project implementation would not substantially damage scenic resources related to trees, rock outcroppings, or state scenic highways. (IS, pp. 51-52).

### **Threshold: Create a New Source of Substantial Light or Glare**

The Project site is an existing vacant development, and as such, existing streetlights are located along Streeter Avenue and Arlington Avenue within the roadway right-of-way. The proposed Project would add additional exterior building lights and exterior lighting for safety and security purposes within parking lots, along pathways, and on buildings. All light sources would be shielded so that the light is directed downward and away from streets and adjoining properties. Further, all light fixtures would be required to be consistent with the Riverside Municipal Code (MC) Title 19 - Zoning Code for illumination. Although the Project would add new sources of potential light and glare (i.e. new lights and windows), the Project would not adversely affect day or nighttime views because the existing Project site and surrounding areas are fully developed and urbanized with existing lighting. Thus, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant. (IS, p. 52).

## **4.1.2 Agriculture and Forest Resources**

### **Threshold: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to Non-Agricultural Use**

The Project is located within an urbanized area. The Project site was previously used for the Sears department store so the site is an existing vacant developed lot with buildings, parking lots, and pavement. The area surrounding the Project site is also fully developed with a variety of urban land uses such as commercial, office, public facilities, single-family residential, medium-high density residential and high density residential. Additionally, as shown in the City's 2025 General Plan, Figure OS-2 Agricultural Suitability map, the Project site is located in an area designated as Urban and Built-Up Land. According to the California Department of Conservation (CDC) California Important Farmland Finder Map, the Project site does not support Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, since the surrounding areas do not support farmland, implementation of the proposed Project would not affect off-site farmland. Thus, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. (IS, p. 53).

### **Threshold: Conflict with Existing Zoning for Agricultural Use or a Williams Act Contract**

The site is currently zoned CG - Commercial General. The Project proposes to rezone the site to MU-V - Mixed Use-Village. The Project site is an existing vacant development and does not support farmland or agriculture uses. The Project site is not located in an area designated as a Williamson Act Preserve or Contracted Land. Thus, the Project would not create a conflict with existing agricultural zoning for agricultural use or a Williamson Act contract. (IS, p. 53).

### **Threshold: Conflict with Existing Zoning or Cause Rezoning of Forest Land, Timberland, or Timberland Zoned for Timberland Production**

Forest land is defined as land supporting at least 10 percent native tree cover of any species, including hardwoods, under natural conditions that allow for management of one or more forest resource,



including timber. There are no areas within City limits that are designated for forestland or timberland and the City of Riverside has no forestland that can support 10 percent native tree cover nor any timberland. Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. (IS, p. 54).

**Threshold: Result in Loss of Forest Land or Conversion of Forest Land to Non-forest Use**

There is no designated forestland on or adjacent to the Project site or within the City. Thus, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. (IS, p. 54).

**Threshold: Involve Other Changes in Existing Environment Resulting in Conversion of Farmland to Non-agricultural use or Conversion of Forest Land to Non-Forest use**

The Project site and surrounding area are not located within an agricultural use area and do not support designated farmland or forestland. Thus, the Project would not result in changes in the existing environment that could result in conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. (IS, p. 54).

**4.1.3 Air Quality**

**Threshold: Result in Other Emissions (Such as Those Leading to Odor) Adversely Affecting Substantial Number of People**

The California Air Resources Board developed an Air Quality and Land Use Handbook to outline common sources of odor complaints. The sources of odors include sewage treatment plants, landfills, recycling facilities, and petroleum refineries. (CARB-B). Odor impacts during Project operation will be minimal because the land uses proposed on the Project site are not included on CARB's list of facilities that are known to be prone to generate odors. Potential sources of operational odors generated by the Project would include disposal of miscellaneous refuse. Consistent with City requirements, all Project generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site. Moreover, construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Thus, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. (IS, p. 56).

**4.1.4 Biological Resources**

**Threshold: Have a Substantial Adverse Effect on Any Species Identified as a Candidate, Sensitive, or Special Status Species**

The Project Site is within an urbanized area that is surrounded by existing development. Within the offsite area of impact for improvements, a 0.15-acre portion is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Criteria Cell number 621, Subunit 1 – Santa Ana River South. However, the 0.15-acre portion of this offsite impact area which extends into the southeastern region of MSHCP Criteria Cell 621 is characterized as a paved portion of the Hillside Avenue right-of-way and the area is completely surrounded by existing residential development and

power grid facility. Further, this area is not located within the northeastern region of Criteria Cell 621 where conservation is identified. The 0.15-acre of developed land will be temporarily impacted as a result of infrastructure improvements proposed within the offsite impact area right-of-way extending into Criteria Cell 621, but the proposed impacts within this offsite area would not conflict with the reserve design goals, Existing Core A or the Santa Ana River. Nonetheless, the Project went through a Joint Project Review (JPR) by the Western Riverside County Regional Conservation Authority (RCA) and a determination indicating the Project is consistent with the MSCHP was made in June 2023.

No other portion of the Project site is located within a MSHCP criteria cell, narrow endemic plant species area, criteria area, or sensitive plant species survey area. Furthermore, no state or federally listed threatened or endangered plant species were detected or are expected to occur onsite. Additionally, no other California Native Plant Society (CNPS), special-status plants, or species of local concern were observed onsite. There were no sensitive vegetation communities listed by the California Department of Fish and Game (CDFG) documented within or adjacent to the Project site. Further, the Project site does not occur within a predetermined MSHCP Survey Area for the burrowing owl, amphibians, or mammals and no state or federally listed threatened or endangered wildlife species were detected or are expected to occur onsite. Additionally, no other special status wildlife species, or species of local concern were observed or expected to occur onsite. No natural habitats are located on site. Implementation of Mitigation Measure MM BIO-1 will ensure that no nesting birds, regardless of their listing status, will be impacted through compliance with CDFG Code Section 3503 and the Migratory Bird Treaty Act.

**MM BIO-1: Nesting Birds.** Prior to issuance of grading, should tree and/or vegetation removals be required during the nesting/breeding season (between February 1st and August 31st.), a pre-removal nesting bird survey shall be required. If construction is proposed a qualified biologist shall conduct a nesting bird survey(s) no more than three (3) days prior to initiation of grading to document the presence or absence of nesting birds within or directly adjacent (100 feet) to the Project Site. The survey(s) shall focus on identifying any raptors and/or bird nests that are directly or indirectly affected by construction activities. If active nests are documented, species specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. At a minimum, grading in the vicinity of a nest shall be postponed until the young birds have fledged. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted to the City of Riverside for review and approval prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. A final monitoring report of the findings, prepared by a qualified biologist, shall be submitted to the City of Riverside documenting compliance with the CDFG Code. Any nest permanently vacated for the season shall not warrant protection pursuant to the CDFG Code.

Thus, with implementation of MM BIO-1, the Project would not result in substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, impacts would be less than significant with mitigation incorporated. (IS, pp. 56-58).



**Threshold: Have a Substantial Adverse Effect on Any Riparian Habitat or Other Sensitive Natural Community**

The Project site is an existing developed site located in an urbanized area that does not contain riparian habitat or other sensitive natural communities. Thus, the proposed Project would not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS). (IS, pp. 58-59).

**Threshold: Have a Substantial Effect on State or Federally Protected Wetlands**

There are no federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) on-site or within proximity to the Project site. Further, the Project site does not contain any wetlands or jurisdictional resources regulated by the US Army Corps of Engineers (USACE), CDFW or Regional Water Quality Control Board (RWQCB). Thus, the proposed 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. (IS, p. 59).

**Threshold: Interfere Substantially with Movement of any Native Resident or Migratory Fish or Wildlife Corridor or Impede the use of Native Wildlife Nursery Sites**

The Project site does not represent a regional wildlife movement corridor and provides no cover, food, and no natural unrestricted water courses that would facilitate regional wildlife movement onsite and is not located in a Multiple Species Habitat Conservation Plan (MSHCP) designated core, extension of existing core, non-contiguous habitat block, constrained linkage or linkage area intended to protect lands for wildlife movement. The Project site is completely surrounded by high density residential/ mixed use retail development and high traffic roads. Thus, the proposed 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. (IS, p. 59).

**Threshold: Conflict with Local Policies or Ordinances Protecting Biological Resources, such as a Tree Preservation Policy or Ordinance**

The General Plan 2025 includes policies to ensure that future development would not conflict with any local policies or ordinances protecting biological resources. Objectives and policies that relate to biological resources include the following:

Objective OS-5: Protect biotic communities and critical habitats for endangered species throughout the General Plan Area.

- Policy OS-5.2: Continue to participate in the MSHCP Program and ensure all projects comply with applicable requirements.
- Policy OS-5.3: Continue to participate in the Stephens' Kangaroo Rat (SKR) Habitat Conservation Plan including collection of mitigation fees.

The Project applicant shall be required to pay the SKR fees in accordance with County of Riverside Ordinance 663.10 and City of Riverside MSHCP Local Development Mitigation Fees (LDMF), established by MC Section 16.72.040. Further, the Project site is an existing development and does not contain any biological resources. Through payment of applicable fees, the Project will not conflict with any of the 2025 General Plan policies listed above. The City's Municipal Code Section 13.25.020 establishes guidelines for removal, trimming and trenching around trees in City rights-of-way. (MC.) The project does not propose to remove or plant any trees within the City's rights-of-way. Thus, implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources. (IS, pp 59-60).

**Threshold: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan**

The Initial Study found that the Project Site falls within the boundaries of two Habitat Conservation Plans (HCPs): the Western Riverside Multiple Species Habitat Conversation Plan (MSHCP) and the Stephens Kangaroo Rat (SKR) HCP. Because a small portion of the offsite footprint associated with the electrical conduit extension is located within Criteria Cell 621, the Project went through a Joint Project Review (JPR) by the Regional Conservation Authority (RCA) and determination indicating the Project is consistent with the MSCHP was made in June 2023.

Since the area of the offsite electrical conduit extension is located completely under an existing street, this area does not support riparian, riverine, fairy shrimp and vernal pool habitats and no species associated with these habitat types are present on the site. Therefore, since no MSHCP resources were identified within the area of Cell 621, nor on any other part of the Project, a MSHCP Determination of Biologically Equivalent or Superior Preservation (DBESP) report is not warranted.

The Project will pay the SKR preservation fee at the time of grading permits. Thus, the Initial Study determined that with implementation of mitigation measure MM BIO-1, the proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, impacts are less than significant with mitigation incorporated. (IS, pp. 60-62).

#### **4.1.5 Cultural Resources**

**Threshold: Disturb any Human Remains, Including Those Interred Outside of Formal Cemeteries**

The Initial Study determined there to be no known cemeteries located on the Project site or along the off-sites. Therefore, the Project would comply with regulatory requirements for the treatment of Native American human remains pursuant to California Health and Safety Code regulations Sections 57051 and 7054, and California Public Resources Code Section 5097.98, These regulations would require all work to halt if human remains are found and would require archaeologist and city to be contained to provide protection measures. Implementation of mitigation measures MM CR-1 will further ensure impacts to human remain are less than significant.

**MM CR-1:** Human Remains. If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If



the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the “most likely descendant”. The “most likely descendant” shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98).

Through compliance with existing regulations and implementation of mitigation measure CR-1, impacts with regard to disturbing human remains, including those interred outside of dedicated cemeteries will be less than significant. Therefore, this impact will not be analyzed in the EIR. Therefore, impacts are less than significant with mitigation incorporated. (IS, p. 63).

#### **4.1.6 Geology and Soils**

##### **Threshold: Direct or Indirect Effect Involving Rupture of a Known Earthquake Fault**

There are no Alquist-Priolo zones in the City. Several large active fault systems, occur in the region surrounding the Project site such as; Whitter-Elsinore, San Jacinto, and the San Andreas. However, the Project site is located approximately 11.9 miles east of the Whitter-Elsinore Fault zone, 10.9 miles west of San Jacinto Fault zone, and 17.5 miles west of San Andres Fault zone so the potential for fault rupture or seismic shaking is very low. Additionally, the Project would be required to comply with all California Building Code (CBC) regulations. Thus, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of known earthquake fault. Therefore, impacts are less than significant less than significant impacts. (IS, pp. 64-65).

##### **Threshold: Direct or Indirect Effect Involving Ground Shaking Zone**

The Project site is located on the northern portion of the Riverside sub-block. Due to the Project site being approximately 10 to 17 miles away from fault zones, as mentioned above, ground shaking hazards caused by earthquakes can occur that have the potential to cause moderate to intense ground shaking. However, the proposed Project would be required to comply with CBC regulations. Thus, 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. Therefore, impacts are less than significant. (IS, p. 65).

##### **Threshold: Direct or Indirect Effect Involving Ground Failure/Liquefaction**

According to the Initial Study the Project Site is located in an urbanized area and the general topography of the Project Site is flat. The Initial Study found that the Project’s potential of liquefaction to be low. Conformance with the CBC and recommendations outlined in the Geotechnical Investigation, the Project is not anticipated to cause potential substantial adverse effects directly or indirectly, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Therefore, impacts are less than significant. (IS, p. 65).

##### **Threshold: Direct or Indirect Effect Involving Landslide Risk**

The Project site is located in an urbanized area with generally flat topography and is not located in an area prone to landslides. Because the site is relatively flat and not close to significant slopes, the potential for earthquake-induced landslides to occur at the site is considered very low. Thus, the Project

is not anticipated to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including landslides. Therefore, no impacts are anticipated. (IS, p. 66)

**Threshold: Result in Substantial Soil Erosion or the Loss of Topsoil**

The Project site is flat but erosion and loss of topsoil could occur as a result of Project construction. However, the Project will be required to comply with the State and federal requirements regarding the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The Project is also required to comply with the National Pollutant Discharge Elimination System (NPDES) regulations. Additionally, with the erosion control standards for which all development activity must comply (Title 18), the Grading Code (Title 17) requires the implementation of measures designed to minimize soil erosion (MC). Thus, through compliance with state and federal requirements as well as with Titles 18 and 17 the Project would not result in substantial soil erosion or loss of topsoil. Therefore, impacts would be less than significant. (IS, p. 65).

**Threshold: On- or Off-site Landslide/ Lateral Spreading/Subsidence/Liquefaction or Collapse**

According to the Initial Study the Project Site is located in an urbanized area and the general topography of the Project Site is flat. The Project Site is not located in an area prone to landslides. Properties involved in the proposed improvements and adjacent properties are generally flat and have a low potential for landslides to occur. The Initial Study found that the Project's potential of liquefaction-induced lateral spread is considered remote because the site has low liquefaction potential. Therefore, lateral spreading is not anticipated. Thus, the Project is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant. (IS, pp. 66-67).

**Threshold: Expansive Soils**

A majority of the Project site is classified as low to medium in expansion potential. Since soils have some expansive potential, all design and construction shall comply with the recommendations outlined in the Geotechnical Investigation. Thus, through compliance with the recommendations of the Geotechnical Investigation report, applicable provisions of the City's Subdivision Code Title 18, and the CBC with regard to expansive soils, the Project would not create substantial direct or indirect risks to life or property. Therefore, impacts would be less than significant. (IS, p. 67).

**Threshold: Septic Tanks**

The Project site is an existing development located within an urbanized area. The Project will connect to and be served by existing sewer infrastructure. The Project does not propose the use of a septic system. Thus, 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 is not applicable to the proposed Project. Therefore, no impacts are anticipated. (IS, p. 67).



### **Threshold: Unique Paleontological Resource Or Site Or Unique Geologic Feature**

The Initial Study determined that portions of the Project site and surrounding area are considered to have a high paleontological sensitivity. With Implementation of mitigation measure MM GEO-1 below will reduce potential Project-related impacts to unique paleontological resources and/or sites.

**MM GEO-1:** Paleontological Resources Impact Mitigation Program and Paleontological Monitoring. Prior to issuance of grading permit, the Project proponent shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The qualified paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project that shall be consistent with the SVP (2010) guidelines and outline requirements for preconstruction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the Project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. A qualified paleontological monitor shall be on the Project site during initial rough grading and other significant ground-disturbing activities (including augering) in areas underlain by Pleistocene alluvial deposits and below a depth of five feet below the ground surface in areas underlain by Holocene alluvium to determine if they are old enough to preserve scientifically significant paleontological resources. No paleontological monitoring shall be necessary during ground disturbance within artificial fill. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor shall allow grading to recommence in the area of the find.

Thus, with implementation of mitigation measure MM GEO-1, the Project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, impacts are less than significant with mitigation incorporated. (IS, pp. 67-68).

### **4.1.7 Hazards and Hazardous Materials**

#### **Threshold: Create a Significant Hazard to the Public or Environment Through Routine Transport/Use/ Disposal of Hazardous Materials**

Based on the Initial Study the proposed Project may include routine transport, use, and disposal of hazardous materials during demolition and construction of the Project. However, construction activities would occur in accordance with all applicable local standards adopted by the City of Riverside, as well as state and federal health and safety requirements intended to minimize hazardous materials risk to the public, such as Cal/OSHA requirements, the Hazardous Waste Control Act, the California Accidental Release Protection Program, and the California Health and Safety Code. Additionally, a Hazardous Material Business Emergency Plan has already been adopted and implemented for the existing operations on-site. During operation, residential use is anticipated to have low potential for use of hazardous materials. Non-residential would be required to compliance with all applicable local, State, and federal laws. Additionally, both Federal and State governments require all businesses that handle more than a specified number of hazardous materials to submit a business plan to regulating agency.

Specifically, any new business that meets the specified criteria must submit a full hazardous materials disclosure report. Thus, because the Project would be required to comply with all applicable federal and state laws related to the transportation, use, storage and response to upsets or accidents that may involve hazardous materials, it would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant. (IS, pp. 69-70).

#### **Threshold: Vicinity of a School**

The Initial Study found there are no existing or proposed schools within one-quarter mile of the Project site. The schools nearest the site are: Jefferson Elementary located approximately 0.35 miles southwest of the Project site, Our Lady of Perpetual Help Catholic School located 0.39 miles north of the Project site, and Sierra Middle School located 0.51 miles northeast (GE). As such, there are no existing or proposed schools within one-quarter mile of the Project site., Thus, the Project site would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (IS, pp. 71-72).

#### **Threshold: Hazardous Materials Site**

The Initial Study determined Project site is not included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.25. Thus, the Project would not result in a significant hazard to the public or the environment. Therefore, impacts would be less than significant. (IS, p. 72).

#### **Threshold: Impair Implementation of or Physically Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan**

The Project may include improvements to adjacent streets that might result in temporary road closures. However, implementation of the proposed Project will not interfere with evacuation or emergency response plans as all local roadways would remain open during Project construction and operation. Construction activities occurring within the Project Site would comply with all conditions, and the City's Local Hazard Mitigation Plan Thus, implementation of the proposed Project would not impair or physically interfere with an emergency response plan or evacuation plan. (IS, pp. 72-73).

#### **Threshold: Wildland Fires**

The Project site is not identified as being in a very high fire hazard severity zone according to the Fire Hazard Severity Zones in the State Responsibility Area Map produced by the California Department of Forestry and Fire Protection. Additionally, the Project site is not located within the City's moderate, high, or very high hazard rating area. As such, the Project site will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (IS, p. 73).

### **4.1.8 Hydrology/Water Quality**

After circulation of the IS/NOP documents, the water quality basins were revised to instead provide subterranean storm drain facilities. Because the Project site's infiltration rates are so low, the Project has been authorized to utilize Modular Wetlands as a form of stormwater treatment. Storm water will be conveyed via underground pipes to Modular Wetlands located throughout the Project site. where storm water will be captured and treated in underground chambers before being conveyed to the existing storm drain facilities in Streeter Avenue. This system meets all regulatory requirements for storm water treatment and does not change any of the findings within the Initial Study document. An Updated



Preliminary Water Quality Management Plan was prepared by PSOMAS approved October 2023 (PSOMAS-C), as is included in Appendix A1 of this Draft EIR.

**Threshold: Violate Any Water Quality Standards Or Waste Discharge Requirements Or Otherwise Substantially Degrade Surface Or Ground Water Quality**

During construction, potential threats to surface and ground water quality associated with the short-term grading and construction activities include discharges of construction-related sediment and hazardous materials (e.g., fuels). During operations potential pollutants discharged to storm drains and downstream water bodies resulting from long-term occupancy and operations of the proposed project include litter, trash, and debris; oil, grease, metals, vehicle hydrocarbons; and sediments, nutrients, pesticides, and fertilizers from landscaped areas. The Project site is tributary to Santa Ana River Reach 3. The California Regional Water Quality Control Board – Santa Ana Region (RWQCB) provides regulatory oversight of water quality in the Groundwater Management Zones (GMZs). To ensure that the Project construction activities do not impair water quality of downstream receiving waters, and because the total land disturbance area is greater than 1 acre, the Applicant will obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) permit for construction activities (i.e., Construction General Permit), which requires preparation of an effective Storm Water Pollution Prevention Plan (SWPPP) or SWPPs by a certified Qualified SWPPP Practitioner (QSP) and implemented on the Project Site by a certified Qualified SWPPP Developer (QSD), with annual reporting and monitoring requirements and enforcement by the RWQCB.

During operations potential pollutants discharged to storm drains and downstream water bodies resulting from long-term occupancy and operations of the proposed project include litter, trash, and debris; oil, grease, metals, vehicle hydrocarbons; and sediments, nutrients, pesticides, and fertilizers from landscaped areas. The Project site is tributary to Santa Ana River Reach 3. The Project will include post-construction stormwater treatment where stormwater will be integrated into the site landscaping and pre-treated through biotreatment with modular wetlands. Through compliance with existing regulations that address construction and operational-phase discharges, project impacts will be less than significant. (IS, pp. 73-75).

**Threshold: Decrease Groundwater Supplies Or Interfere Substantially With Groundwater Recharge Such That The Project May Impede Sustainable Groundwater Management Of The Basin**

The Project site does not use on-site groundwater or support groundwater wells on-site. The existing Project site is developed with 99 percent impervious surfaces so provides minimal groundwater recharge. Thus, the Project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, impacts are less than significant. (IS, p. 75).

**Threshold: Result In Substantial Erosion Or Siltation On-Or-Off-Site**

Based on the Initial Study, construction activities potential for substantial erosion is minimized through the implementation of a SWPPP during construction and catch basins and biotreatment BMP's post construction. As such the proposed Project would not result in a substantial change in drainage patterns

of the Project site that would cause substantial erosion or siltation, nor substantially increase the rate or amount of surface runoff in a manner that would result in flooding. Therefore, impacts would be less than significant. (IS, p. 76).

**Threshold: Substantially Increase The Rate Or Amount Of Surface Runoff In A Manner Which Would Result In Flooding On-Or-Off-Site**

Based on the Initial Study, the proposed Project will increase the pervious areas of the site. since the site is currently 99 percent impervious. Post development runoff during the 10-year and 100-year storm events would be reduced from current conditions. Since volumes will decrease the Project will improve current flow conditions. As such the Project will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site. Thus, impacts would be less than significant. (IS, p. 76).

**Threshold: Exceed capacity of existing or planned stormwater drainage systems**

The Initial Study found that Project will result in a reduction of peak flows and volumes. As such the Project will not 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. Thus, impacts would be less than significant. (IS, pp. 76-77).

**Threshold: Impede or redirect flood flows**

The Project site is located in “Zone X” and will incorporate an internal drainage system that would still connect to existing storm drains within the Public right-of-way along Streeter and Arlington Avenue. Since the Project site is an existing vacant developed site with two structures and parking lot, the Initial Study found that implementation of the Project would not introduce additional impervious area. Thus, the Project is not expected to impede or redirect flood flows as a result of such actions. Therefore, impacts would be less than significant. (IS, p. 77).

**Threshold: In Flood Hazard, Tsunami, Or Seiche Zones, Risk Release Of Pollutants Due To Project Inundation**

Initial Study found that the Project is not in a flood hazard zone, seiche zone, or tsunami zone. Therefore, impacts would be less than significant. (IS, pp. 77-78).

**Threshold: Conflict With Or Obstruct Implementation Of A Water Quality Control Plan Or Sustainable Groundwater Management Plan**

The Initial Study found that the local water quality control plan (Basin Plan) outlines the regulatory programs of the Regional Water Quality Control Board (RWQCB), which address ground and surface water quality. The RWQCB requires NPDES permits, construction general permits, storm sewer system permit for post construction BMPs. The Project applicant would be required to prepare and implement a SWPPP during construction and provide the required post-construction storm water quality treatment, leading to no conflicts or obstructions with the Basin Plan. Thus, the Project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant. (IS, p. 78).

#### **4.1.9 Land Use Planning**

##### **Threshold: Physically Divide an Established Community**

The Project site is surrounded by office and commercial uses to the north; medium-density residential and office uses to the east; commercial and high-density residential uses to the south; and medium-density residential, office, and commercial uses to the west. Further, the Project does not propose any new roadways that could physically divide the existing community. Thus, the Project would not divide an established community. (IS, p. 79).

#### **4.1.10 Mineral Resources**

##### **Threshold: Loss of a Known Mineral Resource Valuable to the Region and the Residents of the State**

According to the Initial Study, the Project site is not located in, nor is it adjacent to, a locally important mineral resource recovery site so is not anticipated to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. (IS, p.79).

##### **Loss of Locally Important Mineral Resource Delineated on a local General Plan, Specific Plan, or other Land Use Plan**

The Project site is located in an area with no known mineral resources of local or state importance. Therefore, the Project would not result in the loss of available resources. (IS, p. 79).

#### **4.1.11 Population and Housing**

##### **Threshold: Displace People or Housing Necessitating Construction or Replacement Housing**

The Project site is an existing vacant commercial development. Hence, no housing units would be displaced as a result of Project construction. Thus, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. (IS, p. 81).

#### **4.1.12 Transportation**

##### **Threshold: Increase Hazards Due to a Geometric Design Feature or Incompatible Uses**

The Initial Study determined the proposed Project's internal road network would be designed to comply with the City's development review process including review for compliance with all applicable fire code requirements for construction and access to the site. Project access does not include new travel lanes outside of the Project's footprint and has been designed in conformance with the City's engineering and fire department standards. Additionally, the Project would continue to utilize four of the six existing driveways. As a result, the project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. (IS, p. 84).



### **Threshold: Result in Inadequate Emergency Access**

The Project will leave in place four of the existing full access driveways: two along Arlington Avenue and two along Streeter Avenue. All project access improvements have been designed in conformance with City engineering and fire department standards for emergency access and circulation, and all local roadways would remain open during Project construction and operation. The design of Project access and internal circulation routes, as well as the size and location of fire suppression facilities (e.g., hydrants and sprinklers), would be subject to City standards and conditions of approval. Thus, implementation of the proposed Project would not Result in inadequate emergency access and impacts would be less than significant. (IS, p. 85).

### **4.1.13 Utilities and System Services**

#### **Thershold: Comply with Federal, State, and Local Management and Reduction Statutes and Regulations related to Solid Waste**

Based on the Initial Study, California cities and counties are required to achieve waste diversion goals. The Project must comply with the City's waste disposal and CALGreen requirements. Therefore, compliance with City waste disposal and CALGreen would ensure compliance with federal, state, and local management and reduction statutes. Thus impacts regarding compliance solid waste regulations would be less than significant. (IS, p. 88).

### **4.1.14 Wildfire**

#### **Threshold: Substantially Impair an Adopted Emergency Plan or Emergency Evacuation Plan**

According to the Initial Study, the Project site is not located in a State Responsibility Area (SRA) or designated as a very high, high, or moderate hazard severity zone by the City. Further, the Project will not impair an adopted emergency response plan or emergency evacuation plan so impacts would be less than significant. (IS, p. 88).

#### **Threshold: Expose Project Occupants to Pollutant Concentrations from Wildfire or Spread of Wildfire Due to Slope, Prevailing Winds, and other Factors Exacerbated**

The Project site is not located within a SRA, or a very high fire, high or moderate hazard severity zone and the Project site has no steep slopes and is not located on or adjacent to affected lands that would exacerbate wildfire risk. Thus, the Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. (IS, pp. 88-89).

#### **Threshold: Require the Installation or Maintenance of Associated Infrastructure that may Exacerbate Fire Risk or may Result in Impacts to the Environment**

The Project site is generally flat with no steep slopes located on or adjacent to the Project site and the site is not located in or adjacent to a very high fire, high or moderate hazard severity zone. The Project site is fully served by existing roads and utilities. As such, the Project will not need to construct any new roads, fuel breaks, power lines or other utilities. Thus, the Project would not require the installation or

maintenance of new associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. (IS, p. 89).

**Threshold: Expose People to Downslope or Downstream Flooding or Landslides, as a Result of Runoff, Post-Fire Slope Instability, or Drainage Changes**

The Project site and surrounding lands are relatively flat and the site is not located in or adjacent to a very high fire, high or moderate hazard severity zone. As such, the risk of downslope or downstream flooding or landslide hazards is low to nonexistent. Thus, the Project would not expose people or structures to significant risks including downslope or downstream flooding or landslides because of runoff, post-fire slope instability, or drainage changes. (IS, p. 89).

## 5.0 Environmental Analysis

Sections 15126, 15126.2 and 15126.4 of the State *CEQA Guidelines* require consideration and discussion of significant environmental effects and mitigation measures proposed to minimize significant effects. All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation (Section 15126) and an EIR shall identify and focus on the significant effects of the proposed Project on the environment (Section 15126.2).

Sections 5.1 through 5.14 of the Draft EIR examine the potential environmental impacts associated with implementation of the proposed Project and focuses on the following issues:

- Aesthetics (Section 5.1)
- Air Quality (Section 5.2)
- Cultural Resources (Section 5.3)
- Energy (Section 5.4)
- Greenhouse Gas Emissions (Section 5.5)
- Hazards and Hazardous Materials (Section 5.6)
- Land Use and Planning (Section 5.7)
- Noise (Section 5.8)
- Population and Housing (Section 5.9)
- Public Services (Section 5.10)
- Recreation (5.11)
- Traffic and Transportation (5.12)
- Tribal Cultural Resources (Section 5.13)
- Utilities and Service Systems (Section 5.14)

### Technical Studies

Technical studies providing detailed technical analyses that were used in this Draft EIR were prepared for various environmental issues, such as air quality, biological resources, energy, greenhouse gas emissions, hydrology and water quality, noise, transportation, and tribal cultural resources. These documents are identified in the discussion for the individual environmental issue and included as technical appendices to the Draft EIR.

### Analysis Format

The Draft EIR assesses how the proposed Project would impact the issue areas identified above. Each environmental issue addressed in this Draft EIR is presented in terms of the following subsections:

**Setting:** Provides information describing the existing setting on or surrounding the Project site which may be affected as a result of the implementation of the Project and provides a description of the “baseline” conditions from which potential impacts are assessed. This section describes the physical conditions that existed when the IS/NOP was published and sent to responsible agencies and the State Clearinghouse.

**Related Regulations:** Provides a discussion of the applicable regulations with respect to each environmental issue.



**Comments Received in Response to the Initial Study/Notice of Preparation:** Provides information regarding if comment letters were received in response to the Initial Study/Notice of Preparation (IS/NOP), and if so, how many and from whom.

**Thresholds of Significance:** Provides criteria for determining the significance of Project impacts for each environmental issue.

**Project Design Features:** Provides a discussion of the Project design features as it relates to each environmental issue. Project design features are those features or elements of the Project that serve to avoid or minimize potential environmental impacts.

**Methodology:** Approach used to identify and evaluate the potential impacts of the project.

**Environmental Impacts:** Provides a discussion of the characteristics of the proposed Project that may have an effect on the environment; analyzes the nature and extent to which the proposed Project is expected to change the existing environment, and whether or not the Project impacts are less than or exceed the levels of significance thresholds.

**Recommended Mitigation Measures:** Identifies mitigation measures to reduce significant adverse impacts to the extent feasible.

**Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented:** Provides a discussion of significant adverse environmental impacts that cannot be feasibly mitigated or avoided, significant adverse environmental impacts that can be feasibly mitigated or avoided, adverse environmental impacts that are not significant, and beneficial impacts.

## 5.1 Aesthetic Resources

The focus of this section is to analyze potential impacts related to Aesthetic Resources. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics.

### 5.1.1 Setting

The Project site is located in an urbanized setting in the City of Riverside (City) at the northeast corner of Streeter Avenue and Arlington Avenue. The Project site is surrounded by a variety of land uses including commercial, medium-high density residential, high-density residential, office and public facilities. Surrounding land uses are outlined in **Table 3.0-A** in Section 3.0 – Project Description of this DEIR.

The existing Project site includes two existing commercial buildings located on the 17.37 net acre parcel that are associated with the former Sears Department Store and Automotive Service Center constructed in 1964. The existing site conditions and structures are discussed in further detail and reflected on **Figure 3.0-12** in Section 3.0 – Project Description and Section 5.3 – Cultural Resources of this Draft EIR.. The balance of the remaining Project site is composed of asphalt-paved parking areas, driveways, and minor landscaping of ornamental trees and shrubs. The site is generally flat, with outlines of hillsides to the north and west.

### Scenic Vistas, Resources, and Visual Character

The City is mostly developed and considered an urbanized area. The hills and ridgelines that surround the City provide scenic vistas to residents of Riverside where they are able to experience long distance views of natural terrain. Vista points are found throughout the City, both as viewed from urban areas toward the hills and from the wilderness areas toward Riverside. The most notable scenic vistas in the City include the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs Mountain Regional Park. The peaks of Box Springs Mountain, Mt. Rubidoux, Arlington Mountain, Alessandro Heights and the La Sierra/Norco Hills provide scenic views of the City and the region. (GP 2025 FEIR, p. 5.1-2).

The higher elevation hills shape the visual outline and drainage area of the City's viewshed. Specifically, the La Sierra/Norco Hills, Mt. Rubidoux, Box Springs Mountains, Sycamore Canyon, and the many smaller ranges south of the City provide a visual backdrop as viewed from streets, buildings, and open spaces. Nearly every neighborhood in Riverside features some areas of local hills, from southern Arlanza to Hawarden Ridge. These create vistas from many of Riverside's neighborhoods, its local streets and even residents' back yards. (GP 2025 FEIR, p. 5.1-2).

The City has designated several scenic and special boulevards within the City that meet local criteria for designation as scenic routes. Arlington Avenue has been designated as a Scenic Boulevard

### Cultural Resources

The City is comprised of cultural resources that form a rich backdrop of both familiar and pleasing streetscapes experienced by Riverside's citizens on a daily basis. These resources enrich the City's character and form cornerstone of successful revitalization and preservation efforts. The City has identified historic neighborhoods as Historic Districts and Neighborhood Conservation Area. However, the City holds cultural resources throughout the City in structures, such as single-family residences to

commercial, religious, and civic buildings as well as bridges, City parks, and trees. These areas and structures have a significant concentration of cultural resources that represent themes important to local history. (GP 2025 FEIR, p. 5.1-4)

## 5.1.2 Related Regulations

### Federal Regulations

There are no federal regulations applicable to the proposed Project.

### State Regulations

The State of California maintains a State Scenic Highway System that includes a list of highways that are eligible for designation as a scenic highway or have already been officially designated. Section 263 of the State's Streets and Highways Code contains the full list. Within the City no state-designated or eligible scenic highways exist. The nearest eligible state scenic highway is Interstate 15 (I-15) that runs approximately one mile away from the City and its sphere of Influence. (GP 2025 FEIR, p. 5.1-4, 5.1-5)

### Regional Regulations

There are no regional regulations applicable to the proposed Project.

### Local Regulations

#### *City of Riverside 2025 General Plan*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. LU-26, LU-29, LU-33, LU-44, OS-8, HP-25 – HP-26, HP- 28):

#### **Land Use and Urban Design Element**

Objective LU-8	Emphasize smart growth principles through all steps of the land development process.
Policy LU-8.1	Ensure well-planned infill development Citywide, allow for increased density in selected areas along established transportation corridors.
Objective LU-11	Create a network of parkways to establish stronger linkages between Riverside's neighborhoods, major elements of its natural environment and neighborhood parks and schools.
Policy LU-11.1	Recognize parkways as distinctive elements of the City's circulation network.
Policy LU-11.2	Recognize Victoria Avenue, Magnolia Avenue/Market Street, University Avenue, Van Buren Boulevard, Riverwalk Parkway, La Sierra Avenue, Arlington Avenue, Canyon Crest Drive, and Overlook Parkway as the fundamental elements of the City's parkway landscape network, and components of Riverside Park
Policy LU-11.3	Seek opportunities to provide enhanced bicycle and pedestrian usage along parkways through the development process.
Objective LU-20	Recognize and enhance Arlington Avenue as a cross-city roadway that connects east to west.



- Policy LU-20.1            Develop a landscaped parkway with distinctive signage that promotes the function of Arlington Avenue as a roadway that connects and links many neighborhoods and business centers.
- Objective LU-27            Enhance, maintain, and grow Riverside's inventory of street trees.
- Policy LU-27.1            Require appropriately sized landscaped parkways in all new development. Parkway areas shall be of sufficient width to allow planting of trees that will become large canopy trees.
- Policy LU-27.3            Seek ongoing cooperation from residents in the maintenance, conservation, and protection of street trees.
- Policy LU-27.4            Encourage trees on private property to add to the City's urban forest.

***Open Space and Conservation Element***

- Objective OS-2            Minimize the extent of urban development in the hillsides, and mitigate any significant adverse consequences associated with urbanization.
- Policy OS-2.5            Review the feasibility of creating a "night-time sky" ordinance to reduce light pollution.

*City of Riverside 2025 General Plan EIR*

The are no applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to Aesthetic Resources.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.

*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUI EIR that pertain to Aesthetic Resources.

*City of Riverside Municipal Code*

The following sections of the City's Municipal Code are applicable and pertain to Aesthetic Resources:

**Chapter 19.120.050 Development Standards.** This chapter identifies the development standards applicable to all development in the mixed-use zones.

**Chapter 19.550 – Fence, Walls, Landscape Materials.** This chapter sets forth standards for the construction and maintenance of fences, walls, and landscape materials to ensure that such features are aesthetically pleasing and provide for privacy and safety without obstructing views and without creating a public safety hazard or nuisance.

**Chapter 19.554 – Trash/Recyclable Materials Collection Area Enclosures.** This chapter sets forth standards for the construction of trash/recyclable materials collection area enclosures to ensure that such features are aesthetically pleasing and screen the trash and recycle containers without obstructing views or causing a public safety hazard or nuisance.

**Chapter 19.556.010 – Outdoor Lighting.** This chapter sets forth standards to ensure that outdoor lighting is adequate for safety, security and commerce while preserving the naturally dark night sky by mitigating artificial sky glow and preventing glare and light trespass

**Chapter 19.560 – Building Height Measurement.** The purpose of this chapter is to establish a method for measuring the height of structures in compliance with the height limits set forth in the Zoning Code and specifies exceptions to height limit.

**Chapter 19.640 – General Permit Provisions.** The purpose of this chapter is to establish the overall structure for the application, review, and action on discretionary permits and legislative actions. Additionally, it identifies and describes the permits regulated by the Zoning Code and identifies those minor activities, uses, and structures that are exempt from permit requirements while requiring compliance with all applicable laws and regulations.

*City of Riverside Citywide Design Guidelines and Sign Guidelines*

The City of Riverside adopted *Citywide Design Guidelines and Sign Guidelines* in November 2007 which were later amended and approved in January 2019 (RCDG-B). The purpose of these guidelines are to reinforce the physical image of Riverside which the City's prosperity, well-being, and the value and contribution of agriculture, cultural diversity, industry and manufacturing, education, and architectural heritage of the city. The image of the City's residential neighborhoods and neighborhood shopping centers emphasizes a small-town character within an urban metropolis. The physical image of Riverside provides an aesthetic that attracts the City's work force, employers, residents, and visitors. The guidelines work to reinforce this physical image of Riverside and are intended to promote quality, well-designed development throughout Riverside that enhances existing neighborhoods, creates identity, and improves the overall quality of life within the City by promoting a desired level of future development within the City. (RCDG-B, p. I-1).

*City of Riverside Urban Forestry Policy Manual*

The City of Riverside is known as a "City of Trees." Trees beautify the landscape and enhance the quality of life for all residents. Therefore, the City has created a manual with guidelines that can be used for reference by City Staff, private contractors, volunteer organizations and citizens when working in and around trees within City jurisdiction. (UFPM, p. 3).

**Tree Removals Guidelines.** The Public Works Department is responsible for the maintenance of the street tree system. Individual trees can affect the environment of the total community. The Public Works Director or the Director's designee shall have the authority to remove any hazardous, diseased, or declining trees, providing that the removals meet the existing criteria as stated in the policy. The Director or Designee shall authorize all tree removals with the authority granted in this policy and a quarterly report will be provided to the Park and Recreation Commission. The Director shall provide the Park and Recreation Commission with a quarterly listing of the tree removals for the Commission's review. The list shall include the locations of the trees and the reason for removal (UFPM, p. 14).

### **5.1.3 Comments Received in Response to the Initial Study/Notice of Preparation**

No comments were received regarding Aesthetic Resources in response to the Initial Study/Notice of Preparation (IS/NOP).

### 5.1.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the Initial Study (Appendix A), and as presented in Section 4.0 of this DEIR, implementation of the proposed Project will have a less than significant impact in the following areas and these topics are not addressed in this DEIR:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; and
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impact in the following area and this topic is addressed in this DEIR:

- In a non-urbanized area, would substantially degrade the existing visual character or quality of public views of the site and its surroundings. In an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality.

### 5.1.5 Project Design Features

The Project proposes to demolish the existing Sear Department Store and Sears Auto Center buildings. As such, architectural features that give a nod to the Mid-Century Modern architectural style denoted by the two Sears structures will be incorporated into the design to provide tribute to these structures. The double-volume standalone Clubhouse / Leasing/Fitness Center as depicted in **Figure 5.1-1, Architectural Features (Clubhouse/Leasing/Fitness)**, is proposed to be located at the core of the proposed development, paying homage to the Mid-Century history of the existing Sears building. The white and tan central massing is highlighted at the entry by a striking, butterfly-style folded metal awning, a typical feature seen in Mid-Century architectural style. This is proposed along the area of the north façade of the existing Sears building and repeated on the rear of the clubhouse, tying the existing and newly proposed architecture opening to the main pool recreation area. Clubhouse/Leasing/Fitness Center is designed to reach a maximum height of 22 feet and 7-inches including parapets to screen rooftop equipment.

The three-story townhomes will be sited near Streeter Avenue and the interior of the Project Site. Two-story residential structures will be located along the northern and eastern perimeter of the site complimenting the existing office and residential neighborhoods. As depicted in **Figures 3.0-14 through 3.0-19** of this Draft EIR, the proposed apartments and townhomes will be designed based on a classical contemporary design, complementing the Clubhouse/Leasing/Fitness Center, united through colors and enhanced materials. Each residential building is anchored by tower elements on each end, decorated in the enhanced siding used on the Clubhouse, and topped with varying moldings adding richness and texture. Buildings are designed so as not to exceed 36 feet in height of habitable area and include parapets to screen any rooftop equipment. Three story structures are proposed to reach a maximum of



41 feet and 3-inches in height. Two-story structures are proposed to reach a maximum height of 28 feet and 2-inches.

The architecture of the commercial component is also inspired by the Mid-Century architectural principles as the color and material palette will follow the neutral style of the existing Sears building, and the canopies at the main entry point will reflect similar language as depicted in **Figure 5.1-2, Architectural Features (Retail)**. Commercial areas will be sited along Arlington Avenue to separate them from residential uses. Commercial retail structures are designed to a height of 27 feet and 2-inches including parapets to screen rooftop equipment. The proposed grocery store is designed to a maximum of 31 feet in height as depicted in **Figures 3.0-20 and 3.0-21** found in Section 3.0 – Project Description of this Draft EIR.

A pedestrian promenade and multiple areas encouraging the use of outdoor spaces as depicted in **Figures 3.0-23 and 3.0-32** found in Section 3.0 – Project Description of this Draft EIR, will be provided throughout the Project site. Residential parking areas are sited toward the interior of the site with many areas providing parking under the residential structure. Commercial parking is sited closer to Arlington to reduce the amount of interference with nearby residences.







The Project will incorporate landscaping within the right-of-way and throughout the Project site consistent with *City of Riverside Urban Forestry Policy Manual*. Pedestrian paths, open space features, and styles and colors will be in accordance with *Citywide Design Guidelines and Sign Guidelines* and will be complimentary to the surrounding existing community. The Project will also utilize screening walls and parapets to conceal the commercial loading dock and mechanical equipment, respectively. Gates and block walls will also be included to screen residential parking from the commercial areas and existing surrounding uses as depicted in **Figures 3.0-28** and **3.0-29** found in Section 3.0 – Project Description of this Draft EIR.

### 5.1.6 Methodology

The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refer to the identification of visual resources and the quality of what can be seen, as well as an overall visual perception of the environment. This analysis identifies and objectively examines factors that contribute to the perception of aesthetic impacts. Potential aesthetic impacts are evaluated by considering proposed grade separations, landform alteration, building setbacks, scale, massing, building height, and landscaping features associated with the design of a project. It should be noted that there are not any locally designated or defined standards or methodologies for the assessment of aesthetic impacts.

### 5.1.7 Environmental Impacts

***Threshold: In a non-urbanized area, would the proposed Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? In an urbanized area, would the proposed Project conflict with applicable zoning and other regulations governing scenic quality?***

According to *CEQA Statute and Guidelines* §21071, a city that has a population of at least 100,000 is considered to be an urbanized area. The City's current population is approximately 313,676 people so the City is considered an urbanized area (DOF). The site is surrounded by a mix of existing residential, office, and commercial uses. The Project includes a General Plan Amendment (GPA) and Rezone (RZ) which will bring the Project site's land use and zoning designations consistent with the proposed uses. The City's development standard for a MU-V site require minimum lot area of 20,000 square feet (sf), a maximum building height of 45 feet (ft), and a minimum common open space requirement of 50 sf per dwelling unit (du) for both private and common open space. The Project proposes development of residential uses across 546,474 sf so will meet the minimum lot area requirement. The proposed buildings will have a maximum building height of 41.5 ft so will not exceed the height requirement. Last, the Project will be required to provide 19,400 square feet of private open space and the same for public/common areas for a total of 38,800 sf. The Project will include 36,502 sf of private open space associated with each of the residential building areas, as well as 57,071 sf in the public/common areas for a total of 93,573 sf of open space throughout the proposed development. Hence, the Project will meet open space requirements. Additionally the Project proposes a residential density of 22.3 dwelling units per acre (du/ac)<sup>1</sup> which is consistent with the MU-V Mixed Use-Village designation allowing a maximum of 30 du/ac. The Project would integrate residential and commercial uses seamlessly within the existing surrounding neighborhoods and would be required to comply with all applicable municipal codes. Electric improvements requiring offsite trenching will also be required as part of the Project. However, improvements performed within the off-site alignment will take place subsurface and the off-site area will be restored to its previous condition.

1. 388 Dwelling Units ÷ 17.43 gross acres = 22.3 du/ac

As discussed in Section 3.0 – Project Description of this Draft EIR, the former Sears structures have been mostly vacant since February 2020. A portion of the former Sears Department Store has occasionally been utilized as a seasonal store. The site’s parking lot was briefly used in 2020 as a COVID drive-thru testing site and a portion of southeastern corner has been utilized for the Riverside Certified Farmers Market. The proposed Project would provide land uses complimentary to the existing surrounding environment and remove vacant structures and a vast parking area that have mostly vacant and underutilized.

Existing surrounding residential structures are single-story. Habitable structures located within the existing residential neighborhoods east of the Project site are generally setback 37 to 79 feet from the Project sites property line. Habitable structures located within the existing residential neighborhoods north of the Project site are generally setback 24 to 43 feet from the Project site’s property line. One exception is a property at the northeastern most corner is only 8 feet from the property line which is actually non-compliant with its R-1-7000 zoning requiring a 25 foot minimum setback. Two-story structures would be sited along these areas and set back approximately 25 foot feet from the property line with a landscape buffer that includes screening trees. A six foot split-face block wall would also be provided on the north and eastern property boundaries. Three-story structures would be placed within the interior of the site and along Streeter Avenue. This placement of residential structures would reduce impacts to the surrounding existing residential neighborhoods since the Project is required to comply with setbacks and standards established for the MU-V zone; thereby reducing visual impacts to existing uses.

The existing Sears Department Store structure is 36 feet in height with loading docks visible from the north while the existing Sears Auto Service Center structure is approximately 17 feet in height. With implementation of PDF’s, no building is proposed to exceed the maximum building height requirement of 45 feet as set forth by Chapter 19.120.050 of the municipal code. Commercial and residential areas have been thoughtful in their placement by siting the more intense uses along the Project site’s interior, Streeter Avenue, and Arlington Avenue. PDFs also utilize a color palette complimentary to the surrounding area for all proposed buildings. Projected views of the residential products are depicted in **Figure 5.1-3, View of Entry/Residential from Streeter Avenue**. The Project would also include landscaped outdoor space, dog park, pedestrian promenade, and extensive non-vehicular circulation to encourage a mixture of activities for employees, visitors, and residents. Existing landscape would be removed and replaced as identified by the Project’s proposed Conceptual Landscape Plan as identified in **Figure 3.0-24** found in Section 3.0 – Project Description of this DEIR. New open space and pedestrian connectivity areas are depicted in **Figure 5.1-4, Views of Townhomes and Pedestrian Connectivity**.

The commercial buildings and site access are purposely designed to distinguish, separate, and facilitate pedestrian and vehicle access. The Project would provide intentional equipment screening and building placement along Arlington Avenue and Streeter Avenue in order to not disrupt the existing street view. Proposed screening methods for loading docks and applicable mechanical equipment to be tucked away from view are reflected in **Figure 3.0-19** found in Section 3.0 – Project Description of this DEIR.

Further, as part of the review process, the Project would also be required to comply with *Citywide Design Guidelines and Sign Guidelines* and the *City of Riverside Urban Forestry Policy Manual* to reinforce the physical image of Riverside. The proposed Project would help to improve the appearance of the existing site.

Thus, with implementation of PDF's, compliance with local regulations and design standards, and consistency with GP goals and policies related to aesthetics, the proposed Project would not conflict with applicable zoning and other regulations governing scenic quality in an urbanized area. Therefore, impacts are **less than significant**.

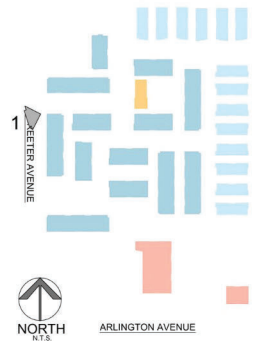


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VIEW OF MAIN ENTRY TO MULTIFAMILY RESIDENTIAL ALONG STREETER AVENUE 1

KEY MAP



Source: Architects Orange, Mar. 2023.

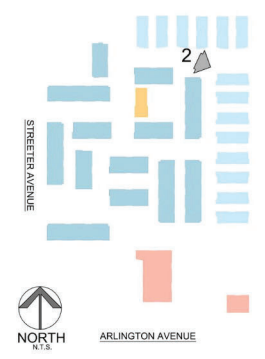
**Figure 5.1-3 View of Entry/Residential from Streeter Avenue**  
Arlington Mixed Use



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KEY MAP



TYPICAL VIEW OF TOWNHOMES AND PEDESTRIAN CONNECTIVITY 2

Source: Architects Orange, Mar. 2023.

**Figure 5.1-4 Views of Townhomes and Pedestrian Connectivity**  
Arlington Mixed Use



### **5.1.8 Recommended Mitigation Measures**

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4) to scenic resources. There are no mitigation measures required to reduce impacts to Aesthetic Resources since impacts are less than significant.

### **5.1.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

There are no mitigation measures required to reduce impacts to Aesthetic Resources.



## 5.2 Air Quality

The focus of this section is to analyze potential impacts related to air quality. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics of this Draft EIR.

The analysis in this section is based on the *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for the Arlington Mixed Use Development Project, City of Riverside, California*, prepared by Albert A. Webb Associates dated October 27, 2023 (WEBB-A). This report is contained within its entirety in Appendix B of this Draft EIR.

### 5.2.1 Setting

The Project site is located in the center area of the City of Riverside. The Project site has existing City of Riverside General Plan (GP) land use designation of C-Commercial and a zoning designation of CG – Commercial General as reflected in **Figure 3.0-5** and **Figure 3.0-6** of Section 3.0 – Project Description of this Draft EIR

#### Physical Setting

The proposed Project is located within the South Coast Air Basin (the Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Basin consists of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Regional and local air quality within the Basin is affected by topography, atmospheric inversions, and dominant onshore flows. Topographic features such as the San Gabriel, San Bernardino, and San Jacinto Mountains form natural horizontal barriers to the dispersion of air contaminants. The presence of atmospheric inversions limits the vertical dispersion of air pollutants. With an inversion, the temperature initially follows a normal pattern of decreasing temperature with increasing altitude; however, at some elevations, the trend reverses and temperature begins to increase as altitude increases. This transition to increasing temperature establishes the effective mixing height of the atmosphere and acts as a barrier to vertical dispersion of pollutants. (SCAQMD 1993, p. A8-2).

Dominant onshore flow provides the driving mechanism for both air pollution transport and pollutant dispersion. Air pollution generated in coastal areas is transported east to inland receptors by the onshore flow during the daytime until a natural barrier (the mountains) is confronted, limiting the horizontal dispersion of pollutants. The result is a gradual degradation of air quality from coastal areas to inland areas, which is most evident with the photochemical pollutants such as ozone formed under reactions with sunlight. (SCAQMD 1993, pp. A8-1–A8-2).

#### Climate

Terrain and geographical location determine climate in the Basin. The Project site lies within the terrain south of the San Gabriel and San Bernardino Mountains and East of the Santa Ana Mountains. The climate in the Basin is typical of southern California's Mediterranean climate, which is characterized by dry, warm summers and mild winters. Winters typically have infrequent rainfall, light winds, and frequent early morning fog and clouds that turn to hazy afternoon sunshine. (SCAQMD 1993, pp. A8-1–A8-2).

The following includes factors that govern micro-climate differences among inland locations within the basin: 1) the distance of the mean air trajectory from the site to the ocean; 2) the site elevation; 3) the

existence of any intervening terrain that may affect airflow or moisture content; and 4) the proximity to canyons or mountain passes. As a general rule, locations farthest inland from the ocean have the hottest summer afternoons, the lowest rainfall, and the least amount of fog and clouds. Foothill communities in the Basin have greater levels of precipitation, cooler summer afternoons and may be exposed to wind funneling through nearby canyons during Santa Ana winds. Terrain will generally steer local wind patterns. (SCAQMD 1993, pp. A8-1–A8-2).

The Project site is located within the City of Riverside, north of the CA-91 freeway as is reflected in **Figure 3.0-1** of Section 3.0 – Project Description of this Draft EIR, within the eastern portion of the Basin (SCAQMD Map). More specifically, the Project site is bound by residences along Sierra Street to the north, Streeter Avenue to the west, Arlington Avenue to the south, and residences along Capistrano Way to the east as reflected in **Figure 3.0-3** also found in Section 3.0 – Project Description of this Draft EIR.

### Precipitation and Temperature

Annual average temperatures in the Basin are typically in the low to mid-60s (degrees Fahrenheit, or °F). Temperatures above 100 °F are recorded for all portions of the basin during the summer months. (SCAQMD 1993, p. A8-1).

The climatological station closest to the Project site is a National Weather Service (NWS) Cooperative station located in Riverside. As shown in **Table 5.2-A, Riverside Fire Station 3, Meteorological Data**, climatological data from the NWS at this station spanning from 1981-2010 shows an annual average temperature of 66.6° F.<sup>1</sup> with December as the coldest month (mean daily minimum temperatures of 41.6° F) and August as the warmest month of the year (mean daily maximum temperatures of 95.7° F). (WRCC).

The rainy season in the basin is from November to April. Summer rainfall can occur as widely scattered thunderstorms near the coast and in the mountainous regions in the eastern basin. Rainfall averages vary over the basin. For example, the City of Riverside averages 9 inches of rainfall, while the City of Los Angeles averages 14 inches. Rainy days vary from 5 to 10 percent of all days in the basin, with the most frequent occurrences of rainfall near the coast. (SCAQMD 1993, p. A8-1).

Over this same period of time, the climatological data from the Riverside Fire Station 3 NWS Cooperative station shows an annual average precipitation of 9.89 inches. Approximately eighty-two percent of the annual rainfall occurs during the November to March rain season.<sup>2</sup> The highest monthly average rainfall occurs during February. However, year to year patterns in rainfall are unpredictable due to fluctuations in the weather. General meteorological data as measured at the Riverside Fire Station 3 weather station is shown in **Table 5.2-A, Riverside Fire Station 3 Metrological Data** below. (WRCC).

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1. From Table 5.2-A: (annual average high of 80.8 + annual average low of 52.3) / 2 = 66.55

2. From Table 5.2-A: sum of average precipitation November – March: 8.16 / annual average precipitation: 9.98 = 0.82, or 82 percent.

**Table 5.2-A, Riverside Fire Station 3 Metrological Data**

Month	Temperature (°F)		Average Precipitation (inches)
	Average High	Average Low	
January	69.1	42.3	1.81
February	69.8	44.3	2.39
March	73.1	46.4	1.79
April	77.6	49.8	0.70
May	82.4	54.9	0.19
June	88.4	58.9	0.08
July	94.6	63.3	0.04
August	95.7	64.1	0.12
September	91.5	60.7	0.15
October	83.5	54.1	0.46
November	72.6	44.9	0.78
December	68.8	41.6	1.39
<b>Annual Average</b>	<b>80.8</b>	<b>52.3</b>	<b>9.89</b>
Source: WRCC			

**Winds**

The interaction of land (offshore) and sea (onshore) breezes control local wind patterns in the area. Daytime winds typically flow from the coast to the inland areas, while the pattern typically reverses in the evening, flowing from the inland areas to the ocean. Air stagnation may occur in the early evening and early morning during periods of transition between day and nighttime flows.

Approximately 5 to 10 times a year, the project site vicinity experiences strong, hot, dry desert winds known as the Santa Ana winds. These winds, associated with atmospheric high pressure, originate in the upper deserts, and are channeled through the passes of the San Bernardino Mountains and into the inland valleys. Santa Ana winds can last for a period of hours or days, and gusts of over 60 miles per hour have been recorded.

High winds, such as the Santa Ana winds, affect dust generation characteristics, and create the potential for off-site air quality impacts, especially with respect to airborne nuisance and particulate emissions. Local winds in the project area are also an important meteorological parameter because they control the initial rate of dilution of locally generated air pollutant emissions. (GP 2025 FEIR, pp. 5.3-4-5.3-5).

**Categories of Emission Sources**

Air pollutant emissions sources are typically grouped into two categories: stationary and mobile sources. These emission categories are defined and discussed in the following subsections.

**Stationary Sources**

Stationary sources are divided into two major subcategories: point and area sources. Point sources consist of a single emission source with an identified location at a facility. A single facility could have multiple point sources located on-site. Stationary point sources are usually associated with



manufacturing and industrial processes. Examples of point sources include boilers or other types of combustion equipment at oil refineries, electric power plants, etc. Area sources are small emission sources that are widely distributed but are cumulatively substantial because there may be a large number of sources. Examples include residential water heaters; painting operations; lawn mowers; agricultural fields; landfills; and consumer products, such as barbecue lighter fluid and hair spray. (SCAQMD 1993, p. 1-1).

### Mobile Sources

Mobile sources are motorized vehicles, which are classified as either on-road or off-road. On-road mobile sources typically include automobiles and trucks that operate on public roadways. Off-road mobile sources include aircraft, ships, trains, and self-propelled construction equipment that operate off public roadways. Mobile source emissions are accounted for as both direct source emissions (those directly emitted by the individual source) and indirect source emissions, which are sources that by themselves do not emit air contaminants but indirectly cause the generation of air pollutants by attracting vehicles. Examples of indirect sources include office complexes, commercial and government centers, sports and recreational complexes, and residential developments. (SCAQMD 1993, p. 1-2).

### Air Pollution Constituents

#### *Criteria Pollutant*

Air pollutants are classified as either primary or secondary, depending on how they are formed. Primary pollutants are generated daily and are emitted directly from a source into the atmosphere. Examples of primary pollutants include: carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), nitric oxide (NO), sulfur dioxide (SO<sub>2</sub>), particulates (PM-10 and PM-2.5) and various hydrocarbons (HC), also known as volatile organic compounds (VOC) or reactive organic gases (ROG).

Secondary pollutants are created over time and occur within the atmosphere as chemical and photochemical reactions take place. An example of a secondary pollutant is ozone (O<sub>3</sub>), which is one of the products formed when oxides of nitrogen (NO<sub>x</sub>) reacts with hydrocarbons (HC), in the presence of sunlight. The predominant source of air emissions generated by the Project development is expected to be vehicle emissions. Motor vehicles primarily emit CO, NO<sub>x</sub>, and VOC/ROG/HC (Volatile Organic Compounds/Reactive Organic Gases/Hydrocarbons). (GP 2025 FEIR, p. 5.3-5).

The Federal Clean Air Act of 1970 established the National Ambient Air Quality Standards (NAAQS). Six “criteria” air pollutants were identified using specific medical evidence available at that time, and NAAQS were established for those chemicals. The State of California has adopted the same six chemicals as criteria pollutants but has established different allowable levels. The six criteria pollutants are: CO, NO<sub>2</sub>, O<sub>3</sub>, Pb, PM-10, PM-2.5, and SO<sub>2</sub> (EPA 2023). The following is a further discussion of the pollutants mentioned above, as well as VOCs.

- **Carbon Monoxide (CO)** – A colorless, odorless toxic gas produced by incomplete combustion of carbon-containing substances. Concentrations of CO are generally higher during the winter months when meteorological conditions favor the build-up of primary pollutants (EPA 2023). Automobiles are the major source of CO in the basin, although various industrial processes also emit CO through incomplete combustion of fuels. In high concentrations, CO can cause serious health problems in humans by limiting the red blood cells’ ability to carry oxygen. (SCAQMD 1993, p. 3-2).

- **Oxides of Nitrogen (NO<sub>x</sub>)** – Those that are important in air pollution are nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>). NO is a colorless, odorless gas formed by a combination of nitrogen and oxygen when combustion takes place under high temperatures and pressures. NO<sub>2</sub> is a reddish-brown gas formed by the combination of NO with oxygen. Combustion in motor vehicle engines, power plants, refineries, and other industrial operations, as well as ships, railroads, and aircraft are the primary sources of NO<sub>x</sub>. NO<sub>2</sub> at atmospheric concentrations is a potential irritant that can cause coughing in healthy people; can alter respiratory responsiveness and pulmonary functions in people with preexisting respiratory illness; and potentially lead to increased levels of respiratory illness in children. (EPA 2023).
- **Ozone (O<sub>3</sub>)** – A colorless, toxic gas that irritates the lungs and damages materials and vegetation. During the summer’s long daylight hours, plentiful sunshine provides the energy needed to fuel photochemical reactions between NO<sub>2</sub> and VOC which result in the formation of O<sub>3</sub>. Conditions that lead to high levels of O<sub>3</sub> are adequate sunshine, early morning stagnation in source areas, high surface temperatures, strong and low morning inversions, greatly restricted vertical mixing during the day, and daytime subsidence that strengthens the inversion layer (all of which are characteristic of western Riverside County). Ozone represents the worst air pollution-related health threat in the basin as it affects people with preexisting respiratory illness, as well as reduces lung function in healthy people. Studies have shown that children living within the basin experience a 10–15 percent reduction in lung function. (SCAQMD 1993, p. 3-2).
- **Atmospheric Particulate Matter (PM)** – Made up of fine solid and liquid particles, such as soot, dust, aerosols, fumes, and mists. PM-10 consists of particulate matter that is 10 microns or less in diameter, and PM-2.5 consists of particulate matter of 2.5 microns or less in size. Both PM-10 and PM-2.5 can be inhaled into the deepest part of the lung, attributing to health effects. The presence of these fine particles by themselves cause lung damage and interfere with the body’s ability to clear its respiratory tract. Said particles can also act as a carrier of other toxic substances. (SCAQMD 1993, p. 3-3).

Sources that contribute to particulate matter pollution include: road dust, windblown dust, agriculture, construction, fireplaces, and wood burning stoves, and vehicle exhaust. Specifically, SCAQMD data indicates that the largest component of PM-10 particles in the area comes from dust (unpaved roads, unpaved yards, agricultural lands, and vacant land that has been disked). PM-2.5 particles are mostly manmade particles resulting from combustion sources. Organic carbon particles generated from paints, degreasers, and vehicles are another component of PM<sub>2.5</sub> pollution. The last notable constituent of PM-2.5 sources is elemental carbon, which is used as a surrogate for diesel particulates. (EPA 2023).

- **Sulfur Dioxide (SO<sub>2</sub>)** – A colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. SO<sub>2</sub> can result in temporary breathing impairment in asthmatic children and adults engaged in active outdoor activities. When combined with PM, SO<sub>2</sub> can cause symptoms such as shortness of breath and wheezing; and, with long-term exposure, it can lead to the exacerbation of existing cardiovascular disease and respiratory illnesses. (EPA 2023). Although SO<sub>2</sub> concentrations have been reduced to levels well below state and federal standards, further reductions in SO<sub>2</sub> emissions are needed because SO<sub>2</sub> is a precursor to sulfate and PM-10.

- **Lead (Pb)** – Lead concentrations once exceeded the state and federal air quality standards by a wide margin but have not exceeded state or federal air quality standards at any regular monitoring station since 1982. Health effects associated with lead include neurological impairments, mental retardation, and behavioral disorders. At low levels, lead can damage the nervous systems of fetuses and result in lowered IQ levels in children. (EPA 2023). Though special monitoring sites immediately downwind of lead sources recorded very localized violations of the state standard in 1994, no violations have been recorded at these stations since 1996. Unleaded gasoline has greatly contributed to the reduction in lead emissions in the Basin. Since the proposed Project will not involve leaded gasoline, or other sources of lead emissions, this criteria pollutant is not expected to be a factor with Project implementation.
  
- **Reactive Organic Gases/Volatile Organic Compounds (ROG/VOC)** – It should be noted that there are no state or federal ambient air quality standards for VOCs because they are not classified as criteria pollutants. VOCs are regulated; however, a reduction in VOC emissions reduces certain chemical reactions, which contribute to the formation of ozone. VOCs are also transformed into organic aerosols in the atmosphere, contributing to higher PM<sub>10</sub> and lower visibility levels. Although health-based standards have not been established for VOCs, health effects can occur from exposures to high concentrations of VOC because of interference with oxygen uptake. In general, ambient VOC concentrations in the atmosphere, even at low concentrations, are suspected to cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis. Some hydrocarbon components classified as VOC emissions are thought or known to be hazardous. Benzene, for example, is a hydrocarbon component of VOC emissions that is known to be a human carcinogen. (SCAQMD 2005, p. 1-5).

#### *Toxic Air Contaminants*

Toxic air contaminants (TACs) are chemicals generally referred to as “non-criteria” air pollutants which may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. TACs are generally present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at very low concentrations. For those TACs that cause cancer, there is no concentration that does not present some low-level risk. In other words, there is no threshold below which adverse health impacts are not expected to occur. This contrasts with the criteria pollutants for which acceptable levels of exposure can be determined, and for which the state and federal governments have set ambient air quality standards. The majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important being PM from diesel-fueled engines, known as diesel particulate matter (DPM). In addition to DPM, benzene and 1,3-butadiene are also significant contributors to overall ambient public health risk in California. (SCAQMD 2005, pp. 1-6 – 1-7).

SCAQMD has conducted a detailed TAC emission inventory, air sampling, and dispersion modeling study called the “Multiple Air Toxics Exposure Study in the South Coast Air SoCAB” (MATES-II, SCAQMD 2000), MATES-III (SCAQMD 2008), MATES-IV (SCAQMD 2014), and MATES-V (SCAQMD 2021) (collectively, “MATES Studies”).



The MATES Studies provided information on the importance of various TACs in terms of their relative health risks, as well as their spatial distribution across the Basin. The MATES-V information can be used to characterize the “background” health risks from both regional and local TAC emission sources based on the available toxics emission inventory for the year 2018 and a comprehensive modeling effort.

As in previous MATES iterations, DPM is the largest contributor to overall air toxics cancer risk. However, the average levels of DPM in MATES-V are 53 percent lower at the 10 monitoring sites compared to MATES-IV and 86 percent lower since MATES-II based on monitored data. Based on other SCAQMD analyses of projected DPM emissions in future years, significant decreases in DPM health impacts are expected within the next 5-10 years. These reductions reflect recent and continued efforts by the SCAQMD, the California Air Resources Board (CARB), and U.S. Environmental Protection Agency (EPA) that reduce DPM emissions, especially from mobile sources. (SCAQMD 2021, p. ES-6).

*Sources and Effects of Criteria Air Pollutants*

Sources and typical effects of criteria pollutants are summarized in **Table 5.2-B, Primary Sources and Effects of Criteria Pollutants** below.

The correlation between project-specific emissions and potential health impacts is complex and the SCAQMD has determined the attempting to quantify health risks from relatively small projects (i.e., very large regional projects)) would not be appropriate because it may be misleading and unreliable for various reasons including modeling limitations as well as where in the atmosphere the air pollutants interact and form. (SCAQMD 2015, pp. 9-15). To date, SCAQMD has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health. However, if a project in the Basin exceeds the SCAQMD regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standard(s) are met in the Basin.

**Table 5.2-B, Primary Sources and Effects of Criteria Pollutants**

Pollutant	Primary Effects
Ozone (O3)	Respiratory Symptoms Worsening of lung diseases leading to premature death Damage to lung tissue Crop, forest and ecosystem damage Damage to a variety of materials, including rubber, plastics, fabrics, paint and metals.
PM 2.5 (particulate matter less than 2.5 microns in aerodynamic diameter)	Premature death Hospitalization for worsening of cardiovascular disease Hospitalization for respiratory disease Asthma-related emergency room visits Increased symptoms, increased inhaler usage
PM 10 (particulate matter less than 10 microns in aerodynamic diameter)	Premature death & hospitalization, primarily for worsening of respiratory disease Reduced visibility and material soiling
Nitrogen Oxides (NOX)	Lung irritation Enhanced allergic responses

**Table 5.2-B, Primary Sources and Effects of Criteria Pollutants**

Pollutant	Primary Effects
Carbon monoxide (CO)	Chest pain in patients with heart disease Headache Light-headedness Reduced mental alertness
Sulfur dioxide (SO <sub>2</sub> )	Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits
Lead	Impaired mental functioning in children Learning disabilities in children Brain and kidney damage
Hydrogen Sulfide (H <sub>2</sub> S)	Nuisance odor (rotten egg smell) At high concentrations: headache & breathing difficulties
Sulfate	Same as PM-2.5, particularly worsening of asthma and other lung diseases Reduces visibility
Sulfate	Same as PM-2.5, particularly worsening of asthma and other lung diseases Reduces visibility
Vinyl Chloride	Central nervous system effects, such as dizziness, drowsiness & headaches Long-term exposure: liver damage & liver cancer
Visibility Reducing Particles	Reduced airport safety, scenic enjoyment, road safety, and discourages tourism
Toxic Air Contaminants  About 200 chemicals have been listed as toxic air contaminants	Cancer Reproductive and development effects Neurological effects
Source: <a href="https://ww2.arb.ca.gov/resources/common-air-pollutants">https://ww2.arb.ca.gov/resources/common-air-pollutants</a>	

*Monitored Air Quality*

The Project site is located within SCAQMD Source Receptor Area (SRA) 23. The most recently published data for SRA 23’s Riverside County Metropolitan station 1 is presented in **Table 5.2-C, Air Quality Monitoring Summary: 2019 - 2021 (SRA 23)** below. This data indicates that the baseline air quality conditions in the Project area include occasional events of unhealthful air. However, the frequency of smog alerts has dropped significantly in the last decade. Atmospheric concentrations of ozone and particulate matter are the two most significant air quality concerns in the Project area. Locally, no second stage alert (0.35 ppm/hour) has been called by SCAQMD in over twenty years. In fact, the last second stage alert was in Upland in 1988.

**Table 5.2-C, Air Quality Monitoring Summary: 2019-2021 (SRA 23)**

	Pollutant/Standard	Monitoring Year		
		2019	2020	2021
No. Days Exceeded	<b>Ozone (O<sub>3</sub>):</b>			
	California Standard:			
	1-Hour - 0.09 ppm	24	46	20
	8-hour - 0.07 ppm	59	81	57
	Federal Primary Standards:			
	8-hour 0.070 ppm	59	81	55
	Max 1-Hour Conc. (ppm)	0.123	0.143	0.117
	Max 8-Hour Conc. (ppm)	0.096	0.115	0.097
No. Days Exceeded	<b>Carbon Monoxide (CO):</b>			
	California Standard:			
	1-Hour - 20 ppm	0	0	0
	8-Hour - 9.0 ppm	0	0	0
	Federal Primary Standards:			
	1-Hour - 35 ppm	0	0	0
	8-Hour - 9.0 ppm	0	0	0
	Max 1-Hour Conc. (ppm)	1.5	1.9	2.1
	Max 8-Hour Conc. (ppm)	1.2	1.7	1.8
No. Days Exceeded	<b>Nitrogen Dioxide (NO<sub>2</sub>):</b>			
	California/Federal Standard:			
	1-Hour - 0.18 ppm (180 ppb)/ 0.10 ppm (100 ppb)	0	0	0
	Federal Standard:			
	Federal/State AAM (53.4 / 30 ppb)	13.5	13.6	14.3
	Max 1-Hour Conc. (ppb)	56.0	66.4	52.0
No. Days Exceeded	<b>Sulfur Dioxide (SO<sub>2</sub>):</b>			
	California Standards:			
	1-Hour - 0.25 ppm (250 ppb)	0	0	0
	Federal Primary Standards:			
	1-Hour - 0.075 ppm (75 ppb)	0	0	0
	Max. 1-Hour Conc. (ppb)	1.8	2.2	2.1
No. Days Exceeded	<b>Suspended Particulates (PM-10)</b>			
	California Standards:			
	24-Hour - 50 µg/m <sup>3</sup>	21	110	16
	Federal Primary Standards:			
	24-Hour - 150 µg/m <sup>3</sup>	0	0	0
	State AAM (20 µg/m <sup>3</sup> )	34.4	30	34.2
	Max. 24-Hour Conc. (µg/m <sup>3</sup> )	99	104	76
No. Days Exceeded	<b>Fine Particulates (PM 2.5):</b>			
	Federal Primary Standards:			
	24-Hour - 35 µg/m <sup>3</sup>	4	4	10
	Federal/State AAM (12µg/m <sup>3</sup> )	11.13	12.63	12.58
	Max. 24-Hour Conc. (µg/m <sup>3</sup> )	46.70	41	82.1
Source: SCAQMD 2023				
<b>Notes:</b>				
AAM=annual arithmetic mean; ppm = parts per million; ppb = parts per billion; µg/m <sup>3</sup> = micrograms/cubic meter.				



*Attainment Status*

The EPA has established NAAQS for the six criteria pollutants described in **Table 5.2-C** above, to protect human health, with an adequate margin of safety (EPA 2023). Likewise, CARB has developed statewide thresholds for each of the criteria pollutants. If the concentration of one or more criteria pollutants within a geographic area is found to exceed the established statewide or NAAQS threshold level for one of the criteria pollutants, the area is considered to be in nonattainment for that pollutant. (CARB 2023).

The proposed Project site is located in an area that is designated as nonattainment for PM-10 by the state, as well as nonattainment for ozone, and PM-2.5 under both the state and federal standards as reflected in **Table 5.2-D, Attainment Status** below. As a result, SCAQMD is required to develop an Air Quality Management Plan (AQMP) for the Basin to bring the area into attainment for all criteria pollutants.

**Table 5.2-D, Attainment Status**

Criteria Air Pollutant	Attainment Designation	
	State	Federal
Ozone (O <sub>3</sub> )	Nonattainment	---
8-Hour Ozone (O <sub>3</sub> )	---	Nonattainment
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen dioxide (NO <sub>2</sub> )	Attainment	Unclassified/Attainment
Sulfur dioxide (SO <sub>2</sub> )	Attainment	Unclassified/Attainment
PM-10	Nonattainment	Attainment
PM-2.5	Nonattainment	Nonattainment
Source: CARB 2023		

*Sensitive Receptors*

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the SCAQMD, may include children, the elderly, athletes, and people who are sick. Sensitive receptors include residential uses, school playgrounds, childcare facilities, athletic facilities, hospitals, retirement homes, and convalescent homes. (SCAQMD 2005, pp. 2-1 and G-5). The closest existing sensitive receptors to the Project site are residences adjacent to the north and east site boundary as well as residences across Streeter Avenue, approximately 90 feet (27 meters) west of the Project site. (WEBB-A, p. 8).

**5.2.2 Related Regulations**

The Federal and State Ambient Air Quality Standards (AAQS) establish the context for the local air quality management plans (AQMP) and for determination of the significance of a project's contribution to local or regional pollutant concentrations. Federal and State AAQS are presented in **Table 5.2-C** above. The AAQS represent the level of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness, and persons engaged in strenuous work or exercise, all referred

to as “sensitive receptors.” As stated above, SCAQMD defines a “sensitive receptor” as a land use or facility such as schools, childcare centers, athletic facilities, playgrounds, retirement homes, and convalescent homes. (SCAQMD 1993, p. 1-2).

## **Federal Regulations**

### *Clean Air Act (CAA)*

The EPA is the lead Federal Agency charged with the implementation and enforcement of the Clean Air Act (CAA). As part of this effort, the EPA is responsible for the establishment of national ambient air quality standards (referred to herein as the “Federal Standards” or NAAQS). They are designed to protect those sensitive receptors most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

The CAA (and its subsequent amendments) requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The CAA Amendments dictate that states containing areas violating the NAAQS must revise their SIPs to include extra control measures to reduce air pollution. California’s SIP includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The SIP is periodically modified to reflect the latest emissions inventories, plans and rules and regulations of the various agencies with jurisdiction over the state’s air basins. The EPA has the responsibility to review all SIPs to determine if they conform to the requirements of the CAA.

The 1977 federal CAA Amendments required the EPA to identify national emissions standards for hazardous air pollutants (HAPs) to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 federal CAA Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

## **State Regulations**

### *California Environmental Protection Agency (CalEPA)*

The mission of the California Environmental Protection Agency (CalEPA) is to restore, protect and enhance the environment, to ensure public health, environmental quality, and economic vitality. This is accomplished by developing, implementing, and enforcing environmental laws that regulate air, water and soil quality, pesticide use and waste recycling and reduction. Relevant to air quality, the CalEPA consists of the CARB and the Office Environmental Health Hazard Assessment (OEHHA).

In 2012, the Legislature passed Senate Bill (SB) 535, which targets disadvantaged communities in California for investment of proceeds from the State’s cap-and-trade program to improve public health, quality of life, and economic opportunity in California’s most burdened communities, while also reducing pollution. SB 535 directed that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The legislation gave CalEPA responsibility for identifying those communities. In 2016, the Legislature passed Assembly Bill (AB) 1550, which now requires that 25 percent of proceeds from the fund be spent on projects located in disadvantaged communities. CalEPA has prepared a list of disadvantaged communities for the purpose of SB 535 and CalEnviroScreen is a general mapping tool developed by OEHHA to help identify California communities that are most affected by sources of pollution.

According to CalEnviroScreen 4.0, the census tract containing the Project site is not located within a disadvantaged community. However, the adjacent census tract on the west side of Streeter Avenue is. (OEHHA 2023)

With regard to the Community Air Protection Program (CAPP), each year CARB's governing board (Board) is required to consider selecting communities for participation in the CAPP per AB 617. Communities are selected for developing community air monitoring systems, emissions reduction programs, or both in order to improve air quality in their community. Over the first four years of the Program, the Board selected 17 communities where these focused actions are underway (CARB 2022a). The City of Riverside is not one of the selected communities and to date has not been nominated to participate in the CAPP. (CARB 2022b).

*California Air Resource Board (CARB)*

CARB is part of the California Environmental Protection Agency (CalEPA) and is responsible for overseeing the implementation of the California Clean Air Act (CCAA), meeting State requirements of the Federal Clean Air Act, and the establishment of State ambient air quality standards. Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as non-attainment. Attainment status is shown in **Table 5.2-D** above. CARB is also responsible for setting emission standards for vehicles sold in California and for other emission-sources including consumer goods and off-road equipment. In general, these vehicle emissions standards are more restrictive than those established at the federal level. CARB also established passenger vehicle fuel specifications, which became effective in March 1996.

California also regulates toxic air contaminants (TACs) through its air toxics program, mandated in Chapter 3.5 (Toxic Air Contaminants) of the Health and Safety Code (H&SC Sections 39660, et seq.) and Part 6 Air Toxics "Hot Spots" Information and Assessment (H&SC Sections 44300, et seq.). The CARB, working in conjunction with the OEHHA, identifies toxic air contaminants. Air toxic control measures may then be adopted to reduce ambient concentrations of the identified toxic air contaminant below a specific threshold based on its effects on health, or to the lowest concentration achievable through use of best available control technology for toxics (T-BACT). The program is administered by the CARB. Air quality control agencies, including the SCAQMD, must incorporate air toxic control measures into their regulatory programs or adopt equally stringent control measures as rules within six months of adoption by the CARB.

*California Energy Code (California Code of Regulations, Title 24)*

The California Energy Code (CCR Title 24, Part 6) was established in 1978 to reduce California's energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle. (CEC Standards).

These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings. (CEC 2022). They are designed to reduce wasteful, uneconomic, inefficient, or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality. The current 2022 Building Energy Efficiency Standards, which went into effect January 1, 2023, focuses on four key areas in new construction of homes and business by encouraging 1) electric heat pump technology and use, 2) establishing electric-ready requirements when natural gas is installed, 3) expanding solar photovoltaic (PV) system and battery storage standards, and



4) strengthening ventilation standards to improve indoor air quality. Specifically, the 2022 updates require all new homes be electric-ready. That means buildings with gas stoves have electrical panels and wiring to support a switch to electric stoves. Further advancements and cost reductions will continue to expand electric options for heating, cooking, laundering, and electric vehicle (EV) charging to meet all Californians' needs. (CEC 2022). The Project will be subject to the Title 24 Standards in effect at the time of building permits.

It is projected that the 2022 building efficiency standards will reduce 10 million metric tons of GHGs over 30 years. This reduction is equivalent to taking nearly 2.2 million cars off the road for a year. (CEC 2022).

California's Appliance Efficiency Regulations (CCR Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. (CEC Title 20).

#### *California Green Building Code*

Part 11 of the California Green Building Standards Code in Title 24 of the California Code of Regulations is also known as the CALGreen Code. (CBSC 2022) The development of the CALGreen Code is intended to: (1) cause a reduction in greenhouse gas emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The current cycle of the CALGreen Code was adopted in 2022 and became effective January 1, 2023.

The following are examples of some of the 2022 CALGreen Code requirements applicable to this Project:

#### ***Non-Residential***

*CALGreen Section 5.106.4: Bicycle parking. Comply with Sections 5.106.4.1 and 5.106.4.1.2 or meet local ordinance, whichever is stricter.*

- 5.106.4.1 Short-term bicycle parking. If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.
- 5.106.4.1.2 Long-term bicycle parking. For buildings with over 10 tenant-occupants, provide secure bicycle parking for 5 percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; and 3. Lockable, permanently anchored bicycle lockers. Note: Additional information on recommended bicycle accommodations may be obtained from Sacramento Area Bicycle Advocates.

*CALGreen Section 5.106.5.3: Construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with Section 5.106.5.3.1 and shall be provided in accordance with regulations in the California Building Code and the California Electrical Code.*

- 5.106.5.3.1 Electric Vehicle (EV) Capable spaces shall be provided in accordance with Table 5.106.5.3.1 (provided below) and the following requirements:

1. Raceways complying with the California Electrical Code and no less than 1-inch (25 mm) diameter shall be provide and shall originate at a service panel or subpanel(s) serving the area and shall terminate in close proximity to the proposed location of the EV Capable space and into a suitable listed cabinet, box, enclosure or equivalent. A common raceway may be used to serve multiple EV capable spaces.
2. A service panel or subpanel(s) shall be provided with panel space and electrical load capacity dedicated 208/240 volt, 40-ampere minimum branch circuit for each EV capable space, with delivery of 30-ampere minimum to an installed Electrical Vehicle Supply Equipment (EVSE) at each Electric Vehicle Charging Station (EVCS)
3. The electrical system and any on-site distribution transformers shall have sufficient capacity to supply full rated amperage at each EV capable space.
4. The service panel or subpanel circuit directory shall identify the reserved overcurrent protective device space(s) as “EV CAPABLE.” The raceway termination location shall be permanently and visibly marked as “EV CAPABLE.”

CALGreen Code Table 5.106.5.3.1 shows the number of parking spaces required EV Capable Spaces and the number of EV Capable Spaces provided with EVSE. **Table 5.2-E, CALGreen Code Electric Vehicle Charging Space Calculation**, is reflected below.

**Table 5.2-E, CALGreen Code Electric Vehicle Charging Space Calculation**

Total Number of Actual Parking Spaces	Number of Required Capable Spaces	Number of EVCS
0-9	0	0
10-25	4	0
26-50	8	2
51-75	13	3
76-100	17	4
101-150	25	6
151-200	35	9
201 and over	20 percent of total <sup>1</sup>	25 percent of EV capable spaces <sup>1</sup>
Source: CBSC 2022		
<b>Notes:</b>		
1. Calculation for spaces shall be rounded up to the nearest whole number.		

*CALGreen Section 5.106.5.4: EV charging: medium-duty and heavy-duty.* Construction shall comply with Section 5.106.5.4.1 to facilitate future installation of EVSE. Construction for warehouses, grocery stores and retail stores with planned off-street loading spaces shall also comply with Section 5.106.5.4.1 for future installation of medium- and heavy-duty EVSE.

- 5.106.5.4.1 EV charging readiness requirements for warehouses, grocery stores and retail stores with planned off-street loading spaces. In order to avoid future demolition when adding EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s) or subpanel(s) shall be installed at the time of construction in

accordance with the *California Electrical Code*. Construction plans and specifications shall include, but are not limited to, the following:

1. The transformer, main service equipment and subpanels shall meet the minimum power requirement in Table 5.106.5.4.1 to accommodate the dedicated branch circuits for the future installation of EVSE.
2. The construction documents shall indicate one or more location(s) convenient to the planned off-street loading space(s) reserved for medium- and heavy-duty ZEV charging cabinets and charging dispensers, and a pathway reserved for routing of conduit from the termination of the raceway(s) or busway(s) to the charging cabinet(s) and dispenser(s), as shown in Table 5.106.5.4.1.
3. Raceway(s) or busway(s) originating at a main service panel or a subpanel(s) serving the area where the potential future medium- and heavy-duty EVSE will be located and shall terminate in close proximity to the potential future location of the charging equipment for medium- and heavy-duty vehicles.
4. The raceway(s) or busway(s) shall be of sufficient size to carry the minimum additional service load to the future location of the charging for medium- and heavy-duty ZEVs as shown in Table 5.106.5.4.1.

CALGreen Code Table 5.106.5.3.1 shows the raceway conduit and panel power requirements for medium- and heavy-duty EVSE. **Table 5.2-F, CALGreen Code Requirements for Medium- and Heavy-Duty EVSE**, is reflected below.

**Table 5.2-F, CALGreen Code Requirements for Medium- and Heavy-Duty EVSE**

Building Type	Building Size (SQ. FT)	Number of Off-Street Loading Spaces	Additional Capacity Required (KVA) for Raceway & Busway and Transformer & Panel
Grocery	10,000 to 90,000	1 or 2	200
		3 or Greater	400
	Greater than 90,000	1 or Greater	400
Retail	10,000 to 135,000	1 or 2	200
		3 or Greater	400
	Greater than 135,000	1 or Greater	400
Warehouse	20,000 to 256,000	1 or 2	200
		3 or Greater	400
	Greater than 256,000	1 or Greater	400
Source: CBSC 2022			

*CALGreen Section 5.504.5.3: Filters.* In mechanically ventilated buildings, provide regularly occupied areas of the building with air filtration media for outside and return air that provides at least a Minimum Efficiency Reporting Value (MERV) of 13. MERV 13 filters shall be installed prior to occupancy, and



recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual.

**Residential**

*CALGreen Section 4.106.4: EV charging for new construction. New construction shall comply with Sections 4.106.4.1 or 4.106.4.2 to facilitate future installation and use of EV chargers. EVSE shall be installed in accordance with the California Electrical Code.*

- 4.106.4.1 New one- and two-family dwellings and townhouses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box, or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible, or concealed areas and spaces. The service panel and/or subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
- 4.106.4.2 New multifamily dwellings, hotels, and motels and new residential parking facilities. When parking is provided parking spaces for new multifamily dwellings, hotels and motels shall meet the requirements of Section 4.106.4.2.1 and 4.106.4.2.2. Calculations for spaces shall be rounded up to the nearest whole number. A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for purpose of complying with any applicable minimum parking space requirements established by a local jurisdiction. See Vehicle Code Section 22511.2 for further details.
  - 4.106.4.2.1 Multifamily development projects with less than 20 dwelling units; and hotels and motels with less than 20 sleeping units or guest rooms. The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.
    1. EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as “EV CAPABLE” in accordance with the *California Electrical Code*.
    2. EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.
  - 4.106.4.2.2 Multifamily development projects with 20 or more dwelling units, hotels, and motels with 20 or more sleeping units or guest rooms. The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.
    1. EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall

demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as “EV CAPABLE” in accordance with the *California Electrical Code*.

2. EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.
3. EV Chargers. Five (5) percent of the total number of parking spaces shall be equipped with Level 2 EVSE. Where common use parking is provided, at least one EV charger shall be located in the common use parking area and shall be available for use by all residents or guests.

When low power Level 2 EV charging receptacles or Level 2 EVSE are installed beyond the minimum required, an automatic load management system (ALMS) may be used to reduce the maximum required electrical capacity to each space served by the ALMS. The electrical system and any on-site distribution transformers shall have sufficient capacity to deliver at least 3.3 kW simultaneously to each EV charging station (EVCS) served by the ALMS. The branch circuit shall have a minimum capacity of 40 amperes and installed EVSE shall have a capacity of not less than 30 amperes. ALMS shall not be used to reduce the minimum required electrical capacity to the required EV capable spaces.

- 4.106.4.2.2.1 Electric vehicle charging stations (EVCS). Electric vehicle charging stations required by Section 4.106.4.2.2.1.2, Item 3, shall comply with Section 4.106.4.2.2.1.1.
- 4.106.4.2.2.1.1 Location. EVCS shall comply with at least one of the following options:
  1. The charging space shall be located adjacent to an accessible parking space meeting the requirements of the *California Building Code*, Chapter 11A, to allow use of the EV charger from the accessible parking space.
  2. The charging space shall be located on an accessible route, as defined in the *California Building Code*, Chapter 2, to the building.

## Regional Regulations

### *South Coast Air Quality Management District*

The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the Basin, which covers an area of 6,745 square miles. The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The SCAQMD has developed a variety of plans and

rules aiming to improve air quality within the Basin, as discussed below. (SCAQMD 2005, pp. 1-11 – 1-12).

*Air Quality Management Plan*

All areas designated as non-attainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures.

The SCAQMD adopted an updated AQMP in December 2022. The 2022 AQMP builds upon measures already in place from previous AQMPs to meet various ozone and PM-2.5 standards. It includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO<sub>x</sub> technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard of 70 parts per billion (ppb). (SCAQMD 2022, p. ES-2).

The 2022 AQMP includes a total of 49 control measures: 31 control measures target stationary sources and are categorized into four groups (NO<sub>x</sub> Control Measures, Co-Benefits from Climate and Energy Programs, Limited Strategic VOC Measures and Other Measures; and the remaining 18 control measures target mobile sources and are facility-based mobile source measures, emission reductions from incentive programs, and partnerships with local, State, federal, and international entities. (SCAQMD 2022, pp. ES-7 – ES-8).

The NO<sub>x</sub> measures are further grouped by residential, commercial, and large industrial combustion. Many control measures focus on widespread deployment of zero emission (ZE) and low NO<sub>x</sub> technologies through a combination of regulatory approaches and incentives and will require technology assessments to better understand where and when ZE and low NO<sub>x</sub> technologies can be implemented. (SCAQMD 2022, p. ES-7).

The residential and commercial measures are frequently referred to as “building measures,” which are in line with California’s aggressive climate goals to reduce greenhouse gases (GHG) emissions across various sectors. State climate actions, such as Title 24 energy code requirements and building electrification (e.g., Assembly Bill 3232), can also help reduce NO<sub>x</sub> emissions. In addition, CARB has proposed a statewide zero GHG emissions standard for residential and commercial building appliances, which would have criteria pollutant co-benefits. SCAQMD has also developed multiple building-related control measures to address emissions from residential and commercial combustion equipment for space heating, water heating, cooking, and others. (SCAQMD 2022, p. ES-7).

The AQMP utilizes the population and growth estimates compiled by the Southern California Association of Governments (SCAG) in their 2020 Regional Transportation Plan/Sustainable Community Strategy (2020 RTP/SCS), known as Connect SoCal. (SCAQMD 2022, p. 3-22).

SCAG’s population and employment projections are based on the City’s growth projections provided by cities, including from cities’ general plans (SCAG 2020, p. xiii). Should a project demonstrate compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed, and the project would not conflict with implementation of such a plan.



*Rule 220*

SCAQMD Rule 220 gives the Executive Officer the power to exempt a source from prohibitions outlined in SCAQMD Regulations IV and XI, Prohibitions and Source Specific Standards respectively, if they can make the finding that the installation of controls and/or process changes required to achieve compliance with the subject prohibitory rule will result in a net adverse impact on air quality. One of the conditions of the permits on exemptions issued under Rule 220 is that alternative controls and/or process changes which will result in the greatest practical net emission reduction be included for project operation. (Rule 220).

*Rule 402*

SCAQMD Rule 402 (Nuisance) prohibits the discharge of air containments in such quantities that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public but does not apply to odors emanating from agricultural operations necessary for growing of crops or the raising of fowl or animals. (Rule 402).

*Rule 403*

The Project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. The potential requirements include the application of water or chemical stabilizers to disturbed soils at least twice a day, covering all haul vehicles before transport of materials, restricting vehicle speeds on unpaved roads to 15 mph, and sweeping loose dirt from paved site access roadways used by construction vehicles. In addition, it is required to establish a vegetative ground cover on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph (Rule 403). In addition, projects that disturb 50 or more acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD.

*Rule 481*

SCAQMD Rule 481 applies to all spray painting and spray coating operations and equipment and requires all spray coating equipment to be (1) operated inside an approved control enclosure, (2) applied using high velocity-low pressure (HVLP), electrostatic and/or airless spray equipment, or (3) applied using which has an equal effectiveness to either of the two approved methods. (Rule 481).

*Rule 1108*

SCAQMD Rule 1108 applies to cutback and emulsified asphalt used at project sites. (Rule 1108).

*Rule 1113*

SCAQMD Rule 1113 governs the sale of architectural coatings and limits the volatile organic content (VOC) content in paints and paint solvents. This rule will dictate the VOC content of paints available for use during the construction of the buildings. (Rule 1113).

*Rule 1143*

SCAQMD Rule 1143 aims to reduce emissions of VOCs from the use, storage, and disposal of consumer paint thinners and multi-purpose solvents commonly used in thinning of coating materials, cleaning of coating application equipment and other solvent cleaning operations by limiting their VOC content. Additionally, Rule 1143 requires several best management practices to reduce VOCs during use and application of paint thinners and other solvents. For example, this Rule requires containers to be closed

when not in use. This Rule also establishes requirements for appropriate labelling and disclosure of contents for containers and storage areas of these corrosive, flammable substances. (Rule 1143).

*Rule 1186*

SCAQMD Rule 1186 is intended to reduce the amount of particulate matter entrained in the ambient air as a result of vehicular traffic on paved and unpaved public roads, and at livestock operations. This includes requirements for local governments that contract for street sweeping services to utilize only certified street sweeping equipment. (Rule 1186).

*Rule 1303*

SCAQMD Rule 1303 prohibits issuance of permits for any relocation or for any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia unless a best available control technology (BACT) is employed for the new or relocated source as specified by the Clean Air Act or other regulations. (Rule 1303).

**Local Regulations**

*City of Riverside 2025 General Plan*

The City of Riverside General plan contains objectives and policies that are considered applicable to the proposed Project, as identified below:

***Air Quality Element***

Policy AQ-1.3	Separate, buffer and protect sensitive receptors from significant sources of pollution to the greatest extent possible.
Policy AQ-1.5	Encourage infill development projects within urbanized areas, which include job centers and transportation nodes.
Policy AQ-1.6	Provide a mechanism to create opportunities for mixed-use development that allows the integration of retail, office, institutional and residential uses for the purpose of reducing costs of infrastructure construction and maximizing the use of land.
Policy AQ-1.7	Support appropriate planned residential developments and infill housing, which reduce vehicle trips.
Policy AQ-1.12	Support mixed-use land use patterns but avoid placing residential and other sensitive receptors in close proximity to businesses that emit toxic air contaminants to the greatest extent possible. Encourage community centers that promote community self-sufficiency and containment and discourage automobile dependency.
Policy AQ-1.16	Design safe and efficient vehicular access to commercial land uses from arterial streets to ensure efficient vehicular ingress and egress.
Policy AQ-1.19	Require future commercial areas to foster pedestrian circulation through the land use entitlement process and/or business regulation.
Objective AQ-2	Reduce air pollution by reducing emissions from mobile sources.

Policy AQ-2.22	Monitor traffic and congestion to determine when and where the City needs new transportation facilities to achieve increased mobility efficiency.
Policy AQ-2.25	Support the development of alternative fuel infrastructure that is publicly accessible.
Objective AQ-4	Reduce particulate matter, as defined by the Environmental Protection Agency, as either airborne photochemical precipitates or windborne dust.
Policy AQ-4.2	Reduce particulate matter from agriculture (e.g., require use of clean nondiesel equipment and particulate traps), construction, demolition, debris hauling, street cleaning, utility maintenance, railroad rights-of-way and offroad vehicles to the extent possible as provided in SCAQMD Rule 403.
Policy AQ-5.7:	Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.

*City of Riverside 2025 General Plan EIR*

The following are applicable mitigation measures from the City of Riverside 2025 General Plan EIR that pertain to Air Quality (GP 2025 FEIR, p. 5.3-50-53).

**MM Air 1:** To mitigate for potential adverse impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available URBEMIS model, or other methods sanctioned by the SCAQMD. The analysis of construction-related air quality impacts shall be included in the development project's CEQA analysis, including recommended mitigation measures. Proposed mitigation measures may include extending the construction period as feasible in order to ensure air quality thresholds are not exceeded. The analysis shall address pollution levels near sensitive receptors and require mitigation to reduce emissions.

**MM Air 2:** To mitigate for potential adverse impacts resulting from construction activities, development projects must abide by the SCAQMD's Rule 403 concerning Best Management Practices for construction sites in order to reduce emissions during the construction phase. Measures may include:

- Development of a construction traffic management program that includes, but is not limited to, rerouting construction related traffic off congested streets, consolidating truck deliveries, and providing temporary dedicated turn lanes for movement of construction traffic to and from site;
- Sweep streets at the end of the day if visible soil material is carried onto adjacent paved public roads;
  - Wash off trucks and other equipment leaving the site;
  - Replace ground cover in disturbed areas immediately after construction;
  - Keep disturbed/loose soil moist at all times;
  - Suspend all grading activities when wind speeds exceed 25 miles per hour;
  - Enforce a 15-mile per hour speed limit on unpaved portions of the construction site.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.



*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPU I EIR that pertain to Air Quality.

*City of Riverside Municipal Code*

The following sections of the City's Municipal Code are applicable and pertain to Air Quality:

**Chapter 19.120.050 Development Standards.** This chapter identifies the development standards applicable to all development in the mixed-use zones.

**Chapter 16.26 – Electrification of New Buildings.** The City requires building electrification in certain newly constructed buildings. New building permits filed after January 6, 2023 for buildings three stories or less require electrification and buildings four or more stories are subject to this requirement in January 2026.

### **5.2.3 Comments Received in Response to the Initial Study/Notice of Preparation**

No comments were received regarding Air Quality in response to the Initial Study/Notice of Preparation (IS/NOP).

### **5.2.4 Thresholds of Significance**

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State CEQA Guidelines.

As identified in the Initial Study (Appendix A) and as outlined in Section 4.0 of this DEIR, implementation of the proposed Project will have a less than significant impact in the following area and this topic is not addressed in this DEIR:

- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Conflict with or obstruct implementation of the applicable air quality plan;
- 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; and
- Expose sensitive receptors to substantial pollutant concentrations.

### **5.2.5 Project Design Features**

The proposed Project will be designed and constructed to meet all applicable standards under CALGreen, Title 24, and Municipal Code 16.26 (Electrification of New Buildings), as described in *Section 5.2.2*, above. In particular, the Project will include the following design features:

- Rooftop and carport solar (PV) panels, consistent with the 2022 CALGreen code; and

- Residential appliances installed by the developer will be Energy Star-rated.

Where possible, these features have been quantified in the Project's air quality emissions estimates, as described in *Section 5.2.7*, below.

## 5.2.6 Methodology

The *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for the Arlington Mixed Use Development Project, City of Riverside, California* (WEBB-A) was prepared for the proposed Project by Albert A. Webb Associates dated October 2023 (included as Appendix B). The methodology used within the analysis is consistent with guidance prepared by the SCAQMD for quantification of emissions and evaluation of potential impacts related to air quality. As recommended by SCAQMD staff, the California Emissions Estimator Model (CalEEMod™) version 2022.1 program was used to quantify project-related emissions.

## 5.2.7 Environmental Impacts

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

The City is located within the Basin, which is under the jurisdiction of SCAQMD. SCAQMD prepares and regularly updates an AQMP to establish a comprehensive program to lead the Basin into compliance with all federal and state air quality standards, the most recent of which is the 2022 AQMP. (SCAQMD 2022).

As outlined in Section 5.2.2, above, the control measures and related emission reduction estimates included in the AQMP are based on emissions projections for a future development scenario derived from land use, population, and employment estimates defined in consultation with local governments. To do this, the AQMP utilizes the population and growth estimates compiled by the SCAG in their 2020 RTP/SCS (Connect SoCal). (SCAQMD 2022, pp. 4-51-4-55). As stated previously, SCAG's population and employment projections for the City are based on the City's growth projections (SCAG 2020, p. 70), which are outlined in the GP. Thus, since the 2022 AQMP is consistent with the 2020 RTP/SCS, the 2022 AQMP is also consistent with the growth assumptions in the GP. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed, and the project would not conflict with implementation of such a plan.

The Project will comply with all the 2020 RTP/SCS regional policies, as discussed in this Draft EIR's *Section 6.0 Consistency with Regional Plans*. However, per this Draft EIR's *Section 3.0 Project Description*, the Project includes a proposal to amend the existing General Plan Land Use designation of one parcel currently designated General Plan Land Use Designation of C – Commercial and a zoning designation of CG – Commercial General. The Project proposes a General Plan Amendment (GPA) to amend the General Plan Land Use designation from (C) – Commercial to (MU-V) – Mixed Use-Village, the rezone (RZ) proposes to change the Project site from (CG) – Commercial General to (MU-V) Mixed Use-Village. The Project proposes a residential density of 26.87 dwelling units per acre (du/ac)<sup>3</sup> which is consistent with the MU-V designation allowing a maximum of 30 du/ac. As discussed in *Section 5.9 - Population and Housing* of this Draft EIR, while the Project would result in a population increase of approximately 1,273 persons, this number represents growth that is less than one percent of the more

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3. 388 Dwelling Units ÷ 14.44 Residential Acres = 26.87 du/ac

conservative population projections analyzed by the Phase I General Plan Update (GPU) that projected 67,645 more persons than SCAG projections. SCAG RTP/SCS growth forecast indicates that in the year 2018 the jobs-to-housing ratio for Riverside County was 1.04:1, which by definition is considered job-rich. SCAG predicted that the City would remain a job-rich area with the projected 2045 population growth. As such, the resulting increase in population growth is not substantial compared to what was analyzed in the City's GPU, and the additional housing from this infill development would help the City fulfill its State housing requirements. Moreover, the Project on an individual basis does not have an impact as discussed in the following Threshold (*Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*"), and as such, the proposed Project would not conflict with the goals and objectives of the AQMP.

Additionally, the control measures contained within the 2022 AQMP will still apply to the Project site, and through this compliance, the Project will not obstruct implementation of the 2022 AQMP. Such control measures include, for example, taking credit for energy efficiency mandates (e.g., Title 24), and other programs that provide incentives, rebates, and loans for efficiency projects. Moreover, the mobile source control measures in the 2022 AQMP were based on a variety of control technologies that focus on accelerated retrofits or replacement of existing vehicles or equipment, acceleration of vehicle turnover through voluntary vehicle retirement programs, and greater use of cleaner fuels. The measures will also encourage greater deployment of zero-emission vehicles and equipment technologies such as plug-in hybrids, battery-electric, and fuel cells. (2022 AQMP, p. 4-21).

For these reasons, the proposed Project will not conflict with or obstruct implementation of the AQMP. Therefore, impacts are **less than significant**.

***Threshold: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?***

The portion of the Basin within which the proposed Project site is located is designated as a non-attainment area for PM-10 under State standards, and as a nonattainment area for ozone and PM-2.5 under both State and federal standards as reflected in **Table 5.2-D** above. SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same (SCAQMD 2003). Consequently, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. Project-specific air quality impacts have been analyzed, as described below.

Air quality impacts can be described in a short- and long-term perspective. Short-term impacts occur during site preparation and Project construction, whereas long-term impacts are associated with Project operation. A discussion of the Project's potential short-term construction-period and long-term operational-period air quality impacts is provided below.

### **Construction Emissions**

Construction emissions from Project construction were evaluated in WEBB-A using the CalEEMod version 2022.1. The default parameters within CalEEMod were used and these default values reflect a worst-case scenario, which means that Project emissions are expected to be equal to or less than the estimated emissions. In addition to the default values used, assumptions relevant to model inputs for short-term construction emission estimates used are described below. Construction activities



associated with the Project may result in emissions of SCAQMD criteria pollutants VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM-10, and PM-2.5. (WEBB-A, pp. 2).

Construction is anticipated to begin no earlier than July 2024. The Project will be developed in two overlapping phases. Phase 1 consists of demolition of the existing buildings and construction of: 20,320 square feet of supermarket and 5,000 square feet of retail building (modeled as a strip mall). Phase 2 consists of 388 multi-family dwelling units (modeled as low-rise apartments) and a recreational swimming pool.

Construction related emissions may result from construction activities involving: demolition grading, building construction, paving, and painting (architectural coatings), with the approximate construction schedules shown below in **Table 5.2-G, Phase 1 Estimated Construction Schedule** and **Table 5.2-H, Phase 2 Estimated Construction Schedule**. Working days are assumed to be 5 days per week.

**Table 5.2-G, Phase 1 Estimated Construction Schedule**

Construction Activity	Start Date	End Date	Total Working Days
Demolition	July 1, 2024	July 26, 2024	20
Grading	July 29, 2024	August 9, 2024	10
Building Construction	August 12, 2024	June 27, 2025	230
Paving	June 9, 2025	June 27, 2025	15
Architectural Coating	June 9, 2025	June 27, 2025	15

**Table 5.2-H, Phase 2 Estimated Construction Schedule**

Construction Activity	Start Date	End Date	Total Working Days
Grading	January 1, 2025	January 28, 2025	20
Building Construction	January 29, 2025	May 26, 2026	345
Architectural Coating	December 3, 2025	May 26, 2026	125
Paving	January 29, 2025	March 25, 2025	40

Each phase will use the following heavy-duty off-road construction equipment as shown in **Table 5.2-I, Construction Equipment** below, based on estimates from the Project applicant. The engine tier for each piece of equipment is calculated using CalEEMod defaults for the statewide fleet average emissions factors. Each piece of equipment is assumed to operate 8 hours per day. (WEBB-A, p. 3).

**Table 5.2-I, Construction Equipment**

Construction Activity	Off-Road Equipment	Unit Amount	
		Phase 1	Phase 2
Demolition	Crushing /Processing Equipment	1	0
	Concrete/Industrial Saws	1	0
	Excavators	3	0
	Rubber Tired Dozers	2	0
	Off Highway Truck <sup>1</sup>	1	0
Grading	Excavators	1	2
	Graders	1	2
	Rubber Tired Dozers	1	1

	Scrapers	0	4
	Tractors/Loaders/Backhoes	3	2
	Crushing /Processing Equipment	0	1
	Off-Highway Trucks <sup>1</sup>	1	1
Building Construction	Forklifts	3	3
	Tractors/Loaders/Backhoes	3	2
	Welders	1	2
Paving	Cement and Mortar Mixers	2	0
	Pavers	1	1
	Paving Equipment	2	1
	Rollers	2	1
	Tractors/Loaders/Backhoes	1	0
	Off Highway Truck <sup>1</sup>	1	1
Architectural Coatings	Air Compressors	1	1
<b>Note:</b>			
1. Off-Highway trucks used to represent water trucks, operating two hours per day.			

Other assumptions that were included in the calculations of construction emissions include the following (WEBB-A, p. 3-4):

- The existing buildings totaling 192,139 sf will be demolished during Phase 1. The existing parking lot may be demolished in either Phase 1 or Phase 2 and all debris material will be crushed on-site and reused as engineered fill for the basement area. Therefore, crushing/processing equipment was included in both Phase 1 demolition and Phase 2 grading activities.
- The Project site will balance, meaning no soil import or export will be required.
- Phase 1’s construction footprint includes off-site improvements to the frontage of Arlington Avenue, which include storm water, potable water, and sewer lines connections and roadway improvements approximately 22-foot wide along the Project frontage. Phase 2 includes off-site road improvements along the Project frontage of Streeter Avenue, which include water line, sewer line, and storm drain line connections and sidewalk and landscaping. In addition, Phase 2 off-site improvements include electrical connections to existing facilities. However, an additional circuit will be required to meet the Project’s estimated electric demand. This will require approximately 1.5 miles of off-site trenching (assumed to be two-foot wide) within Streeter Avenue, Central Avenue, and Hillside Avenue.
- To evaluate Project compliance with SCAQMD Rule 403 for fugitive dust control during grading, the Project utilized the option of watering the Project site three times daily which achieves a control efficiency of 74 percent for PM-10 and PM-2.5 emissions.
- To evaluate Project compliance with SCAQMD Rule 403 for fugitive dust control during the demolition phase, the Project utilized the option of watering the demolished area 2 times daily which achieves a control efficiency of 36 percent for PM-10 and PM-2.5 emissions.

As shown in **Table 5.2-J, Unmitigated Estimated Maximum Daily Construction Emissions** below, peak daily construction emissions from the Project will not exceed any SCAQMD criteria pollutant thresholds (WEBB-A, pp. 4).

**Table 5.2-J, Estimated Maximum Daily Construction Emissions**

Activity	Peak Daily Emissions (lb/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM-10	PM-2.5
<b>SCAQMD Daily Construction Thresholds</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
2024	36.90	35.40	74.40	0.09	10.10	3.13
2025 <sup>1</sup>	<b>41.20</b>	<b>58.00</b>	<b>122.00</b>	<b>0.13</b>	<b>11.10</b>	<b>4.64</b>
2026	30.70	11.10	41.20	0.03	5.96	1.61
Maximum	<b>41.20</b>	<b>58.00</b>	<b>122.00</b>	<b>0.13</b>	<b>11.10</b>	<b>4.64</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: WEBB-A, Table 2

**Notes:** Numbers are the maximum of summer or winter emissions in a given year and may not match due to rounding within the model.

1. The emissions shown for 2025 combine the results of two modeling runs, as applicable, and report the maximum peak daily construction emission in 2025.

As shown in the table above, Project’s construction-related emissions will be under the daily SCAQMD construction thresholds and impacts will be **less than significant**.

**Construction-Related Localized Air Quality Impacts**

Local significance thresholds (LSTs) were initially established in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. SCAQMD published its Final Localized Significance Threshold Methodology, which recommends that certain air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors. LSTs represent the maximum emissions from project sites that are not expected to result in an exceedance of the NAAQS or CAAQS. SCAQMD states that lead agencies can use the LSTs as another indicator of significance in air quality impact analyses. This analysis makes use of methodology included in SCAQMD’s Final Localized Significance Threshold Methodology. (WEBB-A, p. 6).

The Project is in SRA 23 for the LST. According to the LST methodology, only on-site emissions need to be analyzed. Emissions associated with vendor and worker trips are mobile source emissions that occur off-site. The emissions analyzed under the LST methodology are NO<sub>x</sub>, CO, PM-10, and PM-2.5. (WEBB-A, pp. 6-7).

SCAQMD has provided LST lookup tables to allow users to readily determine if the daily emissions for proposed construction or operational activities could result in significant localized air quality impacts for projects five acres or smaller. The LST thresholds are estimated using the maximum daily disturbed area (in acres) and the distance of the Project to the nearest sensitive receptors (in meters). Based on this SCAQMD guidance and the Project’s equipment list during grading (above), Phase 1 will disturb approximately 2.5 acres per day, and Phase 2 will disturb approximately 6.5 acres per day. Although disturbance in Phase 2 of the Project exceeded five acres per day, per SCAQMD, the LST threshold and tables can be used as a screening tool to determine if dispersion modeling would be necessary.



Therefore, the Project’s on-site emissions from CalEEMod and LST-Look-Up Tables for the five-acre site were utilized as a screening-level analysis for Phase 2. (WEBB-A, p. 6).

The LST are estimated using the maximum daily disturbed area (in acres) and the distance of the Project to the nearest sensitive receptors (in meters). The closest sensitive receptors are existing residential properties adjacent to the north and east of the Project site. The closest receptor distance on the LST look-up tables is 25 meters. According to LST methodology, projects with boundaries closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. Therefore, a receptor distance of 25 meters (85 feet) was used to ensure a conservative analysis. The results are shown for each phase in **Table 5.2-K, LST Results for Unmitigated Daily Construction Emissions** below.

**Table 5.2-K, LST Results for Unmitigated Daily Construction Emissions**

Pollutant	Peak Daily Emissions (lb/day)			
	NO <sub>x</sub>	CO	PM-10	PM-2.5
<b>2.5-Acre Disturbance Area</b>				
<b>LST for 2.5-acre site at 25 meters</b>	<b>187</b>	<b>999</b>	<b>8</b>	<b>5</b>
Phase 1-Demolition – 2024	<b>26.50</b>	<b>70.60</b>	<b>7.73</b>	<b>2.37</b>
Phase 1-Grading – 2024	19.00	19.60	2.71	1.69
Phase 1-Building Construction – 2024	7.37	10.50	0.34	0.32
<b>Maximum<sup>1</sup></b>	<b>26.50</b>	<b>70.60</b>	<b>7.73</b>	<b>2.37</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>5-Acre Disturbance Area</b>				
<b>LST for 5-acre site at 25 meters</b>	<b>270</b>	<b>1,577</b>	<b>13</b>	<b>8</b>
Phase 1-Building Construction – 2025	<b>6.86</b>	<b>10.50</b>	<b>0.29</b>	<b>0.26</b>
Phase 1-Paving – 2025	8.48	11.20	0.36	0.33
Phase 1-Architectural Coatings – 2025	1.18	1.52	0.04	0.03
Phase 2-Grading – 2025	<b>47.90</b>	<b>92.10</b>	<b>5.63</b>	<b>3.27</b>
Phase 2-Building Construction – 2025	7.10	10.20	0.28	0.26
Phase 2-Building Construction – 2026	6.71	10.20	0.24	0.22
Phase 2-Paving – 2025	4.41	5.73	0.20	0.18
Phase 2-Architectural Coatings – 2025	1.18	1.52	0.04	0.03
Phase 2-Architectural Coatings – 2026	1.14	1.51	0.03	0.03
<b>Maximum<sup>2</sup></b>	<b>54.76</b>	<b>102.60</b>	<b>5.92</b>	<b>3.27</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: WEBB-A, Table 5

**Notes:**

1. Maximum emissions are rounded and shown in bold.
2. Maximum emissions are the greater of either: 1) the sum of Phase 1 building construction and Phase 2 Grading in 2025; 2) the sum of Phase 1 building construction, Phase 2 building construction and Phase 2 paving in 2025; 3) the sum of Phase 1 building construction, Phase 1 paving, Phase 1 architectural

**Table 5.2-K, LST Results for Unmitigated Daily Construction Emissions**

Pollutant	Peak Daily Emissions (lb/day)			
	NO <sub>x</sub>	CO	PM-10	PM-2.5
coatings, and Phase 2 building construction in 2025; 4) the sum of Phase 2 building construction and Phase 2 architectural coatings in 2025; or 5) the sum of Phase 2 building construction and Phase 2 architectural coatings in 2026, because these activities overlap. Maximum emissions are rounded and shown in bold.				

**Operational Emissions**

Operational (long-term) emissions are evaluated at build-out of a project. The Project is assumed to be operational in 2026. Operational activities associated with the proposed Project may result in emissions of SCAQMD criteria pollutants VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM-10, and PM-2.5. Operational emissions may be expected from area source emissions, energy source emissions, and mobile source emissions. Mobile source emissions refer to on-road motor vehicle emissions generated from the Project’s traffic and based on the Project-specific Traffic Impact Analysis (TIA), which is included in Appendix F of the Draft EIR. Weekend residential trip rates were obtained from the Institute of Transportation Engineers (ITE) Manual, 11th Edition. CalEEMod defaults were utilized for pass-by and diverted trip types. The TIA’s internal capture trip reduction of approximately 22 percent for the residential and supermarket uses was not applied, further providing a conservative analysis. In addition, no reductions were taken for transit and pedestrian accessibility. (WEBB-A, p. 4-5).

Area source emissions from the Project include stationary combustion emissions of natural gas used for space and water heating (shown in a separate row as energy), yard and landscape maintenance, and an average building square footage to be repainted each year. CalEEMod computes area source emissions based upon default factors and land use assumptions. CalEEMod defaults were utilized with the exception of fireplaces, which are not proposed in residential uses.

Energy sources emissions from the Project are generated as a result of activities in buildings that consume energy in the form of natural gas and electricity. Per the City’s municipal code (Chapter 16.26), building electrification is required for the Project. Accordingly, CalEEMod mitigation measure E-15, which requires all electric development was incorporated as part of Project design. However, CalEEMod only quantifies reductions from the residential land use for this measure. Therefore, the natural gas emissions are overstated. Criteria pollutants are emitted during the generation of electricity, but this electricity generation typically takes place off-site at power plants. For this reason, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users and as such are not reported by CalEEMod. The Project’s design features listed above in Section 5.2.5 reduce electricity consumption and therefore do no change the Project’s criteria pollutant emissions estimates.

The Project’s operational emissions are shown in **Table 5.2-L, Unmitigated Estimated Daily Project Operation Emissions (Summer)** and **Table 5.2-M, Unmitigated Estimated Daily Project Operation Emissions (Winter)** below.

**Table 5.2-L, Unmitigated Estimated Daily Project Operation Emissions (Summer)**

Source	Peak Daily Emissions (lb/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>SCAQMD Daily Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Phase 1</b>						
Area	0.80	0.01	1.10	0.00	0.00	0.00
Energy	0.01	0.10	0.08	0.00	0.01	0.01
Mobile	12.20	12.40	114.00	0.28	24.10	6.25
<b>Phase 1 Total</b>	<b>13.01</b>	<b>12.51</b>	<b>115.18</b>	<b>0.28</b>	<b>24.11</b>	<b>6.26</b>
<b>Phase 2</b>						
Area	14.70	0.21	22.22	0.00	0.01	0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	10.60	9.51	87.90	0.22	19.10	4.95
<b>Phase 2 Total</b>	<b>25.30</b>	<b>9.72</b>	<b>110.00</b>	<b>0.22</b>	<b>19.11</b>	<b>4.96</b>
<b>Project Total</b>	<b>38.31</b>	<b>22.23</b>	<b>225.18</b>	<b>0.50</b>	<b>43.22</b>	<b>11.22</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Source: WEBB-A, Table 3						
<b>Note:</b> Emissions reported as zero are rounded and not necessarily equal to zero.						

**Table 5.2-M, Unmitigated Estimated Daily Project Operation Emissions (Winter)**

Source	Peak Daily Emissions (lb/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>SCAQMD Daily Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Phase 1</b>						
Area	0.62	0.00	0.00	0.00	0.00	0.00
Energy	0.01	0.10	0.08	0.00	0.01	0.01
Mobile	11.30	13.30	94.80	0.26	24.10	6.25
<b>Phase 1 Total</b>	<b>11.93</b>	<b>13.40</b>	<b>94.88</b>	<b>0.26</b>	<b>24.11</b>	<b>6.26</b>
<b>Phase 2</b>						
Area	12.70	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	9.88	10.20	74.10	0.20	19.10	4.95
<b>Phase 2 Total</b>	<b>22.60</b>	<b>10.20</b>	<b>74.10</b>	<b>0.20</b>	<b>19.10</b>	<b>4.95</b>
<b>Project Total</b>	<b>34.53</b>	<b>23.60</b>	<b>168.98</b>	<b>0.46</b>	<b>43.21</b>	<b>11.21</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Source: WEBB-A, Table 4						
<b>Note:</b> Emissions reported as zero are rounded and not necessarily equal to zero.						

Evaluation of the data presented on the above tables indicates that criteria pollutant emissions from operation of this Project will not exceed the SCAQMD regional daily thresholds for any criteria pollutant. Therefore, impacts related to the Project’s operational emissions are **less than significant**.

According to the LST methodology, LSTs only apply to the operational phase if a project includes stationary sources or attracts mobile sources that may spend long periods of time idling at the site, such



as warehouse/transfer facilities. The proposed Project does not include such uses. Therefore, due to the lack of stationary source emissions, no long-term LST analysis is needed. (WEBB-A, p. 7).

Based on the analysis summarized above, the proposed Project will 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 for construction emissions. Therefore, impacts are **less than significant**.

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

As discussed above, sensitive receptors include residential uses, school playgrounds, childcare facilities, athletic facilities, hospitals, retirement homes, and convalescent homes. The closest sensitive receptors are existing residential properties whose boundaries abut the north and eastern boundary of the Project site. (WEBB-A, p. 6).

As detailed above, the LST analysis completed for the Project determined that the Project will not expose sensitive receptors to substantial pollutant concentrations because the applicable pollutant emissions will not exceed the LST during construction and the Project does not contain uses that are subject to an operational LST analysis. (WEBB-A, pp. 6-7).

WEBB-A conducted an analysis to evaluate impacts to sensitive receptors regarding CO hot spots. A CO “hot spot” is a localized concentration of CO that is above the state or federal 1-hour or 8-hour AAQS. Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles. (WEBB-A, p. 8).

Based on the information presented below, a CO “hot spot” analysis is not needed to determine whether the addition of Project related traffic will contribute to an exceedance of either the state or federal AAQS for CO emissions in the Project area. (WEBB-A, p. 8).

The analysis prepared for CO attainment in the Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Basin. CO attainment was thoroughly analyzed as part of the SCAQMD’s 2003 Air Quality Management Plan (2003 AQMP) and the Revised 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 2003 AQMP, peak carbon monoxide concentrations reported in the 1992 CO Plan in the Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region’s unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans. (WEBB-A, p. 8).

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Blvd. and Imperial Highway (Lynwood); Wilshire Blvd. and Veteran Ave. (Westwood); Sunset Blvd. and Highland Ave. (Hollywood); and La Cienega Blvd. and Century Blvd. (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated in the 1992 CO Plan and subsequent 2003 AQMP was that at Wilshire Blvd. and Veteran Ave., which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority evaluated the Level of Service in the vicinity of the Wilshire Blvd./Veteran Ave. intersection and found it to be level E at peak morning traffic and Level F at peak afternoon traffic. The hot spot analysis was conducted at intersections subject to extremes in vehicle volumes and vehicle congestion and did not predict any violation of CO standards. Considering Project-related traffic in the General Plan horizon

year of 2045, the segment with the highest average daily trips would be approximately 75,000 on Arlington Avenue between California Ave and the Project driveway, which is lower than the values studied by SCAQMD. Therefore, it can reasonably be concluded that Project-related traffic would not have daily traffic volumes exceeding those at the intersections modeled in the 2003 AQMP, nor would there be any reason unique to the meteorology to conclude that intersections affected by the Project would yield higher CO concentrations if modeled in detail. Thus, the Project would not result in CO hot spots. (WEBB-A, p. 8).

Thus, the proposed Project will not expose sensitive receptors to substantial pollutant concentrations, Therefore, impacts are **less than significant**.

### **5.2.8 Proposed Mitigation Measures**

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). There are no mitigation measures required to reduce impacts to air quality since impacts are less than significant.

### **5.2.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

There are no mitigation measures required to reduce air quality impacts.

## 5.3 Cultural Resources

The focus of this section is to analyze potential impacts related to cultural resources. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics.

The Project was analyzed for cultural resources in the *Cultural Resources Technical Report for 5261 Arlington Avenue, Riverside, California*, prepared by Dudek dated June 2023 (DUDEK-A). A *Supplemental CHRIS Records Search Results* was prepared by Dudek dated October 2023 (DUDEK-B) which includes the off-site utility line. The Project in its entirety (including one parcel and offsite improvement areas) is referred to as “Project site,” whereas reference to the one parcel (APN 226-180-015) is referred to as “Project parcel.” (DUDEK-A, p.3). An *Adaptive Reuse Study* was prepared by Architects Orange dated July 13, 2023 (AO), supported by a *Structural Review* prepared by Innova Structural Design Group dated July 6, 2023. Additionally, a *Feasibility of Re-Tenancing the Former Sears Building at 5261 Arlington Ave, Riverside, CA with Retail or Self Storage Uses (Feasibility of Re-Tenancing Report)* was prepared by AXIOM Retail Advisors dated January 14, 2024 (AXIOM). These reports are attached as Appendix C of this Draft EIR.

### 5.3.1 Setting

The Project is located in a fully developed area surrounded by residential and commercial businesses within the City of Riverside, California.

#### Environmental Setting

The Project fully developed Project site is a part of California’s Peninsular Range geomorphic province, which is a prominent natural region that extends from the tip of the Baja California Peninsula to the Transverse Ranges (the San Gabriel and San Bernardino Mountains) and includes the Los Angeles Basin, offshore islands, and continental shelf. The eastern boundary is the Colorado Desert Geomorphic Province. The City is surrounded by a series of hills and small mountains. These hills and mountains are between the two dominant San Jacinto and Santa Ana mountain ranges. They include La Sierra/Norco Hills, Mount Rubidoux, Box Springs Mountains, and the many smaller ranges south of the City. (DUDEK-A, p. 19).

Two major waterways converge less than one-mile north of the Project vicinity: the Santa Ana River and Tequesquite Arroyo. The natural vegetation within the Project vicinity prior to European colonization would have consisted of annual and perennial herbs, such as various species of sand verbena, thorn mint, and yarrow, as well as annual grasses, shrubs, and trees such as goldenhead, maple, broom, and fir. The Project site is relatively flat with an average elevation of approximately 787 feet above mean sea level gently sloping to the northwest. (DUDEK-A, p. 19).

Soils in the Project site as mapped by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) consist of two series—Buchenau and Hanford. The majority of the Project site is mapped as Buchenau loam, slightly saline-alkali, 0 to 2 percent slopes (57.1 percent) within the northern portion of the Project site, and Hanford coarse sandy loam, 0 to 2 percent slopes (42.9 percent) within the southern portion. The Buchenau series is characterized by moderately well drained soils formed on alluvial fans derived from mixed sources. The Hanford series is characterized as very deep,



well drained soils formed in alluvium derived from granitic sources. Typical pedons for the Buchenau and Hanford series extend approximately 5 feet below ground surface. (DUDEK-A, p. 19).

A review of the USGS mineral resources online spatial data for geology indicates that existing development is underlain by Older Quaternary alluvium and marine deposits, generally dating to the Pleistocene geologic age. Terminal Pleistocene-era alluvial formations do have the potential to support the presence of buried archaeological resources. These soils are associated with the period of prehistoric human use and represent ongoing processes of development that have the potential to preserve cultural material in context. (DUDEK-A, p. 19).

As part of the Geotechnical Investigation prepared for the Project site, nine subsurface exploratory borings and three infiltration tests were conducted throughout the Project site. Based on the results of the subsurface exploratory borings it was determined that majority of the Project site is composed of undocumented artificial fill soils underlain by natural undisturbed alluvial fan deposits. On the western portion of the Project site, undocumented artificial fill was encountered. On the northern portion of the Project site old alluvial fan deposits were observed directly underlying artificial fill. On the southern portion of the Project site artificial fill underlain by young alluvial fan deposits underlain by older alluvial fan deposits were encountered. (DUDEK-A, pp. 20-21).

## **Prehistoric Setting**

### *Paleoindian Period (Pre-5500 BC)*

Evidence for Paleoindian (pre 5500 BC) occupation in the region is rare in the inland valley with only one possible find located at the shore of Lake Elsinore. Therefore, the discussion below begins with the Archaic Period (8000 BC – AD 500). (DUDEK-A, pp. 41-42).

### *Archaic Period (8000 BC – AD 500)*

The more than 2,500-year overlap between the presumed age of Paleoindian occupations and the Archaic period highlights the difficulty in defining cultural chronology in Southern California. The Archaic pattern is the earliest local socioeconomic adaptation in the region, which has also been termed the Millingstone Horizon. The Archaic pattern is relatively easy to define with assemblages that consist primarily of processing tools, such as millingstones, handstones, battered cobbles, heavy crude scrapers, incipient flake-based tools, and cobble-core reduction. These assemblages occur in all environments across the region with little variability in tool composition. Low assemblage variability over time and space among Archaic sites has been equated with cultural conservatism. (DUDEK-A, p. 42)

### *Late Prehistoric Period (AD 500 to 1769)*

The addition of arrow points and ceramics, as well as the widespread use of bedrock mortars is an indication of the Late Prehistoric Period. The fundamental Late Prehistoric assemblage is remarkably similar to the Archaic pattern but includes arrow points and large quantities of fine debitage from producing arrow points, ceramics, and cremations. The appearance of mortars and pestles is difficult to place in time because most mortars are on bedrock surfaces. Ethnohistoric intensive acorn economy extends as far back as AD 500. However, there is no substantial evidence that reliance on acorns, and the accompanying use of mortars and pestles, occurred before AD 1400. Millingstones and handstones persisted in higher frequencies than mortars and pestles until the last 500 years; even then, weighing the economic significance of millingstone-handstone versus mortar-pestle technology is tenuous due to incomplete information on archaeological assemblages. (DUDEK-A, p. 43).

## Historic Setting

California's state history is divided into three periods: the Spanish Period (1769–1821), Mexican Period (1821–1846), and American Period (1846–present) (DUDEK-A, p. 47).

### *Spanish Period (1769–1821)*

Spanish explorers made sailing expeditions along the coast of southern California between the mid-1500s and mid-1700s. In 1542, Catalina Island, San Pedro, and Santa Monica bays were first discovered and named by the Spanish. Approximately 200 years later Spain began the colonization and inland exploration of Alta California. Therefore, in the mid-1700 Spain and the Franciscan Order founded a series missions (religious centers) along the California coast. (DUDEK-A, pp. 47-48).

### *Mexican Period (1821–1846)*

In 1821, New Spain (Mexico and the California territory) won independence from Spain. Which resulted in the Mexican legislative body in California to end isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants. Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts which resulted in ranchos. Southern California was home to landowners largely focused on cattle industry so devoted large tracts to grazing. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities. (DUDEK-A, p. 48).

### *American Period (1846 – Present)*

War in 1846 between Mexico and the United States (Mexican-American War) ended with the Treaty of Guadalupe Hidalgo in 1848, ushering California into its American Period. Following the Treaty of Guadalupe Hidalgo and subsequently, the admission of California as a state in 1850 with the Compromise of 1850. Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848, and with the influx of people seeking gold, cattle were no longer desired for just their hides, but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom. Cattle were at first driven along major trails or roads such as the Gila Trail or Southern Overland Trail, then were transported by trains when available. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity. (DUDEK-A, p. 49).

### *Development of Riverside*

In March of 1870, John Wesley North issued a circular entitled "A Colony for California" to promote the idea of founding an agriculture-based colony in California. By the end of the year, present-day Riverside was surveyed and platted with 10-acre parcels and a one-square-mile townsite. The community was originally called "Yurupa" but the name was changed to "Riverside" in December of 1870. The town grew quickly after 1870, reaching over 1,000 residents in its first decade. Between 1880 and 1890, the City's population grew from approximately 1,350 to 4,600 residents and grew from its original one-square-mile town center to nearly 56 square miles by 1883. In 1883, the City of Riverside was incorporated. (DUDEK-A, p. 50).

The citrus industry increased dramatically during the 1880s, with the promotion of the area emphasizing the potential profitability of agriculture. Two navel orange trees from Brazil's Bahia Province were brought into the Riverside colony. These parent trees produced sweet-tasting seedless fruits, sparking the interest of local farmers, and becoming so popular that the fruits from these trees eventually became known as "Riverside Navel." The fruit's popularity helped establish Riverside as a national leader in cultivating oranges and within Riverside created a new economic class: the "orchard aristocrats." (DUDEK-A, p. 50).

In October 1870 work began to construct the Upper Riverside Canal which was followed by the second canal being constructed in 1878 and finally the third canal was built and named the Gage canal in 1888. The Gage canal provided stable water supply which bolstered the booming citrus industry in Riverside. This rapid growth of such a vibrant citrus industry led to Riverside becoming the wealthiest city per capita in the United States by 1895. A blossoming citrus industry strongly influenced the advent of the railroad in Southern California. With the combination of rail transportation, the packing industry and cold storage facilities, Riverside was able to yield over one-half million boxes of oranges in 1890. (DUDEK-A, pp. 50-51).

At the end of the nineteenth century, counties were established, and the area today known as Riverside County was divided between Los Angeles County and San Diego County. In 1917, the U.S. War Department began building up its strength in anticipation of involvement in World War I and announced plans for several new military bases. A group of local Riverside business owners and investors received approval to construct the Alessandro Flying Training Field which later would be known as March Field and later renamed to March Air Force Base (MARB). MARB became a major training installation of the U.S. Army Air Forces. (DUDEK-A, p. 51).

After World War II, Riverside diversified its economy, developing a significant manufacturing sector. Consisting mostly of light industry, the manufacturing sector generated a range of products, including aircraft components, automotive parts, gas cylinders, electronic equipment, food products, and medical devices. As the county seat and largest city in the region, Riverside also houses numerous legal, accounting, brokerage, architectural, engineering, and technology firms, as well as banking institutions. The City of Riverside, which had not expanded since its original limits were established in 1883, began annexing new areas to the city in 1954. (DUDEK-A, p. 51).

In 1947, a group of citrus growers and Riverside community organizers lobbied the University of California (UC) Regents to establish a liberal arts college at the UC Citrus Experimentation Station. As a result, the University of California Riverside campus opened in 1954 and was added to the UC system in 1959. (DUDEK-A, p. 51).

New highway development also marked the post-war years. Prior to World War II, U.S. Route 395, and State Routes 60 and 18 (SR-60 and SR-18, respectively) were the only highways through Riverside. In 1957, U.S. 395 was part of an interstate improvement project and became Interstate 215, and the Riverside Freeway (CA Route 91) was added. (DUDEK-A, pp. 51-52).

During the post-World War II era, shifts in commercial development occurred due to automobile culture and sprawling residential development. Downtown centers became deserted as the focus moved to shopping centers to serve sprawl. Companies in Riverside that developed residential tracts also developed early shopping centers, in the 1950s. Large department stores were developed away from the downtown area to be closer to residential areas. Riverside had branches of national department store



chains including J. C. Penny, Montgomery Ward, and Sears, Roebuck, and Company that accommodated shoppers in residential areas. (DUDEK-A, p. 52).

#### *History of the Project site*

Aerial images show the Project site was primarily citrus orchards and farmland between 1931 and 1963, with small residences on site. The residences on site were demolished to make way for the construction of a Mid-Century Modern department store designed by architect Charles Luckman. In 1963, groundbreaking ceremonies for the subject property, the Sears department store building, took place with special guests including building's architect, Charles Luckman, Riverside store manager T.C. Hujar, Sears California zone manager H.E. Rademacher, and Mayor Dales of Riverside in attendance. The project would include a 184,754 square-foot department store and 24,294-square-foot auto service station accommodating 24 cars for service and 1,722 parking spaces. On May 6, 1964, Sears opened its new department store at 5261 Arlington Avenue, moving its storefront from its former downtown Riverside location. (DUDEK-A, p. 52).

The period after World War II until the 1970s was one of expansion for the Sears department store chain. The Project site is typical of post-World War II Sears stores and features a large, functional, windowless, free-standing building with twelve entrances, surrounded by a generous parking lot on all sides. All incoming and outgoing truck traffic was managed via a large ramp leading directly to the building's basement level, located at the north elevation of the department store. The Sears department store building in Riverside included an automobile service center. Building materials included concrete, brick, stone, stainless steel, aluminum, and glass. Sears stopped installing windows in their stores after the 1930s to control the lighting of merchandise from the interior. The functional design of the building was replicated after World War II for department stores. By the mid-1950s, the number of Sears stores in the United States had passed 700. By 1968, there were two Sears stores in the general area: 5261 Arlington Avenue in Riverside (Project site) and 100 Inland Center in San Bernardino. (DUDEK-A, p. 53).

Sears, Roebuck, and Company maintained ownership of the subject property until the mid-2010s. The department store building property has not undergone changes over time, with the exception of the replacement and removal of Sears signage. In the 1990s, the parking lot of the subject property functioned as a driving school. In 2019, Sears closed operations at the store, and the department store building remains vacant and unoccupied in 2022. (DUDEK-A, p. 53).

## **Architectural Context**

### *Architectural Style: Mid-Century Modern (1940-1975)*

The City of Riverside received a State of California Certified Local Government (CLG) grant for the period 2008-09 to prepare a Modernism Historic Context Statement. As a result, a general framework for the evaluation of mid-century buildings and tools for future intensive-level surveys was established. (MCS, p. 2). The *Cultural Resources Technical Report* prepared by Dudek, re-evaluated the Project site's eligibility under the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and City of Riverside Modernism Historic Context Statement.

Mid-Century Modern style is reflective of International and Bauhaus styles popular in Europe in the early twentieth century. The development of the Mid-Century Modern style in the United States was largely fostered by World War II. The United States became a manufacturing and industrial leader. Materials and aesthetics evolved to reflect modern innovations that dominated design and construction following the war. (DUDEK-A, pp. 55-56).

Mid-Century Modern design was embraced intellectually as a departure from the past, but it was economically appealing for its ability to be mass-produced with standardized, affordable, and replicable designs that could accommodate many programmatic needs and site requirements. Due to the need for a style that could meet the demand for mass construction of many property types, the Mid-Century Modern style was widely adopted, following World War II. Mass-produced Mid-Century Modern building materials like concrete, wood, steel, and glass made it the perfect style for growing cities. Examples of Mid-Century Modern style can be found throughout Riverside in commercial, civic, educational, and residential buildings. (DUDEK-A, pp. 55-56).

*Riverside Mid-Century Modern Style Commercial Characteristics*

- Simple geometric forms
- Post-and-beam construction
- Flat or low-pitched gabled roofs
- Flush mounted steel framed windows or large single-paned wood-framed windows
- Exterior staircases, decks, patios, and balconies
- Brick or stone often used as primary or accent material.

*Postwar Department Store Typology*

Automobile travel was prevalent after World War II in Southern California. Therefore, citizens were no longer restricted to downtown urban centers. As a result, development focused on new large stand-alone stores that provided ample parking on or off-site to appeal to motorists. Large major free-standing department store chains included the May Company, Sears, Macy's, JC Penney, and Bullock's. In the 1930s, Sears transitioned from a storefront with windows to a windowless design, which became a prominent feature of the chain. (DUDEK-A, pp. 56-57).

*Characteristics of the Department Store Typology*

- Large surface parking lots surrounding the building
- Disconnection from the street
- Windowless design
- Free-standing building
- One to two stories in height
- Boxlike massing
- Located outside urban centers
- Architectural styles including Mid-Century Modern, Vernacular Modern, and New Formalist

*Sears Building Architect: Charles Luckman*

In Riverside, Charles Luckman designed two post-war department store buildings in the area including the Sears department store and Auto Center (Project parcel) , and Broadway at the Tyler Mall. The Sears building is a standard design for post-war department stores, which includes a one-story building with large surface parking lots surrounding the building. The design of the Broadway is three stories, and its massing includes interwoven boxes. (DUDEK-A, p. 57).

*Sears Department Store*

The Sears department store building is a two-story Mid-Century Modern commercial building completed in 1964. The two-story department store is rectangular in plan with a flat roof. It is clad in concrete, brick, tile, and stone. The primary elevation faces Arlington Avenue to the south. As reflected in **Figure 5.3-1, Sears Building South and North Elevation**, the building features an asymmetrical massing, horizontal planes, and contrasting materials of stone and tile with rectangular roof overhangs that wrap

around the building. Palm trees are integrated into the overhangs located at the corners of the south elevation. Above the horizontal plane is textured tile and an outline of a Sears sign that has been removed. The south elevation features two entrances which have been boarded up with plywood. The entrances flank a rock wall and have no windows. The original Sears signage has been moved, replaced, and then removed. Dates of the alternations are unknown.

As reflected in **Figure 5.3-1**, the rear north facing elevation features a folded plate canopy supported by six posts and a breezeblock patio that wraps around to the west side elevation. The rear north facing elevation has an asymmetrical arrangement of two doors and no windows. At the left of the elevation is a sloping loading area with five cargo bays.

The west side elevation along Streeter Avenue is clad in brick and concrete. The west elevation is a flat plane with a recessed alcove. The horizontal canopy bisecting the elevation has trees integrated at the corners of the elevation. It features an asymmetrical fenestration of one entrance that has been boarded up and no windows. An awning on the west side elevation of the building extends to the Auto Center.

The east side elevation is clad in brick and has two entrances which have been covered with plywood. The entrances flank a rock wall with a horizontal canopy running along the elevation with rectangular canopies at the corners with palm trees incorporated into the design. Above the horizontal plane of the canopy is blank brickwork. (DUDEK-A, p. 35).

#### *Sears Auto Center*

The Sears Auto Center building also constructed in 1964, is located to the west of the Sears department store building. It has a rectangular plan, a flat roof, and is clad in metal sheet and brick. As reflected in **Figure 5.3-2, Sears Auto Center South and West Elevation**, the primary southern elevation features an asymmetrical arrangement of six garage doors next to a recessed alcove which has been boarded up. A horizontal plane extends along the southern elevation above the garage doors. The west side elevation features a rock-clad wall which forms a parapet with palm trees in front of it. The east side elevation has a recessed entrance which has been boarded up, with brick at the base of the elevation. The rear north facing elevation features a recessed alcove with a brick base, six bays of garage doors, and a horizontal canopy that extends along the elevation above. (DUDEK-A, p.35).

Paved parking lots with landscaped meridians surround both of the buildings. Palm trees line the perimeter of the buildings and property, lining the edge of the subject property along Arlington Avenue and Streeter Avenue. (DUDEK-A, p.35).



Primary (south) elevation,  
looking northwest



Rear (north) and side (west) elevations,  
view looking southeast



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Source: Dudek, 2022.

**Figure 5.3-1 Sears Building South and North Elevation**

Arlington Mixed Use



Primary (south) elevation of Auto Center,  
looking north



Side (west) and primary (south) elevations of Auto Center,  
looking northeast



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Source: Dudek, 2022.

**Figure 5.3-2 Sears Auto Center South and West Elevation**  
Arlington Mixed Use

## 5.3.2 Related Regulations

### Federal Regulations

#### *National Historic Preservation Act*

The National Historic Preservation Act of 1966 (NHPA) (54 U.S.C. 300101 et seq.) is legislation intended to preserve historical and archaeological sites in the United States of America. The act created the National Register of Historic Places, the list of National Historic Landmarks, and the State Historic Preservation Offices (SHPO). Among other things, the act requires federal agencies to evaluate the impact of all federally funded or permitted projects on historic properties (buildings, archaeological sites, etc.) through a process known as “Section 106 Review.” (NPS-A)

#### *National Register of Historic Places*

Developed in 1981 pursuant to Title 36 CFR Section 60, the NRHP provides an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment. It should be noted that the listing of private property on the NRHP does not prohibit any actions which may otherwise be taken by the property owner with respect to the property. The listing of sites in California to the National Register is initiated through an application submitted to the State Office of Historical Preservation. Applications deemed suitable for potential consideration are handled by the State Historic Preservation Officer. All NRHP listings for sites in California are also automatically added to the California Register of Historical Resources by the State of California. The listing of a site on the NRHP does not generally result in any specific physical protection. Among other things, however, it does create an additional level of CEQA (and NEPA, the National Environmental Protection Act) review to be satisfied prior to the approval of any discretionary action occurring that might adversely affect the resource. (NPS-B)

### State Regulations

#### *State Historic Preservation Office*

The State Historic Preservation Office (SHPO) is a state governmental function created per the NHPA, which called for the creation of a state agency to implement provisions of the law, including the preparation of a comprehensive historic preservation plan and a statewide survey of historical resources (SHPO-A). SHPO administers the National Register of Historic Places, the California Register of Historical Resources, the California Historical Landmarks, and the California Points of Historical Interest programs. The responsibilities of the SHPO include identifying, evaluating, and registering historic properties; ensuring compliance with federal and state regulatory obligations; encouraging the adoption of economic incentives programs designed to benefit property owners; encouraging economic revitalization by promoting a historic preservation ethic through preservation education and public awareness and, most significantly, by demonstrating leadership and stewardship for historic preservation in California. SHPO maintains the California Historical Resources Information System (CHRIS), which includes the statewide Historical Resources Inventory database. (SHPO-B).

#### *California Environmental Quality Act*

CEQA requires the lead agency to determine whether the proposed development project will have a significant effect on the environment. California Public Resource Code (PRC) Sections 21083.2 and 21084.1 and State *CEQA Guidelines* Section 15126.4 deal with the definitions of unique and non-unique archaeological resources and historical resources, respectively.



PRC Section 21083.2 directs the lead agency to determine whether the project may have a significant effect on unique archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources.

PRC Section 21084.1 and State *CEQA Guidelines* Section 15064.5(b)) identify that a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” An “historical resource” is any site listed or eligible for listing in the CRHR. The CRHR listing criteria are intended to examine whether the resource in question: (a) is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; (b) is associated with the lives of persons important in our past; (c) embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (d) has yielded, or may be likely to yield, information important in pre-history or history.

The term “historical resource” also includes any site described in a local register of historic resources or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1(q)). CEQA also applies to “unique archaeological resources.” PRC Section 21083.2(g) defines a “unique archaeological resource” as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Under PRC Section 21084.1 and State *CEQA Guidelines* Section 15064.5(a), all historical resources and unique archaeological resources, as defined by statute, are presumed to be historically or culturally significant for purposes of CEQA. The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption. A site or resource that does not meet the definition of “historical resource” or “unique archaeological resource” is not considered significant under CEQA and need not be analyzed further.

Per State *CEQA Guidelines* Section 15064.5(b)(1) and PRC Section 5020.1(q), a significant cultural impact results from a “substantial adverse change in the significance of an historical resource [including a unique archaeological resource]” due to the “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” In turn, the significance of a historical resource is materially impaired when a project:

1. Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
2. Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the

requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

3. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

#### *California Register of Historical Resources*

In 1992, the California legislature established the California Register of Historical Resources (CRHR) to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change. State law protects cultural resources by requiring evaluations of the significance of historical resources in CEQA documents as identified in PRC Section 5024.10 et seq. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a) of the State CEQA Guidelines. These criteria are similar to those used in federal law. The California Register of Historical Resources (CRHR) is maintained by the state Office of Historic Preservation. Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR, as are state historical landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. PRC Section 5020.1(j), defines the term "historical resource" to include but is not limited to "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California."

#### *Native American Heritage Commission*

The Native American Heritage Commission (NAHC), created in statute in 1976, is a nine-member body, appointed by the Governor, to identify and catalog cultural resources (i.e., places of special religious or social significance to Native Americans, and known graves and cemeteries of Native Americans on private lands) in California. The NAHC is also charged with ensuring California Native American tribes' accessibility to ancient Native American cultural resources on public lands (i.e. Sacred Lands File), overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the Native American Graves Protection and Repatriation Act (NAGPRA). (NAHC 2023).

#### *Human Remains*

According to Section 15064.5 of the State *CEQA Guidelines*, all human remains are assigned special importance and specific procedures are to be used when Native American remains are discovered. These procedures are discussed within Public Resources Code Section 5097.98 (PRC 5097.98). PRC 5097.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains.

#### *California Health & Safety Code (Sections 7050.5, 7051, and 7054)*

Sections 7050.5, 7051, and 7054 of the California Health & Safety Code collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resources Code), as well as the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures

to be implemented if Native American skeletal remains are discovered during construction of a project, treatment of the remains prior to, during and after evaluation, and reburial procedures. (HSC 7050.5, HSC 7051, and HSC 7054).

## Regional Regulations

There are no applicable regional regulations.

## Local Regulations

### *City of Riverside 2025 General Plan*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. HP-25, HP-27, HP-28):

### ***Historic Preservation Element***

Objective HP-1 To use historic preservation principles as an equal component in the planning and development process.

Policy HP-1.3 The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Policy HP-1.4 The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

Objective HP-5 To ensure compatibility between new development and existing cultural resources

Policy HP-5.1 The City shall use its design and plot plan review processes to encourage new construction to be compatible in scale and character with cultural resources and historic districts.

Policy HP-5.2 The City shall use its design and plot plan review processes to encourage the compatibility of street design, public improvements, and utility infrastructure with cultural resources and historic districts.

### *City of Riverside 2025 General Plan EIR*

There are no applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to Cultural Resources.

### *City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.

### *City of Riverside Phase I General Plan Update EIR*

There are no applicable mitigation measures from the GPUI EIR that pertain to Cultural Resources.

### *City of Riverside Municipal Code*

The following sections of the City's Municipal Code are applicable and pertain to cultural resources:

**Title 20 – Cultural Resources.** The purpose of this title is to promote the public health, safety and general welfare by providing for the identification, protection, enhancement, perpetuation and use of



improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic or artistic value in the City for the following reasons:

- To safeguard the City's heritage as embodied and reflected in such resources;
- To encourage public knowledge, understanding and appreciation of the City's past;
- To foster civic and neighborhood pride and a sense of identity based on the recognition and use of cultural resources;
- To promote the enjoyment and use of cultural resources appropriate for the education and recreation of the people of the City;
- To preserve diverse and harmonious architectural styles and design preferences reflecting phases of the City's history and to encourage complementary contemporary design and construction;
- To enhance property values and to increase economic and financial benefits to the City and its inhabitants;
- To protect and enhance the City's attraction to tourists and visitors, thereby stimulating business and industry;
- To identify as early as possible and resolve conflicts between the preservation of cultural resources and alternative land uses;
- To integrate the preservation of cultural resources and the extraction of relevant data from such resources into public and private land management and development processes;
- To conserve valuable material and energy resources by ongoing use and maintenance of the existing built environment.
- To implement the City's General Plan.
- To work in concert with the City's Zoning Code

### **5.3.3 Comments Received in Response to the Notice of Preparation**

No comments were received regarding Cultural Resources in response to the Notice of Preparation (NOP).

### **5.3.4 Thresholds of Significance**

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G ("Environmental Checklist") to the State *CEQA Guidelines*.

As identified in the Initial Study(Appendix A) prepared for this Project, and as outlined in Section 4.0 of this Draft EIR, implementation of the proposed Project will have a less than significant impact in the following area and this topic is not addressed in this DEIR:

- Disturb any human remains, including those interred outside of dedicated cemeteries.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5; and
- Cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5.

### 5.3.5 Project Design Features

The Project proposes to demolish the existing Sears Department Store and Sears Auto Center buildings. The proposed Project incorporates architectural features that give a nod to the Mid-Century Modern architectural style denoted by the two Sears structures to provide tribute to these structures. For instance, the double-volume standalone Clubhouse and Leasing Center of the proposed Project is proposed to be located at the core of the proposed development site, paying homage to the Mid-Century history by having a similar building placement as of the existing Sears building. The white and tan central massing of the Clubhouse and Leasing Center is highlighted at the entry by a striking, butterfly-style folded metal awning, a typical feature seen in Mid-Century architectural style and which is also found on the north façade of the existing Sears Building. This same butterfly-style metal awning will be repeated on the rear of the clubhouse, tying the existing and newly proposed architecture opening to the main pool recreation area of the Project.

The proposed apartments and townhomes will be designed based on a classical contemporary design, complementing the Clubhouse and Leasing Center, united through colors and enhanced materials. Each residential building is anchored by tower elements on each end, decorated in the enhanced siding used on the Clubhouse, and topped with varying moldings adding richness and texture.

The architecture of the commercial component is inspired on the Mid-Century architectural principles as the color and material palette will follow the neutral style of the existing Sears building, and the canopies at the main entry point will reflect similar language.

### 5.3.6 Methodology

A *Cultural Resources Technical Report (CRTR)* and a *Supplemental CHRIS Records Search Results* was prepared by Dudek date May 2023 (DUDEK-A) and October 2023 (DUDEK-B), respectively. Both reports are attached as Appendix C. The analysis herein is based upon the CRTR consisting of a records search; search of the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF); a pedestrian survey of the Project site by qualified architectural historians and a qualified archaeologist; building development and archival research; background research and historic map and aerial review; development of an appropriate prehistoric, ethnographic and historic context for the Project site; recordation and evaluation of one property over 45 years old located within the Project site; and management recommendations.(DUDEK-A, p, 3) The supplemental records search consisted of a CHRIS database records search, NAHC SLF search, background research, including a review of a geotechnical report. Due to the developed nature of the proposed off-site utility line, no exposed soils were present to observe. Thus, no supplemental pedestrian survey was conducted. (DUDEK-B, p. 5)

#### *Record Search and Literature Review*

On September 3, 2020 and in October 2023 the Eastern Information Center (EIC) completed a records search of the CHRIS database for the Project site plus a one half mile radius buffer. . The search

identified and collected the records for any previously recorded cultural resources and cultural resource studies and reviewed the following lists in an effort to identify resources meeting the respective criteria for the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. With respect to the built environment resources, the Built Environment Resources Database, California Inventory of Historical Resources (1976); Historical Maps; Local Inventories; and General Land Office and/or rancho plat maps were also reviewed. (DUDEK-A, p. 23, DUDEK-B, p. 1)

The 1938 Kirkman-Harriman Historical Map was also reviewed. Based on this map, the Project site located is approximately 15 miles southwest of the San Bernardino Mountains, approximately 10 miles northeast of the Santa Ana Mountains, and approximately 5 miles south of the Jurupa Hills and mapped 0.2-mile south of the historical route of the Santa Ana River. The proposed utility line terminates adjacent to the southern bank of the Santa Ana River's historical route. In this portion of the map, the Santa Ana River and the Project site are encircled by two roadways. Approximately 1.5 miles to the north of the Project parcel and 1.3 miles north of the proposed utility line is an unnamed northeast southwest trending road. To the south, the northeast southwest trending "Spanish Town Road" intersects the Project site. Within the land between the roadways are two (2) unnamed Native American villages. The villages are north of the Santa Ana River and equidistant from the Project site, approximately 4.5 miles to the east and west. It should be noted that this map is highly generalized due to scale and age and may be inaccurate with regards to distance and location of mapped features and was prepared based on review of historic documents and notes more than 100 years following secularization of the missions (in 1833). Although the map contains no specific primary references, it does matches the details documented by the Portolá expedition (circa 1769–1770). The map is a valuable representation of post-colonization mission history; however, it is limited to a specific period of Native American history and substantiation of the specific location and uses of the represented individual features should be verified by archaeological records and/or other primary documentation. (DUDEK-A, p. 26)

#### *Building Development and Archival Background Research*

A number of previously conducted studies and building development and archival research was also conducted. The *City of Riverside General Plan 2025 Program – Section 5.5 Cultural Resources*, *City of Riverside Historic Context Statement* and *City of Riverside Modernism Context Statement* documents were reviewed. Building development and archival research were conducted to establish a thorough and accurate historic context for the evaluations and to confirm the building development history. This included a review of Riverside County Building Permits, historical newspaper search, historical topographic maps, and historical aerial photographs. Part of this research also included requests for information from the Riverside Metropolitan Museum, Riverside Archives, and Riverside Historical Society. However, no information has been received to date from these entities. (DUDEK-A, pp. 28-32).

#### *Pedestrian Surveys*

An intensive level survey for historic built environment resources was conducted on May 11, 2022. The survey entailed walking only the exterior of the buildings on the subject property, documenting the property with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory. (DUDEK-A, p. 33).



An archaeological pedestrian survey of the Project site was conducted on February 7, 2023. The survey focused on identifying exposed ground surface within landscaped areas and edges of pavement. All available ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historical artifacts (e.g., metal, glass, ceramics, building materials). (DUDEK-A, p. 32).

#### *Native American Communications*

As part of the Phase I Cultural Resources Assessment, the Native American Heritage Commission (NAHC) was contacted on February 8, 2023 to request a Sacred Lands File (SLF) and a list of potentially interested Native American Tribes for the purposes of general Native American consultation under CEQA. (DUDEK-A, p. 27).

Pursuant to AB 52 and SB 18, the City notified Native American tribes in the area of the proposed Project. Rincon Band of Luiseño Indians was the only tribe to request consultation. Detailed responses and results of consultation are included in Section 5.13 - Tribal Cultural Resources of this Draft EIR.

#### *Adaptive Reuse Study, Structural Review and Feasibility of Re-Tenancing Report*

These documents were prepared to analyze the potential for maintaining the structures or portions of the structure for use of the proposed land uses.

### **5.3.7 Environmental Impacts**

#### ***Threshold: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?***

The Sears Department Store and Auto Center building were evaluated for historical significance and integrity in consideration of NRHP and CRHR listing and City Landmark designation criteria and integrity requirements. (DUDEK-A, p. 59).

#### *NRHP*

To qualify for the NHRP, a property must be evaluated within its historic context and represent a significant part of the history, architecture, archeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past. In order for a property to be listed in the NRHP or determined eligible for listing, it must be demonstrated to possess age/integrity and significance. To do so, the property must generally be at least 50 years old, look much as it did in the past, and be associated with important past events. (NPS, 7).

**Significance.** When evaluated within its historic context, a property must be shown to be significant for one or more of the following four Criteria for Evaluation:

- **Criterion A – Event.** Must be associated with events that have made a significant contribution to the broad patterns of our history; or
- **Criterion B – Person.** Must be associated with the lives of persons significant in our past; or
- **Criterion C – Design/Construction.** Must embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

- **Criterion D – Information Potential.** Must have yielded, or may be likely to yield, information important in prehistory or history.

Certain kinds of properties are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past fifty years. However, these properties can be eligible for listing if they meet specific requirements called Criteria Considerations, in addition to meeting one of the four Criterion listed above. (DUDEK-A, pp. 11-12)

- **Criteria Consideration A** – A religious property deriving primary significance from architectural or artistic distinction or historical importance;
- **Criteria Consideration B** – A building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event;
- **Criteria Consideration C** – A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life;
- **Criteria Consideration D** – A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events.
- **Criteria Consideration E** – A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived;
- **Criteria Consideration F** – A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- **Criteria Consideration G** – A property achieving significance within the past 50 years if it is of exceptional importance.

**Integrity.** Once the significance of a resource has been determined, it must then be assessed for integrity. Integrity is: 1) the ability of a property to illustrate history and; 2) possession of the physical features necessary to convey the aspect of history with which it is associated. The evaluation of integrity is grounded in an understanding of a property’s physical features and how they relate to the property’s significance. Historic properties either retain integrity (that is, convey their significance) or they do not. To retain integrity, a property will always possess several, and usually most, of the seven aspects of integrity as follows (DUDEK-A, p. 12):

- **Location** – the place where the historic property was constructed or the place where the historic event occurred.
- **Design** – the combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting** – the physical environment of a historic property.
- **Materials** – the physical elements that were combined or deposited during a particular period and in a particular pattern or configuration to form a historic property.
- **Workmanship** - the physical evidence of crafts of a particular culture or people during any given period in history or prehistory.
- **Feeling** – the property’s expression of the aesthetic or historic sense of a particular period.
- **Association** – the direct link between an important historic event or person and historic property.

### *CRHR*

The criteria for listing resources in the CRHR were developed to be in accordance with previously established criteria developed for listing in the NRHP. According to PRC Section 5024.1(c) (1–4), a resource is considered historically significant if it: 1) retains “substantial integrity” and; 2) meets at least one of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage. (NHRP Criterion 1)
2. Is associated with the lives of persons important to local, California or national history (NHRP Criterion 2)
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values. (NHRP Criterion 3)
4. Has yielded, or may be likely to yield, information important in prehistory or history. (NHRP Criterion 4)

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance. The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys. (DUDEK-A, p. 13).

### *Local Historic Resource*

Title 20 of the City Municipal Code provides for the “identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic or artistic value in the City.” The criteria to designate, modify the status of, or de-designate Landmarks, Structures or Resources of Merit and Historic Districts, and to modify or de-designate Neighborhood Conservation Areas, are set forth in their definitions in Chapter 20.50.

### **Landmark**

City of Riverside defines a “Landmark” as any improvement or natural feature that is an exceptional example of a historical, archaeological, cultural, architectural, community, aesthetic or artistic heritage of the City, retains a high degree of integrity, and meets one or more of the following criteria:

1. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
2. Is identified with persons or events significant in local, state, or national history;
3. Embodies distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
4. Represents the work of a notable builder, designer, or architect, or important creative individual;
5. Embodies elements that possess high artistic values or represents a significant structural or architectural achievement or innovation;



6. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning, or cultural landscape;
7. Is one of the last remaining examples in the City, region, State, or nation possessing distinguishing characteristics of an architectural or historical type or specimen; or
8. Has yielded or may be likely to yield, information important in history or prehistory.

An improvement or natural feature meeting one or more of the above criteria, yet not having the high degree of integrity to qualify as a landmark, may qualify as a structure or resource of merit. Further, an improvement or natural feature meeting one or more of the above criteria, yet not formally designated as a landmark by the City Council, may be an eligible landmark. (DUDEK-A, p. 17)

*Evaluation of NRHP and CRHR Eligibility*

The Project site meets the criteria for listing in the NRHP and CRHR under Criterion C and Criteria 3, respectively. To be eligible, a property must clearly contain enough characteristics of an architectural style to be a true representation of that style. Although there have been minor alterations to the exterior of the subject property, it has not undergone major exterior alterations and the building displays all its character-defining features of its Mid-Century Modern style and exhibits quality of design. The street-facing elevations retain the original design features. The Sears building on the Project parcel features asymmetrical massing, contrasting stone and tile materials, and landscaping incorporated into the design. (DUDEK-A, p. 60).

Further, the Sears building was designed by Charles Luckman who was a master mid-century architect who produced many Mid-Century Modern buildings throughout California. The Project parcel is not a significant representation of his work and does not embody a particular phase in his professional trajectory. There are better and more notable examples of Luckman's work exemplifying this in the region. Nonetheless the property is one of only two remaining Mid-Century Modern department stores in Riverside, the other being the Broadway at Tyler Galleria, also designed by Charles Luckman Associates, which has been modernized. (DUDEK-A, p. 60).

While the Sears building embodies the distinctive characteristics of the Mid-Century Modern department store, it does not appear to possess high artistic values by articulating a particular concept of design to the extent that it expresses an aesthetic ideal. The last component of Criteria 3, representing a significant and distinguishable entity whose components may lack individual distinction, is the most applicable to districts. The Project parcel does not appear likely to contribute to a potential historic district, due to the lack of a cohesive grouping of intact properties in the area. (DUDEK- A, p. 60).

While there are better examples of the Mid-Century Modern department store typology in the United States, the Project parcel is an excellent and rare example of its type for the City and as a result, could rise to the eligibility thresholds for both national and state listing. For these reasons, the property appears eligible for listing in both the NRHP and CRHR under Criterion C and 3, respectively as it embodies distinctive characteristics of a type, period, or method of construction as an excellent and rare example of a Mid-Century Modern department store in Riverside. (DUDEK-A, p. 61).

In addition to meeting Criterion C and Criteria 3, an eligible resource must retain integrity. All properties change over time and it is not necessary for a property to retain all its historic physical features or characteristics. However, the property must retain the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both why a property is significant and when it was significant. The property is sited in its original location at the intersection of

Arlington Avenue and Streeter Avenue. Thus, it maintains its integrity of location. The setting surrounding the property has changed little over time. Thus, the subject property retains its integrity of setting and feeling. The building has undergone no exterior alterations. Thus, the subject property retains its integrity in the areas of design, materials, and workmanship. The subject property conveys its historic character as a Mid-Century Modern department store. Thus, it maintains integrity of association. Therefore, the property retains integrity of location, setting, feeling, design, workmanship, materials, and association. (DUDEK-A, p. 63).

#### *Evaluation of Local Eligibility*

The property is eligible as a Landmark under Criteria 1, 3, 5, and 7 and for the reasons discussed above for NRHP and CRHR eligibility and detailed below.<sup>1</sup> . (DUDEK-A, p. 61)

#### *Landmark*

As explained above, the existing structures exemplify or reflect special elements of the City's architectural merit as an excellent example of the Mid-Century Modern style and the history of Modernism in Riverside so meet Landmark Criteria 1. The structure embodies the characteristics of a distinctive architectural style, period, or method of construction and is an intact example of a Mid-Century Modern department store designed by Charles Luckman, a master architect. Thus, it rises to the level of significance necessary to be considered under Landmark Criteria 3. The property also possesses high artistic value and represents an architectural achievement so meets Landmark Criteria 5. And finally, the property is one of many examples of a Mid-Century Modern department store and is common throughout the state. However, it is one of the only two Mid-Century Modern department stores in the City of Riverside. In 2009, the City of Riverside's Modernism context noted that the only other example of a 1960s Mid-Century Modern department store building was Broadway at Tyler Mall, also designed by Charles Luckman Associates. However, while that building still exists and its original design is recognizable, it has undergone more readily apparent modernization over the years than the Sears Department store building. Hence, the property appears to be a rare intact example of its architectural type in the City so meets Landmark Criteria 7.

#### *Historic Eligibility Conclusion*

As the property appears to be eligible for listing in the NRHP, CRHR and Riverside under MC Title 20, it is considered a historic resource for the purposes of CEQA. Under CEQA, a significant impact occurs when there is a "substantial adverse change" to the significance of a historical resource. This includes the physical demolition, destruction, relocation, or alteration of the historical resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. CEQA defines "materially impaired" as work that alters, in an adverse manner, those physical characteristics that convey the resource's historical significance and justify its inclusion in the CRHR, a local register of historical resources, or an historical resource survey.

#### *Adaptive Reuse*

Adaptive reuse of the Sears Department store for residential use was reviewed and considered. However, as discussed in greater detail in Section 8.0 – Alternatives of this DEIR, options to maintain the existing structure or portions of the structure will not be conducive to re-utilizing the structures for a number of structural reasons. Additionally, as the former Sear's building has been identified as eligible for historic listing, any adaptive reuse project would be required to be consistent with the Secretary of

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1 The Cultural Resources Technical Report also evaluated the Project site for Structure of Merit. However, since property is eligible as a landmark, it need not be evaluated as a Structure of Merit since that is a lesser significance.

the Interior's Standards for Rehabilitation (Standards). The National Parks Services indicated that the "Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility." (NPS-X) Attempting to maintain all of the existing walls of the structure and fill the basement level slab will result in a lack of natural daylight and ventilation for residential use. Hence, significant penetrations made along the perimeter of the Sears building will be necessary which would have a significant impact on the structural integrity of the existing building and would not be consistent with the Standards as the alteration would have impacts to features and spaces that characterize a property. Further, the exterior walls would be supported by the basement foundation with new supports placed at grade which may introduce ground settlement issues so is not structurally acceptable. And last, the existing exterior walls do not meet current seismic building code requirements. The existing walls would need to be reinforced with new walls inside of the existing exterior walls and associated vertical elements from these walls would need to be transferred down to the lowest foundation level with new foundations. Ultimately, the practicality, complexity, and cost of construction would deem the viability of this option unlikely especially due to the fact that the final product would not satisfy the desired adaptive re-use requirements the new structure would not resemble the Sears retail store building due to all of the changes required for new use. (AO, pp. 1-2; INNOVA, pp. 2-3).

Attempting to maintain only the north and south walls of the existing structure and filling the existing basement and pouring a new foundation, would meet the lighting and ventilation requirements for residential use under the California Building Code. However, this option would result in similar structural issues, fewer dwelling units, and would be considered facadism, rather than adaptive reuse and not consistent with the Standards. (AO, p. 2; INNOVA, pp. 2-3).

Attempting to maintain only the south and west walls of the existing structure and filling the existing basement and pouring a new foundation, would meet the lighting and ventilation requirements for residential use under the California Building Code. However, for the same reasons as above, this would not only result in few dwelling units, but result in similar structural issues as identified above. (AO, p. 3; INNOVA, pp. 2-3).

Other uses were also reviewed for consideration as discussed in Section 8.0 – Alternatives of this Draft EIR. "The *Re-Tenancing Feasibility Report* analyzed whether or not the existing Sears building could be a viable candidate for re-tenancing with retail or self-storage uses. The existing Sears structures were constructed nearly sixty years ago so nearly all major building systems are in need of replacement. Additionally asbestos is a common occurrence in older buildings so removal of asbestos would be warranted. The existing structures were built for a single owner-user. Creating individual storefronts for multiple smaller rental suites within the structure would require cutting and changing the load-bearing walls which is structurally infeasible. Furthermore, 50 percent of the structures' total floor area is in the form of a subterranean basement which is not a feasible space for a vast majority of retailers. Additionally, shopping centers featuring multiple retailers require individual metering of utilities. However, the existing site was designed such that all utilities are for a single user. Further, tenants like restaurants, gyms and clothing retailers all have very different mechanical, plumbing, and electrical demands. The former Sears Auto Center building is functionally obsolete and not practical for the needs of prospective retail tenants, all of whom are smaller than Sears. Moreover, potential credit-worthy retail and or entertainment tenants that require 100,000 to 200,000 square feet, would not locate to the existing site because it is located within a residential neighborhood location rather than a regional location. Further, this type of tenant would likely require their own prototype building, ultimately requiring demolition of the existing structures. (AXIOM, p. 5).



Typical self-storage facilities in Riverside are characteristically “horizontal” in nature. The horizontal storage allows users to drive right up to their garage and unload directly. “Vertical” stacked storage facilities are generally more urban where land is expensive and users are willing to unload, ride the freight elevator, and then wheel their items down a series of corridors to their locker. These facilities are typically located in dense urban areas.

This location within Riverside has had very little population growth or decline. The area has a large majority (approximately 64 percent) of housing units being are owner-occupied as opposed to renters. Renters move much more frequently, and thus have a higher need for storage units. Currently, there is already sufficient self-storage facilities in the market. Further, as noted in the structural report, the original suspended deck from 1963 would have to be rebuilt. Seismic and live loads for storage facilities under current building code are 2.5 times stronger than they were in 1963. Hence, the building in its existing condition is not structurally sound for vertical storage use. The modifications necessary to bring the structure up to current code and safety requirements, would result in a significant impact to the structural integrity of the existing building (AXIOM, p. 6.)

As it is not economically or technically feasible to re-use the building from an architectural, structural, and financial standpoint, the Project proposes to demolish the existing structures. Pursuant to MC 20.25, the Project will be subject to a Certificate of Appropriateness so will comply with this process. Demolition would result in a significant unavoidable direct impact on a historical resource and would be considered a substantial adverse change under CEQA. (DUDEK-A, p. 66). While mitigation measures would not reduce impacts to a less than significant level, implementation of mitigation measure **MM CR-1<sup>2</sup>** would require preparation a Historic American Building Survey (HABS) to document the historic nature of the structure. The new development will provide much needed housing to the City. PDFs will provide architectural elements that acknowledge the history of sites Mid-Century Modern architecture however the project will not be consistent with General Plan policies HP-1.3 and HP-5.1 because it will remove the existing structures. Thus, even with implementation of mitigation measure **MM CR-1**, the Project will cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Therefore, impacts are **significant and unavoidable**.

***Threshold: Would the Project cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5?***

A CHRIS database records search, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, background research, including a review of a geotechnical report, and an archaeological pedestrian survey were conducted as part of an archaeological resources assessment for this Project. No archaeological or tribal cultural resources were identified within the Project site as a result of these efforts. (DUDEK-A, p. 65; DUDEK-B, p. 5)

The CHRIS record searches indicated that 16 previous cultural resource investigations have been conducted within a half mile radius of the Project site. The investigations were conducted between 1995 and 2021 but none directly addressed the Project site. (DUDEK-A, pp. 23-24; DUDEK-B, p.1) This suggests that the Project site has not been subject to evaluation for the presence of cultural resources prior to its current development. The CHRIS records indicate that no previously recorded cultural resources have been identified within or adjacent to the Project site. No prehistoric sites or resources

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2. Mitigation measure MM CR-1 related Human Remains from the Initial Study has been renumbered to MM CR-5 and presented below in Section 5.3.8 for purposes of inclusion in the Project’s Mitigation Monitoring and Reporting Program.

documented to be of specific Native American origin have been previously recorded within the records search area or the Project site. (DUDEK-A, pp. 23-24)

The potential for intact cultural deposits to exist within native soils (encountered from 2 feet below ground surface in some areas) to the depths of proposed ground disturbance (approximately 8 feet below ground surface) is considered moderate. The Project site is within a geographical region known for supporting Native American occupation. The Project site is within the vicinity of two unnamed Native American villages and transportation routes as mapped on the 1938 Kirkman Harriman map. Additionally, the Project site is within the Santa Ana River watershed, an area that would provide sustainable resources for habitation. (DUDEK-A, p 65; DUDEK-B, p. 5) Archival research indicates that the Project site has been occupied since at least the early twentieth century. Initially used as agricultural land, the Project site transitioned to rural residential properties in the early to mid-twentieth century and again to a fully developed commercial property in the 1960s. (DUDEK-A, p 65).

While the “Spanish Town Road” as identified by the 1938 Kirkman Harriman map, intersects the Project site, no archaeological evidence of this feature was provided in the CHRIS records search results or review of other archaeological information. Additionally, the CHRIS results contained no archaeological evidence of the Native American villages within proximity to the Project site. This is likely because the nearest mapped villages are located outside the Project’s one half mile records search radius. (DUDEK-A, pp. 26).

Development of the Project site may have buried unknown cultural resources associated with Native American use and/or historic-period agricultural or residential properties. Native soils underlying the artificial fill consist of alluvial deposits from the terminal Pleistocene. These soils are considered contemporaneous with human use, and therefore retain the potential to preserve cultural material in context. (DUDEK-A, p. 65, DUDEK-B, p. 5)

Though the archaeological survey was negative for cultural resources, the existing development within the Project site provided little to no observable ground surface for inspection; thus, the negative findings of the archaeological survey are an unreliable indicator of the archaeological sensitivity of the Project site. Previous and proposed ground disturbances were considered in light of the potential for yet unknown archaeological resources and human remains to be encountered leading to a determination that there is a potential for an inadvertent discovery of unknown archaeological resources and human remains to occur during Project implementation. Implementation of mitigation measures **MM CR-2** through **MM CR-5** would ensure the proper treatment of any archaeological resources and human remains encountered during ground disturbing activities. (DUDEK-A, p 65). Thus, with implementation of mitigation measures **MM CR-2** through **MM CR-5**, the Project will not cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5. Therefore, impacts are **less than significant with mitigation incorporated**.

### 5.3.8 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts to cultural resources. Mitigation measure **MM CR-1** below, will not reduce potentially significant impacts to historical resources as the existing structures will be demolished. However, CEQA requires all feasible mitigation to be undertaken.

In the event of an inadvertent discovery the mitigation measures **MM CR-2** through **MM CR-5** shall be implemented to eliminate or reduce potentially significant impacts to cultural resources to below the level of significance.

**MM CR-1 Historical Resources.** Prior to the demolition or rehabilitation of the existing structures on the Project parcel, the City shall ensure preparation of Historic American Building Survey (HABS) Level I or Short Format-like documentation in accordance with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. All work shall be conducted by an architectural historian who meets the Secretary of the Interior's Professional Qualifications Standards for architectural history and/or history. The HABS-like documentation shall follow the guidelines set forth by the National Park Service (NPS) for HABS I or Short Format documentation. The HABS-like document shall include:

- Black and white photographs with large-format negatives of exterior and interior views (10 views minimum);
- Photograph Index;
- Photocopies with large-format negatives of select, existing drawings or historic views that are produced in accordance with the U.S. Copyright Act; and
- Full-length historical report, as outlined in the Guidelines for Architectural and Engineering Documentation in the Federal Register (68 FR 43159).

Large format photography shall be completed prior to issuance of any project related permitting or construction. Photographic documentation of the existing structures on the Project parcel shall be prepared to the National Park Service's HABS standards. A minimum of ten (10) views should be recorded, including views of the overall site and landscaping context as well as detailed views of each elevation of existing structures. HABS standards require large-format black-and-white photography, with the original negatives having a minimum size of 4 inches by 5 inches. The photographer shall be familiar with the recordation of historical resources in accordance with HABS guidelines, and digital photography, roll film, and manipulation of images are not acceptable. Photographs shall include a photo index, and field notes, and be identified and labeled using HABS standards outlined in National Park Service's guidelines Preparing HABS/HAER/HALS Documentation - Transmittal Guidelines.

A draft laser copy (or digital PDF) of the finished photographs formatted to the photo index shall be reviewed and approved by a historic preservation program staff member with City of Riverside prior to final archival prints being made. A copyright release form signed by the photographer releasing copyright of the large format photographs into the public domain for public benefit shall be required with the deliverables. One original copy of the final HABS-like documentation packet shall be offered to the following entities:

- City of Riverside Historic Preservation Program (administered through the Historic Preservation, Neighborhoods and Urban Design Division of the Community Development Department);
- Riverside Public Library;
- Riverside Historical Society; and



- Riverside Metropolitan Museum.

**MM CR-2 Archaeological Resources – Inadvertent Finds.** The applicant/owner/developer will retain a qualified archaeological principal investigator, as defined above, to assess information available (final grading and construction plans, geotechnical testing results, as-built plans, etc.) and determine the depth at which native soils exist and would be impacted by project implementation. The depth of native soils shall be included in the Plan so as to guide when cultural (archaeological and Native American) monitoring is appropriate. Impacts to cultural resources shall be minimized through implementation of pre- and post- construction tasks. Tasks pertaining to cultural resources include the development of a Cultural Resource Monitoring and Inadvertent Discovery Plan (Plan). The purpose of the Plan is to outline a program of monitoring occurrence as well as treatment and mitigation in the case of an inadvertent discovery of cultural resources during ground-disturbing phases (including but not limited to preconstruction site mobilization and testing, grubbing, removal of soils for remediation, construction ground disturbance, construction grading, trenching, and landscaping) and to provide for the proper identification, evaluation, treatment, and protection of any cultural resources throughout the duration of the Project. This Plan should define the process to be followed for the identification and management of cultural resources in the Project site during construction. The existence of and importance of adherence to this Plan should be stated on all Project site plans intended for use by those conducting the ground disturbing activities. The Plan will also include the conditions under which Native American and archaeological monitoring is required pursuant to **MM CR-4**, below, and the manner of facilitation.

**MM CR-3 Archaeological Resources - Preparation of a WEAP.** Prior to commencement of construction activities for all phases of Project implementation, the project applicant/owner/developer shall retain a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for Archaeology, to prepare a Worker Environmental Awareness Program (WEAP). The WEAP shall be submitted to the City for review and approval. All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the WEAP training is to provide specific details on the kinds of cultural materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources, tribal cultural resources, or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor, tribal monitor and archaeologist retained for the Project.

**MM CR-4 Archaeological Resources – Monitoring.** A qualified archaeologist shall be retained to be present during initial ground disturbance. Initial ground disturbance is defined as the removal of the upper two to eight feet below ground of existing soil. The timing of when cultural resource monitoring (archaeological and Native American) shall be required shall be outlined in the Cultural Resource Monitoring and Inadvertent Discovery Plan pursuant

to **MM CR-2**. More than one monitor may be required if multiple areas within the Project site are simultaneously exposed to initial ground disturbance causing monitoring to be hindered by the distance (more than 200 feet apart) of the simultaneous activities. A qualified archaeological principal investigator, meeting the Secretary of the Interior's Professional Qualification Standards, shall oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitor will be responsible for maintaining daily monitoring logs.

In the event that potential prehistoric or historical archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop and a qualified archaeologist must be notified immediately to assess the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan, testing, data recovery, or monitoring may be warranted. If Native American resources are discovered or are suspected, each of the consulting tribes for the Project will also be notified.

An archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance and submitted to the City for review. This report shall document compliance with approved mitigation, all implemented monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the City and the EIC

**MM CR-5** **Archaeological Resources – Human Remains.** In the event that human remains and associated funerary objects are inadvertently encountered during construction activities, the remains and funerary objects shall be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of either the Project site or nearby area (no less than 100 feet), is reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the NAHC. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection and determine, in consultation with the property owner, the disposition and treatment of the human remains. *(This mitigation measure was identified as MM CR-1 in the Initial Study. This mitigation measure has been renumbered to MM CR-5 for purposes of inclusion in the Project's Mitigation Monitoring and Reporting Program).*

### 5.3.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented

It was determined that existing structures on the Project parcel is eligible for listing as a historical resource according to NRHP, CRHR, under Criteria C/3 and as City of Riverside Cultural Heritage Landmark under Criteria 1, 3, 5, and 7 and Structure of Merit under Criteria 1, 4, and 6. As such, the existing structures are a historical resource under CEQA. Since the Project proposed to demolish the existing structures, the Project would result in significant and unavoidable impacts. While there are no mitigation measures that could reduce impacts from the demolition, the Project will be required to comply with mitigation measure **MM CR-1**. Nonetheless, even with implementation of mitigation measure **MM CR-1**, demolition of the existing structures will result in direct impact to a historical resource so impacts will be **significant and unavoidable** and a statement of overriding considerations will be required prior to Project approval.

Implementation of mitigation measures **MM CR-2** through **MM CR-5**, will reduce impacts to archaeological resources to **less than significant**.



## 5.4 Energy

The focus of this section is to analyze potential impacts related to energy. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics.

The analysis in this section is based on the *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for the Arlington Mixed Use Development Project, City of Riverside, California*, prepared by Albert A. Webb Associates dated October 27, 2023 (WEBB-A) and the *Energy Consumption Calculations*, prepared by Albert A. Webb Associates, July 2023 (WEBB-B). These documents are contained within their entirety in Appendix B to this document.

### 5.4.1 Setting

Energy sources are classified as non-renewable if they cannot be replenished in a short period of time. Therefore, non-renewable energy resources include fossil fuels. Fossil fuels, which consist of oil, coal, natural gas, and associated byproducts, provide the energy required for the vast majority of motorized vehicles and generation of electricity at power plants. Thus, the discussion of energy conservation most relevant to the Project is focused on Project-generated electricity demand, natural gas demand, and fuel consumption.

#### Electricity

The City of Riverside (City) is the primary distribution provider for electricity in the City and, as such, operates its own electrical utility, known as the City of Riverside Public Utilities (RPU). RPU provides service to most of the City including the Project site.

The City and RPU are dedicated to conserving energy generated by fossil fuels and increasing its portfolio of renewable energy sources. In 2022, 45 percent of RPU's energy supply was generated from renewable energy sources, which includes geothermal, wind, and solar power (RPU 2023a). RPU entered into its first significant contracts for renewable energy in 2002 and 2003, met a 20 percent Renewable Portfolio Standard (RPS) goal in 2010, and exceeded the RPS mandate of 33 percent by the year 2020, three years ahead of schedule. (IRP, p. 1-2). RPU's future forecasted RPS levels show that they will exceed 50 percent by 2023, yet is not forecasted to meet the 60 percent by 2030 Senate Bill (SB) 100 procurement targets; however, by 2024, sufficient excess renewable energy procurement volumes will have been accumulated (or saved) to "fill in" the renewable energy shortfalls between 2025 and 2030. Thus, RPU will be able to satisfy its minimum RPS compliance obligations in all compliance periods through 2030 per SB 100 (IRP, p. 12-3).

RPU's electricity consumption by sector as of 2021 is provided in **Table 5.4-A, RPU Electricity Consumption in 2021 (GWh)**.

**Table 5.4-A, RPU Electricity Consumption in 2021 (GWh)<sup>1</sup>**

Agricultural & Water Pump	Commercial Building	Commercial Other	Industry	Mining & Construction	Residential	Streetlight	Total Usage
29.52	970.42	50.25	277.60	16.30	753.58	16.56	<b>2,114.25</b>
Source: CEC2021a							
<b>Notes:</b>							
1. All units are in millions of kilowatt-hours (GWh) and rounded to the nearest whole number.							

As reported by the California Energy Commission (CEC), RPU consumed approximately 2,114 million kilowatt-hours (kWh) in 2021, of which approximately 754 million kWh were consumed by the residential sector and 50 million kWh were consumed by the commercial building sector, which are the sectors most relevant to the proposed Project. (CEC 2021a).

**Natural Gas**

The Southern California Gas Company (SCG) provides natural gas service to the City. As a public utility, SCG is under the jurisdiction of California Public Utilities Commission (CPUC) but can also be affected by actions of federal regulatory agencies (CPUC NGC). SCG is the principal distributor of natural gas in southern California, providing retail and wholesale customers with transportation, exchange, and storage services, and also procurement services to most retail core customers. SCG is a gas-only utility and, in addition to serving the residential, commercial, and industrial markets, provides gas for enhanced oil recovery and electric generation customers in southern California. (CGEU 2022, p. 112).

California’s existing gas supply portfolio is regionally diverse and includes supplies from on- and off-shore California sources, southwestern United States supply sources, the Rocky Mountains, and Canada (CGEU 2022, p. 15). The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from Pacific Gas and Electric (PG&E), SCG, San Diego Gas & Electric (SDG&E), Southwest Gas, and several smaller natural gas utilities. (CPUC NGC).

Natural gas demand statewide, including volumes not served by utility systems, is expected to decrease at an annual average rate of 1.1 percent through 2035, and residential gas demand is expected to decline at an annual average rate of 2.4 percent, commercial demand is projected to decrease at an annual average rate of 1.8 percent per year. While gas-fired generation and gas storage will continue to be important technologies that support long-term electric demand growth and growing integration of intermittent renewable resource generation, overall gas demand for electric generation is expected to decline due to statewide efforts to minimize greenhouse gas (GHG) emissions electric energy efficiency programs and additional renewable power generation.

SCG projects total gas demand to decrease at an annual rate of approximately 1.5 percent from 2022 to 2035. By comparison, the 2020 California Gas Report projected an annual decline in demand of 1.1 percent over the forecast horizon. The difference between the two forecasts is caused primarily by the modest economic growth, the forecasted energy efficiency and fuel substitution, tighter standards created by revised Title 24 Codes and Standards, and renewable energy goals that impact gas-fired electricity. (CGEU 2022, p. 115).

SCG also implements energy efficiency (EE) programs. SCG’s conservation and energy efficiency activities are intended to help customers evaluate energy efficient options, and encourage customers to install energy efficient equipment, such as offering rebates for new hot water heaters (CGEU 2022, p. 133). SCG’s cumulative annual energy efficiency cumulative savings goals for the residential sector, core commercial and industrial sector, and noncore commercial and industrial sector are expressed in billion cubic feet (Bcf) (CGEU 2018, p. 134). SCG’s goals for energy efficiency for 2023-2035 period are based on the 2020 EE forecast scaled to the goals approved in the recent EE proceeding goals decision, D.21-09-037<sup>1</sup>, which set EE goals through 2032. (CGEU2022, p. 134). SCG is subject to energy efficiency targets established by the Clean Energy and Pollution Reduction Act, or Senate Bill 350 (SB 350). SB 350, which was signed into law on October 7, 2015, extends the Renewable Portfolio Standard (RPS) target to 50 percent by 2030, which later was amended by 100 Percent Clean Energy Act of 2019, or Senate Bill 100 (SB 100). Additionally, the law requires the state to double statewide energy efficiency savings in both the electric and natural gas sectors by 2030. (CGEU 2022, pp. 163).

Natural gas service must be provided in accordance with SCG’s policies and extension rules on file with CPUC at the time contractual agreements are made. The viability of natural gas is based on present conditions of gas supply and regulatory policies. The natural gas consumption by sector within SCG’s service area is provided in **Table 5.4-B, Natural Gas Consumption in SCG Service Area (2021)**.

**Table 5.4-B, Natural Gas Consumption in SCG Service Area (2021)<sup>1</sup>**

<b>Agricultural &amp; Water Pump</b>	<b>Commercial Building</b>	<b>Commercial Other</b>	<b>Industry</b>	<b>Mining &amp; Construction</b>	<b>Residential</b>	<b>Total Usage</b>
84	844	94	1,650	169	2,261	<b>5,101</b>
Source: CEC2021b						
<b>Notes:</b>						
1. All numbers in millions of therms and rounded to the nearest whole number.						

As shown in the table above, SCG consumed approximately 5.1 billion therms in 2021, of which approximately 2.3 billion therms were consumed by the residential sector and 94 million therms were consumed by the commercial building sector, which are the sectors most relevant to the proposed Project. (CEC 2021b).

**Transportation Fuel**

Fossil fuels are known to create the United States’ transportation fuels. Fossil fuel energy sources include oil, coal, and natural gas, which are non-renewable resources that formed when prehistoric plants and animals died and were gradually buried by layers of rock; however, fossil fuel industries drill or mine for these energy sources, burn them to produce electricity, or refine them for use as fuel for heating or transportation. (USDOE).

The U.S. and specifically California is defined by the automobile: in 2023, there were over 35.6 million vehicles registered in California by the Department of Motor Vehicles (CDMV 2023). In 2021, 38.7

1. Source: CPUC D.17.09.025



percent<sup>2</sup> of all of California's energy use was used for transportation, approximately 2,785.1 trillion British thermal units (Btu) (USEIA F30). In 2021, California consumed 511,318 thousand barrels<sup>3</sup> of petroleum for transportation uses, which is approximately 2,730.9 trillion Btu. (USEIA CT7).

The 2021 Integrated Energy Policy Report (IEPR), which provides the results of the California Energy Commissions assessments of a variety of energy related issues facing California. The IEPR includes a transportation energy and demand forecast that considers vehicles and associated fuels, incorporates consumer preference, regulatory impacts, economic and demographic projects, projected improvements in technology, and other market factors. (TEFA, pp. 3-4). The most recent forecast estimated that between 2021 and 2035, gasoline fuel demand for transportation in California will decline primarily due to increases in electrification and the use of zero emission vehicles (ZEV) (TEFA, pp. 50-70). Petroleum-based fuels will continue to represent the largest shares of transportation energy demand. Under the high-demand case for Light Duty Vehicle, gasoline consumption will drop from approximately 13.8 billion gross gasoline equivalents (GGE) in 2020 to approximately 11 billion GGE in 2035. Electricity consumption would increase from less than 1 billion GGE in 2020 to approximately 4 billion GGE which includes raw energy used by the plug in-vehicles (PEV), but also the gasoline energy avoided by using more PEVs. Diesel energy forecast is less than 1 GGE in 2020 and will remain roughly the same in 2035. (TEFA, p. 67).

## 5.4.2 Related Regulations

### Federal Regulations

At the federal level, the United States Department of Transportation (USDOT), the United States Department of Energy (DOE), and the United States Environmental Protection Agency (USEPA) are three agencies with substantial influence over energy policies and programs. Federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. Major federal energy-related laws and plans are discussed below.

#### *Energy Independence and Security Act*

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. Among other key measures, the Act would do the following, which would aid in the reduction of national mobile and non-mobile GHG emissions:

- 1 Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- 2 Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- 3 While superseded by the National Highway Traffic and Safety Administration (NHTSA) and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks

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2. 2,785.1 trillion Btu (from transportation consumption in California) / 7,202.6 trillion Btu (from total energy consumption in California) = approximately 38.7 percent.

3. One barrel (in reference to petroleum) is a unit of volume equal to 42 U.S. gallons (USEIA Glossary)

and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs." (WH)

#### *Federal Energy Policy and Conservation Act (EPCA)*

The Federal Energy Policy and Conservation Act (EPCA) of 1975 grants specific authority to the President of the U.S. to fulfill obligations of the U.S. under the international energy program; provide for the creation of a Strategic Petroleum Reserve capable of reducing the impact of severe energy supply interruptions; conserve energy supplies through energy conservation programs; provide for improved energy efficiency of motor vehicles, major appliances and other consumer products; provide a means for verification of energy data to assure the reliability of energy data; and to conserve water by improving the water efficiency of certain plumbing products and appliances. Furthermore, the EPCA establishes fuel economy standards for on-road motor vehicles in the US. (EPCA 1975).

The NHTSA, which is part of USDOT, is responsible for establishing additional vehicle standards and revising existing standards under the EPCA. In 2012, NHTSA established passenger and light truck Corporate Average Fuel Economy (café) standards for model years (MY) 2017 through 2021 which required, on an average industry fleet-wide basis, a range from 40.3 to 41.0 miles per gallon in model year (MY) 2021 (NHTSA 2012). In 2019, the NHTSA and USEPA amended certain café and greenhouse gas emissions standards for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. However, in March 2022, the NHTSA and USEPA revised the standards covering MY 2024 through 2026 and would require an industry fleet-wide average of roughly 49 mpg in MY 2026. (NHTSA 2022).

#### *The Transportation Equity Act for the 21<sup>st</sup> Century (TEA-21)*

The Transportation Equity Act for the 21st Century (TEA-21) builds upon the initiatives established in the ISTEA legislation discussed previously (DOT). TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs (FHWA 2015). TEA-21 continues the program structure established for highways and transit under ISTEA, such as flexibility in the use of funds, emphasis on measures to improve the environment, and focus on a strong planning process as the foundation of good transportation decisions. TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through, for example, deployment of Intelligent Transportation Systems, to help improve operations and management of transportation systems and vehicle safety. (FHWA 1998).

#### *Energy Star Program*

In 1992, the USEPA introduced Energy Star as a voluntary labeling program to identify and promote energy-efficient products to reduce GHG emissions. The program applies to major household appliances, lighting, computers, and building components, such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specification for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now includes qualifying commercial and industrial buildings as well as homes.

## State Regulations

At the State level, the CEC and CPUC are two agencies with authority over different aspects of energy. CPUC regulates privately-owned utilities in the energy, rail, telecommunications, and water sectors. CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes, and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards. California is exempt under federal law from setting State fuel economy standards for new on-road motor vehicles. Major State energy-related laws and plans are discussed below.

### *California Air Resources Board (CARB)*

The California Air Resources Board (CARB) is part of the California Environmental Protection Agency and is responsible for overseeing the implementation of the California Clean Air Act, meeting State requirements of the Federal Clean Air Act, and the establishment of State ambient air quality standards. CARB is also responsible for setting emission standards for vehicles sold in California and for other emissions-sources including consumer goods and off-road equipment. In general, these vehicle emissions standards are more restrictive than those established at the federal level. CARB also established passenger vehicle fuel specifications, which became effective in March 1996.

### *Advanced Clean Cars*

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog-causing pollutants and GHGs with requirements for greater numbers of ZEVs. By 2025, when the rules will be fully implemented, the new automobiles will emit 40 percent fewer GHG emissions and 75 percent fewer smog-forming emissions. The program also requires car manufacturers to offer for sale an increasing number of ZEVs each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles (EV) (CARB ACCP).

In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017-2025 through compliance with the USEPA GHG requirements for those same model years (CARB 2012). In 2022, the Advanced Clean Cars II program was approved, which will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will have zero emissions.

### *Low Carbon Fuel Standard*

Executive Order S-01-07 was signed on January 18, 2007, the Low Carbon Fuel Standard (LCFS) and mandated a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In 2009, CARB adopted the LCFS and began implementation on January 1, 2011.

CARB approved some amendments to the LCFS in December 2011, which were implemented on January 1, 2013. In September 2015, the Board approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the Board approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. (CARB 2023a).



### *California Energy Commission (CEC)*

The CEC was formed by Assembly Bill 1575 (AB 1575), also known as the Warren-Alquist Act (CEC WAA) and is the State's primary energy policy and planning agency. AB 1575 also requires EIRs to consider wasteful, inefficient, and unnecessary consumption of energy and was the driving force behind the creation of Appendix F to the *CEQA Guidelines*. CEC was established to address the State's energy challenges and is responsible for the creation of the State Energy Plan. The State Energy Plan identifies the emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The State Energy Plan recommends that the State assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. The State Energy Plan also identifies a number of strategies, including providing assistance to public agencies and fleet operators, encouraging urban designs that reduce vehicles miles traveled, and accommodating pedestrian and bicycle access.

### *California Public Utilities Commission (CPUC)*

CPUC regulates investor-owned electric and natural gas utilities operating in California, which includes SCG (CPUC Electric). The CPUC regulates the natural gas rates and natural gas services, including in-State transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering, and billing (CPUC NGC). In 2008, the CPUC adopted the state's first "Long-Term Energy Efficiency Strategic Plan" for achieving energy savings in various sectors throughout California. In 2011, the Strategic Plan was updated to include a chapter related to lighting (CPUC EESP).

### *California Energy Code – Title 24 of the California Code of Regulations*

Energy consumption by new buildings in the State is regulated by The California Energy Code via the Building Energy Efficiency Standards. These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings. They are designed to reduce wasteful, uneconomic, inefficient, or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality (CEC Standards). Building efficiency standards are enforced through the local building permit process, via plan check and inspections (CEC Standards).

The California Energy Code (Title 24, Part 6 of the California Code of Regulations (CCR) was established in 1976 to reduce California's energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle. The current code is the 2022 Building Energy Efficiency Standards, and it went into effect on January 1, 2023. (CEC Standards).

The purpose of Title 24, specifically Part 11, known as the California Green Building Standards (CALGreen) Code, is to encourage sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code is applicable to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure throughout the State (CALGreen). The current cycle of the CALGreen Code was adopted in 2022 and became effective January 1, 2023. Applicable requirements of the CALGreen Code can be found in Section 5.5 Greenhouse Gas Emissions.

Over the next 30 years, the 2022 Energy Code is estimated to provide \$1.5 billion in consumer benefits and reduce 10 million metric tons of GHGs, equivalent to taking nearly 2.2 million cars off the road for a year. Expanded adoption of new energy-efficient technologies will help reduce costs of the technology

over time. (CEC Infographic). Local government agencies may adopt and enforce energy standards for new buildings, provided that standards meet or exceed those contained in Title 24 (CEC LO). The City's municipal code, Chapter 16.13 – Energy Code, adopted the 2022 Energy Code standards. (RMC).

#### *California Integrated Waste Management Act of 1989*

The California Integrated Waste Management Act of 1989 (AB 939) requires each jurisdiction in California (cities, counties, and approved regional solid waste management agencies) responsible for enacting plans and implementing programs to divert 25 percent of their solid waste by 1995 and 50 percent by year 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year. The California Department of Resources Recycling and Recovery (CalRecycle) oversees and provides assistance to local governments as they develop and implement plans to meet the mandates of the AB939 and subsequent legislation. (CalRecycle 2023) As of 2007, jurisdictional diversion rates are no longer calculated; with the passage of the Per Capita Disposal Measurement System (SB 1016) only per capita disposal rates are measured. CalRecycle compares each jurisdiction's reported disposal tons to population to calculate per capita disposal in pounds per person per day (CalRecycle JD). The City achieved an annual per capita disposal rate of 8.2 pounds per day per resident, and 16.8 pounds per day per employee in 2021, the most recent data available (CalRecycle Riverside).

AB 939 further requires each city to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would manage solid waste generated within the city (PRC 41000-41003). The City's solid waste management must be consistent with the hierarchy of waste management practices of AB 939, which are (in order of priority): (1) source reduction; (2) recycling and composting; (3) environmentally safe transformation and environmentally safe land disposal, at the discretion of the city or county (PRC 40051). SRREs shall place primary emphasis on implementation of all feasible source reduction, recycling, and composting programs while identifying the amount of landfill and transformation capacity that will be needed for solid waste which cannot be reduced at the source, recycled, or composted. Each SRRE shall include, but is not limited to, all of the following components for solid waste generated in the jurisdiction of the plan: (a) A waste characterization component; (b) A source reduction component; (c) A recycling component; (d) A composting component; (e) A solid waste facility capacity component; (f) An education and public information component; (g) A funding component; and (h) A special waste component (PRC 41000-41003). California local jurisdictions are required to submit annual reports to CalRecycle to update it on their progress toward implementing the AB 939 goals (CalRecycle 2019).

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter (PRC 41780.01). The state did not meet its 75 percent by 2020 recycling goal set out in AB 341. However, CalRecycle identified five strategies and three additional focus areas that can be pursued by the state to reach the 75 percent goal (CalRecycle 2020).

Riverside's Public Works Department provides solid waste services to the City of Riverside, including the Project site (GP EIR, p.5.16-15).

#### *Renewable Portfolio Standard*

Established in 2002 under SB 1078, accelerated in 2006 under SB 107 and again in 2011 under SBX1-2, California's RPS requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020 (SB 1078, SB 1368). In 2015, SB

SB 350 was signed into law, which mandated a 50 percent mandate by December 31, 2030. SB 350 includes interim annual targets with three-year compliance periods. In addition, SB 350 requires that 65 percent of procurement must be derived from long-term contracts of 10 or more years. In 2018, SB 100 was signed into law, which again increases the mandate to 60 percent by 2030 and requires all California's electricity to come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019 (CPUC RPS). Utilities are required to disclose to consumers “accurate, reliable, and simple to understand information on the sources of energy, and the associated emissions of greenhouse gases, which are used to provide electric services.” (PUC 398.1).

#### *Assembly Bill 1109*

Assembly Bill 1109 (AB 1109), the Lighting Efficiency and Toxic Reduction Act, required the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018 (AB-1109).

#### *Senate Bill 100*

Senate Bill 100 (SB 100), signed September 10, 2018, is the 100 Percent Clean Energy Act of 2018. SB 100 established a landmark policy requiring renewable energy and zero-carbon resources supply 100 percent of electric retail sales to end-use customers by 2045. SB 100:

- Sets a 2045 goal of powering all retail electricity sold in California and state agency electricity needs with renewable and zero-carbon resources — those such as solar and wind energy that do not emit climate-altering greenhouse gases.
- Updates the state’s Renewables Portfolio Standard to ensure that by 2030 at least 60 percent of California’s electricity is renewable.
- Requires the Energy Commission, CPUC and CARB to use programs under existing laws to achieve 100 percent clean electricity and issue a joint policy report on SB 100 by 2021 and every four years thereafter.

#### *Senate Bill 350*

Senate Bill 350 (SB 350), signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The objectives of SB 350 are (SB-350):

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

## **Regional Regulations**

There are no regional regulations that relate to energy and this Project.

## **Local Regulations**

### *City of Riverside 2025 General Plan*

The City of Riverside 2025 General Plan contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. A-35; OS-54 – OS-55; PF-28):



***Air Quality Element***

- Objective AQ-5 Increase energy efficiency and conservation in an effort to reduce air pollution. policies that are considered applicable to the proposed Project, as identified below:
- Policy AQ-5.1 Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste disposed of in landfills.
- Policy AQ-5.3 Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.
- Policy AQ-5.6 Support the use of automated equipment for conditioned facilities to control heating and air conditioning.
- Policy AQ-5.7 Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.

***Open Space & Conservation Element***

- Policy OS-8.2 Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24 and encourage the installation of conservation devices in existing developments.
- Policy OS-8.3 Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources.
- Policy OS-8.4 Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities.
- Policy OS-8.5 Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools).
- Policy OS-8.6 Require all new development to incorporate energy efficient lighting, heating, and cooling systems pursuant to the Uniform Building Code and Title 24.
- Policy OS-8.7 Encourage mixed use development as a means of reducing the need for auto travel.
- Policy OS-8.10 Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.
- Policy OS-8.12 Require bicycle parking in new non-residential development.

***Public Facilities and Infrastructure Element***

- Objective PF-6 Provide affordable, reliable, and, to the extent practical, environmentally sensitive energy resources to residents and businesses.
- Policy PF-6.3 Promote and encourage energy conservation.

Policy PF-6.4 Encourage energy-efficient development through its site plan and building design standard guidelines.

Policy PF-6.5 Promote green building design.

*City of Riverside 2025 General Plan EIR*

The are no applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to energy.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.

*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUUI EIR that pertain to energy.

*City of Riverside Restorative Growthprint*

The Riverside Restorative Growthprint, adopted January 2016, consists of the City's Economic Prosperity Action Plan and Climate Action Plan (CAP), which work in conjunction to spur entrepreneurship and smart growth while advancing the City's GHG emission reduction goals through the year 2035 (RRG). The CAP prioritizes the implementation of policies that enable the City to fulfill the requirements of State initiatives, Assembly Bill 32 and Senate Bill 375. The CAP includes a baseline GHG inventory for local government operations and for the community as a whole and establishes emission reduction targets consistent with State law. Through stakeholder engagement and cost-benefit analysis, the CAP resulted in strategies, measures, and actions for reducing emissions that align with the City's planning priorities and its vision of a future economy based on clean, green businesses and business practices.

*Envision Riverside 2025, City of Riverside Strategic Plan*

The City's 2025 Strategic Plan, known as Envision Riverside, identifies a clear vision for the future of Riverside's Economy, Community and Environment. It is comprised of the City Council's strategic policies and operational workplan to advance the City's potential. One of the six priorities of Envision Riverside is Environmental Stewardship, with one of the major themes being Sustainability and Resiliency. Environmental Stewardship goals include: rapidly decreasing Riverside's carbon footprint by acting urgently to reach a zero carbon electric grid with the goal of reaching 100 percent zero carbon electricity production by 2040 with continuing to ensure safe, reliable, and affordable energy for all residents; and implementing the requisite measures to achieve citywide carbon neutrality no later than 2040.

*City of Riverside Municipal Code*

The following sections of the City's Municipal Code are applicable and pertain to energy.

**Chapter 16.07 Green Code.** This chapter adopts the California Green Building Code or "Green Code" standards as the City's standards.

**Chapter 16.13 Energy Code.** This chapter adopts the California Energy Code, 2022 Edition, Part 6 of Title 24 standards as the City's standards.

**Chapter 16.26 Electrification of New Buildings.** This chapter sets forth the City’s standards for the electrification of newly constructed buildings. New building permits filed after January 6, 2023 for buildings three stories or less require electrification and buildings four or more stories are subject to this requirement in January 2026.

### 5.4.3 Comments Received in Response to the Initial Study/Notice of Preparation

No comments were received regarding energy resources in response to the Initial Study/Notice of Preparation (IS/NOP).

### 5.4.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State CEQA Guidelines.

As identified in the Initial Study (Appendix A), prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

### 5.4.5 Project Design Features

The proposed Project will be designed and constructed to meet all applicable standards under CALGreen, Title 24, and Municipal Code 16.26 (Electrification of New Buildings), as described in Section 5.4.2, above. In particular, the Project will include the following design features:

- Rooftop and carport solar panels, consistent with the 2022 CALGreen code;
- Residential appliances installed by the developer will be Energy Star-rated; and
- Waste reduction program.

Where possible, these features have been quantified in the Project’s energy demand estimates, as described in *Section 5.4.7*, below.

### 5.4.6 Methodology

The estimation of energy impacts is based on the greenhouse gas emissions modeling prepared for the Project by Albert A. Webb Associates. The Greenhouse Gas Modeling Outputs are included as Appendix B. The California Emissions Estimator Model (CalEEMod™) version 2022.1 program was used to quantify project-related emissions and the output includes annual building electricity and natural gas consumption. Because the CalEEMod program does not display the amount and fuel type for mobile sources, additional calculations were conducted and included in the *Energy Calculation Tables* (WEBB-B) found in Appendix B of this Draft EIR are summarized herein.



## 5.4.7 Environmental Impacts

### ***Threshold: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

The analysis in this section addresses each of the six potential energy impacts identified in Appendix F of the *State CEQA Guidelines* and utilizes the assumptions from the *Air Quality/Greenhouse Gas Analysis* (WEBB-A found in Appendix B of this Draft EIR) for this Project evaluated in Sections 5.2 Air Quality and 5.5 Greenhouse Gas Emissions of this Draft EIR. Because the California Emissions Estimator Model (CalEEMod) program used in WEBB-A does not display the amount and fuel type for construction-related sources, additional calculations were conducted in the *Energy Consumption Calculations* (WEBB-B found in Appendix B of this Draft EIR) and are summarized below.

*State CEQA Guidelines Appendix F* provides for assessing potential impacts that a project could have on energy supplies, focusing on the goal of conserving energy by ensuring that projects use energy wisely and efficiently. Pursuant to impact possibilities listed in *State CEQA Guidelines Appendix F*, an impact with regard to energy consumption and conservation will occur if implementation of the proposed Project will:

- Result in the wasteful, inefficient, or unnecessary consumption of energy. Impacts may include:
  1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal;
  2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
  3. The effects of the project on peak and base period demands for electricity and other forms of energy;
  4. The degree to which the project complies with existing energy standards;
  5. The effects of the project on energy resources;
  6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The analysis below addresses each of the six potential energy impacts identified in the *State CEQA Guidelines Appendix F*.

1. *The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal.*

#### *Construction*

Project construction would require the use of construction equipment for demolition, grading, building construction, paving, and painting (architectural coating) activities, as well as construction workers and vendors traveling to and from the Project site (WEBB-A, pp.3- 4). Construction equipment requires diesel as the fuel source (see **Table 5.4-C, Construction Energy Use**, below). Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files as part of WEBB-A. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of SCAQMD's *CEQA Air Quality Handbook* (SCAQMD 1993, p. A9-6).

Fuel consumption from construction worker and vendor/delivery trucks was calculated using trip rates consistent with the proposed development (specifically the construction of dwelling units and nonresidential square footage) and distances provided in the CalEEMod construction output files (WEBB-A, p. 4). Total vehicle miles traveled (VMT) was then calculated as provided in the CalEEMod output files (see WEBB-A) and divided by the corresponding county-specific miles per gallon factor using the 2021 version of CARB’s Emission FACTor (EMFAC) model. Consistent with CalEEMod, construction worker trips were assumed to include 100 percent gasoline powered vehicles. Construction vendor trucks were assumed to be medium-duty and heavy-duty diesel trucks (WEBB-B, Table 1 and 2).

As shown below in **Table 5.4-C**, a total of 102,142 gallons of diesel fuel, and 132,601 gallons of gasoline is estimated to be consumed during Project site construction.

**Table 5.4-C, Construction Energy Use**

Fuel	Fuel Consumption (Gallons)
<b>Diesel</b>	
On-Road Construction Trips <sup>1</sup>	44,105
Off-Road Construction Equipment <sup>2</sup>	58,037
<b>Diesel Total</b>	<b>102,142</b>
<b>Gasoline</b>	
On-Road Construction Trips <sup>1</sup>	132,601
Off-Road Construction Equipment <sup>3</sup>	--
<b>Gasoline Total</b>	<b>132,601</b>
Source: WEBB-B, Table 1	
Notes:	
1. On-road mobile source fuel use based on vehicle miles traveled (VMT) from CalEEMod for construction in 2024 and fleet-average fuel consumption in gallons per mile from EMFAC2021 web based data for Riverside County portion of Basin. See Table 2 for calculation details.	
2. Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on SCAQMD CEQA Air Quality Handbook, Table A9-3E.	
3. All emissions from off-road construction equipment were assumed to be diesel.	

The annual fuel usage for on-road construction trips can be broken down more specifically as follows: 132,601 gallons of gasoline for worker trips (as shown above, under “On-Road Construction Trips”) and 36,833 gallons of diesel for vendor trips. The annual fuel usage for hauling trips associated with the Project is 7,272 of diesel (WEBB-B, Table 2).

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Construction equipment is also required to comply with regulations limiting idling to five minutes or less (CCR 13).

Furthermore, there are no unusual Project site characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in

other parts of the State. For comparison, the State of California consumed approximately 13.9 billion gallons of gasoline (CDTFA Gas) and approximately 3.1 billion gallons of diesel fuel (CDTFA Diesel) in 2022, which is the most recent published data. Thus, the fuel usage during Project construction would account for a negligible percent of the existing gasoline and diesel fuel related energy consumption in the State of California. Furthermore, it is expected that construction-related fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than at other construction sites in the region.

### *Operation*

The Project will promote building energy efficiency through compliance with energy efficiency standards (Title 24 and CALGreen, as discussed under *Section 5.4.2*). The Project also reduces vehicle fuel usage due to compliance with regulatory programs that reduce VMT. AB 1493 ("the Pavley Standard") requires reduction in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. Executive Order S-01-07 went into effect in 2010 and required a reduction in the carbon intensity of transportation fuels used in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California. The Advanced Clean Cars I and II program, first introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2035.

For operational activities, annual electricity and natural gas consumption were calculated using demand factors provided in the CalEEMod output as part of the *Air Quality/Greenhouse Gas Analysis* completed for this Project based on the 2019 Title 24 standards (WEBB-A). The Project site's electrical consumption was estimated to be approximately 3,741,155 kWh of electricity per year; this is the sum of the building electricity (3,595,054 kWh/year) and electricity related to the Project's water consumption (146,101 kWh/year). Additionally, the Project's natural gas consumption was estimated to be approximately 370,677 kilo-British thermal units (kBtus) per year for the proposed retail land uses (WEBB-B, Table 3).

As previously stated in *Section 5.4.2*, building electrification is required for the Project pursuant to the City municipal code (Chapter 16.26). Accordingly, CalEEMod mitigation measure E-15, which requires all electric development was incorporated as part of Project design. However, CalEEMod only quantifies reductions from the residential land use for this measure. Therefore, the natural gas emissions are overstated and provide a conservative analysis. Additionally, as stated in *Section 5.4.5*, the Project design also includes energy star-rated appliances in the residential buildings. Therefore, the CalEEMod mitigation measure E-2 was incorporated as part of Project design for installation of energy star-rated, refrigerators, dishwashers, washing machines, and ceiling fans. Finally, the Project will incorporate solar panels on rooftops and/or carports consistent with the 2022 California Green Building Code. The energy production from the Project's solar panels were not quantified, providing a more conservative estimate of energy-related emissions. (WEBB-A, p. 10).

In comparison to the Project, RPU produced approximately 2.1 billion kWh of electricity in 2021 (CEC 2021a) and SCG produced approximately 5.1 billion therms of natural gas in 2021 (CEC 2021b). At full build-out, the Project site's electricity demand would be a negligible amount of the existing electricity and the natural gas demand would be a negligible percent of the existing natural gas use in SCG's service area.



Energy impacts associated with transportation during operation were also assessed using the traffic data contained in (WEBB-A). Based on the annual VMT, gasoline and diesel consumption rates were calculated using the Riverside County-specific miles per gallon in EMFAC2021. A total of 94,587 gallons of diesel fuel, and 518,772 gallons of gasoline is estimated to be consumed each year from the Project operation (WEBB-B, Table 3). As stated above, the State of California consumed approximately 13.9 billion gallons of gasoline (CDTFA Gas) and 3.1 billion gallons of diesel fuel (CDTFA Diesel) in 2022. Thus, the annual fuel usage during Project operation would account for a negligible percent of the existing diesel fuel and gasoline related energy consumption in California.

To summarize, regulations previously identified related to energy conservation and fuel efficiency include, but are not limited to, Title 24 building energy efficiency standards and CALGreen, Pavley standards, and the Advanced Clean Cars Program. Collectively, compliance with regulatory programs would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy with regards to the Project's energy requirements and its energy use efficiencies.

2. *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

As addressed above, the Project's electricity consumption was minimal in comparison to RPU's supply. The Project will comply with applicable state, RPU, and GP goals and policies that require energy conservation and increase reliance on renewable energy to reduce electricity demand within the Project site. As discussed above, RPU's total electricity consumption was approximately 2,114 million kilowatt-hours in 2021 as reflected in **Table 5.4-A** above. The Project demand would be a negligible amount of RPU's existing electricity use. As such, there will be adequate capacity to serve the proposed Project.

As addressed above, the Project's natural gas consumption was estimated to be approximately 370,677 kBtus per year (or 3,708 therms per year). The Project will comply with applicable California Public Utilities Commission (CPUC), state, SCG, and GP goals and policies that require energy conservation to reduce natural gas demand within the Project area. As discussed above, the Project demand would be a negligible percent of SCG's existing natural gas use. As the proposed Project's overall consumption of natural gas use is comparatively insignificant to existing SCG-wide use and as SCG continuously expands its network, as needed, to meet the need in Southern California, there will be adequate capacity to serve the proposed Project. Further, towards this same end, it should also be noted that SCG projects total gas demand to decline at an annual rate of 0.74 percent from 2018 to 2035 as a result of modest economic growth, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (CGEU 2018, p. 68). Lastly, the Project is subject to the City's electrification requirements for new buildings which further avoids the natural gas estimates calculated for the Project; therefore, natural gas consumption from the Project's retail component was overestimated and provides a more conservative analysis. The Project would therefore not have a significant effect on local and regional energy supplies.

*3. The effects of the project on peak and base period demands for electricity and other forms of energy.*

As described above, RPU produced approximately 2,114 million kWh in 2021 as reflected in **Table 5.4-A** above, and the Project is expected to have a negligible impact to RPU's total electricity usage. Therefore, it can be stated that the Project will not have a substantial effect on energy supplies.

The Project will meet Title 24 building energy efficiency standards and CALGreen. With regard to peak hour demands, purveyors of energy resources, including RPU, have established long standing energy conservation programs to encourage consumers to adopt energy conservation habits and reduce energy consumption during peak demand periods. The proposed Project supports these efforts through GP policies identified above that will not only reduce energy consumption during peak hour demands, but also during the base period. To this end, the Project will not substantially affect peak and base period demands for electricity or other forms of energy, such as natural gas.

*4. The degree to which the project complies with existing energy standards.*

The proposed Project would be required to comply with City, state and federal energy conservation measures related to construction and operations. Many of the regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, promoting sustainability through energy conservation measures, as well as reducing water consumption and VMT. As described above, the proposed Project will meet and/or exceed these regulatory requirements.

The California Energy Code standards include provisions applicable to all buildings, residential and non-residential, which are mandatory requirements for efficiency and design. The provisions would be accomplished through implementation of energy reduction measures, such as energy efficient lighting and appliances. The Project would comply fully with existing energy standards.

In addition, the Project will be consistent with applicable goals and polices within the GP. Through implementation of energy conservation measures and sustainable practices, the Project will not use large amounts of energy in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

*5. The effects of the project on energy resources.*

The effects of the Project on energy supplies and resources from a capacity standpoint are described above in the preceding analysis. In regard to the effects of the Project on energy resources, the Project is required to ensure that the Project does not result in the inefficient, unnecessary, or wasteful consumption of energy. Notable regulatory measures that are discussed above include compliance with California Title 24 and CALGreen Standards, RPS, Pavley standards and the Advanced Clean Cars Program.

*6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

As stated above, energy impacts associated with transportation during construction and operation of the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy through adherence to existing regulations and GP policies and implementation of design features. Regarding efficient transportation alternatives, the Project will provide alternative transportation

choices because Riverside Transit Agency (RTA) operates two bus routes that travel along Streeter Avenue and Arlington Avenue, Routes 15 and 12. Two existing bus stops are provided along the Project frontage. Additionally, the Project will comply with CALGreen requirements which require bike racks and electric vehicle (EV) capable parking spaces and electric vehicle charging stations (EVCS), in addition to the specific design features incorporated in the Project. Implementation of these various measures decreases reliance on fossil fuels. For the reasons described above, the Project promotes efficient alternative transportation choices.

In conclusion, for the reasons outlined above, the proposed Project will not result in the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, impacts would be **less than significant**.

***Threshold: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

As stated in *Section 5.4.2*, above, the City of Riverside's General Plan Air Quality Element identifies objectives and policies that indirectly increase energy efficiency and reduce energy consumption in the City. Additionally, the City's Riverside Restorative Growthprint includes a CAP, which advances the City's GHG emission reduction goals through the year 2035. CAP Table B.3-2, 2020 and 2035 Reductions from Local Measures, lists local GHG reduction measures that increase energy efficiency and reduce energy consumption.

As stated in *Section 5.5 - Greenhouse Gas Emissions* of this Draft EIR, the Project complies with the regulations and GHG reduction goals, policies, actions, and strategies outlined in the City's CAP. As previously stated, the proposed Project will comply with Title 24 standards for insulation, glazing, lighting, shading, photovoltaic systems on residential homes, and water and space-heating systems in all new construction. The Project will also comply with the CALGreen Code which implements sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Moreover, the service providers (RPU and SCG) are subject to renewable energy requirements under the RPS. Through the use of modern energy-efficient construction materials and practices, compliance with current Title 24 standards, the proposed Project will be consistent with the state's energy conservation standards.

Thus, the proposed Project would not conflict with an adopted energy conservation plan. Therefore, impacts would be **less than significant**.

### **5.4.8 Recommended Mitigation Measures**

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (*State CEQA Guidelines*, Section 15126.4). There are no mitigation measures required to reduce impacts to energy resources since impacts are less than significant.

### **5.4.9 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented**

There are no mitigation measures required to reduce impacts to energy resources.



## 5.5 Greenhouse Gas Emissions

The focus of this section is to analyze potential impacts related to greenhouse gas emissions (GHGs). The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics of this Draft EIR.

The analysis in this section is based on the *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for the Arlington Mixed Use Development Project, City of Riverside, California*, prepared by Albert A. Webb Associates dated October 27, 2023 (WEBB-A). This report is contained within its entirety in Appendix B to this document.

### 5.5.1 Setting

Naturally occurring gases dispersed in the atmosphere determine the Earth’s climate by trapping infrared radiation (heat). This phenomenon is known as the greenhouse effect and without it, the Earth would be about -2 degrees Fahrenheit (°F). Overwhelming evidence shows that human activities are increasing the concentration of GHGs in the atmosphere, trapping more heat, and changing the global climate. The most significant contributor is the burning of fossil fuels for transportation, electricity generation, and other purposes, which introduces large amounts of carbon dioxide and other GHGs into the atmosphere. Collectively, these gases intensify the natural greenhouse effect, causing global average surface and lower atmospheric temperatures to rise, a phenomenon known as global climate change. (WRCOG CAP, p. 1-4). The most common GHG is carbon dioxide (CO<sub>2</sub>), which constitutes approximately 83 percent of all GHG emissions in California (CARB 2018).

### Greenhouse Gases

Gases responsible for global climate change in the Basin and their relative contribution to the overall warming effect are CO<sub>2</sub> (55 percent), chlorofluorocarbons (CFCs) (24 percent), methane (CH<sub>4</sub>) (15 percent), and nitrous oxide (N<sub>2</sub>O) (6 percent). It is widely accepted that continued increases in GHG will contribute to global climate change although there is uncertainty concerning the magnitude and timing of future emissions and the resultant warming trend. (SCAQMD 2005, p. 1-8).

“Stratospheric ozone depletion” refers to the slow destruction of naturally occurring ozone, which lies in the upper atmosphere (called the stratosphere) and which protects Earth from the damaging effects of solar ultraviolet radiation. Certain compounds, including CFCs, halons, carbon tetrachloride, methyl chloroform, and other halogenated compounds, accumulate in the lower atmosphere and then gradually migrate into the stratosphere. In the stratosphere, these compounds participate in complex chemical reactions to destroy the upper ozone layer. Destruction of the ozone layer increases the penetration of ultraviolet radiation to the Earth’s surface, a known risk factor that can increase the incidence of skin cancers and cataracts, contribute to crop, and fish damage, and further degrade air quality. (SCAQMD 2005, p. 1-8).

GHG and ozone-depleting gases include, but are not limited to, the following (SCAQMD 2005, pp. 1-8 – 1-9):

- **Carbon dioxide** – Carbon dioxide results from fossil fuel combustion in stationary and mobile sources. It contributes to the greenhouse effect, but not to stratospheric ozone depletion. In the Basin, approximately 48 percent of carbon dioxide emissions come from

transportation, residential and utility sources which contribute approximately 13 percent each, 20 percent come from industry, and the remainder comes from a variety of other sources.

- **Methane** – Atmospheric methane is emitted from both non-biogenic and biogenic sources. Non-biogenic sources include fossil fuel mining and burning, biomass burning, waste treatment, geologic sources, and leaks in natural gas pipelines. Biogenic sources include wetlands, rice agriculture, livestock, landfills, forest, oceans, and termites. Methane sources can also be divided into anthropogenic and natural. Anthropogenic sources include rice agriculture, livestock, landfills, waste treatment, some biomass burning, and fossil fuel combustion. Natural sources are wetlands, oceans, forests, fire, termites, and geological sources. Anthropogenic sources currently account for more than 60 percent of the total global emissions. It is a greenhouse gas and traps heat 40–70 times more effectively than carbon dioxide. In the Basin, more than 50 percent of human-induced methane emissions come from natural gas pipelines, while landfills contribute 24 percent. Methane emissions from landfills are reduced by SCAQMD Rule 1150.1 – Control of Gaseous Emissions from Active Landfills. Methane emissions from petroleum sources are reduced by a number of rules in SCAQMD Regulation XI that control fugitive emissions from petroleum production, refining, and distribution.
- **Other regulated greenhouse gases include Nitrous Oxide, Sulfur Hexafluoride, Hydrofluorocarbons, and Perfluorocarbons<sup>1</sup>** – These gases all possess heat-trapping potentials hundreds to thousands of times more effective than carbon dioxide. Emission sources of nitrous oxide gases include, but are not limited to, waste combustion, wastewater treatment, fossil fuel combustion, and fertilizer production. Because the volume of emissions is small, the net effect of nitrous oxide emissions relative to carbon dioxide or methane is relatively small. Sulfur hexafluoride, hydrofluorocarbon, and perfluorocarbon emissions occur at even lower rates.
- **Chlorofluorocarbons** – Chlorofluorocarbons (CFCs) are emitted from blowing agents used in producing foam insulation. They are also used in air conditioners and refrigerators and as solvents to clean electronic microcircuits. CFCs are primary contributors to stratospheric ozone depletion and to global warming. Sixty-three percent of CFC emissions in the South Coast Air Basin come from the industrial sector. Federal regulations require service practices that maximize recycling of ozone-depleting compounds (both CFCs, hydrochlorofluorocarbons and their blends) during the servicing and disposal of air-conditioning and refrigeration equipment. SCAQMD Rule 1415 – Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems requires CFC refrigerants to be reclaimed or recycled from stationary refrigeration and air conditioning systems. SCAQMD Rule 1405 – Control of Ethylene Oxide and Chlorofluorocarbon Emissions from Sterilization or Fumigant Processes requires recovery of reclamation of CFCs at certain commercial facilities and eliminates the use of some CFCs in the sterilization processes. Some CFCs are classified as TACs and regulated by SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants and SCAQMD Rule 1402 Control of Toxic Air Contaminants from Existing Sources.
- **Halons** – These compounds are used in fire extinguishers and behave as both ozone-depleting and GHG. Halon production ended in the United States in 1993. SCAQMD Rule 1418 – Halon Emissions from Fire Extinguishing Equipment requires the recovery and

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1. <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>

recycling of halons used in fire extinguishing systems and prohibits the sale of halon in small fire extinguishers.

- **Hydro-chlorofluorocarbons** – HCFCs are solvents, similar in use and chemical composition to CFCs. The hydrogen component makes HCFCs more chemically reactive than CFCs, allowing them to break down more quickly in the atmosphere. These compounds deplete the stratospheric ozone layer, but to a much lesser extent than CFCs. HCFCs are regulated under the same SCAQMD rules as CFCs.
- **1,1,1-trichloroethane (TCA)** – TCA (methyl chloroform) is a solvent and cleaning agent commonly used by manufacturers. It is less destructive on the environment than CFCs or HCFCs, but its continued use will contribute to global warming and ozone depletion. 1,1,1-trichloroethane (TCA) is a synthetic chemical that does not occur naturally in the environment. No TCA is supposed to be manufactured for domestic use in the United States after January 1, 2002 because it affects the ozone layer. TCA had many industrial and household uses, including use as a solvent to dissolve other substances, such as glues and paints; to remove oil or grease from manufactured metal parts; and as an ingredient of household products such as spot cleaners, glues, and aerosol sprays. SCAQMD regulates this compound as a toxic air contaminant under Rules 1401 and 1402.

*Global Warming Potentials*

Individual GHGs have varying global warming potential and atmospheric lifetimes. The Intergovernmental Panel on Climate Change (IPCC) developed the Global Warming Potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of individual GHGs is determined through a comparison with the GWP of CO<sub>2</sub>. For example, CO<sub>2</sub> has a GWP of one (since we are using CO<sub>2</sub> to compare other gases), and CH<sub>4</sub> has a GWP of 28 (over a 100-year time period), meaning that on a molecule by molecule basis, CH<sub>4</sub> has 28 times the global warming potential of CO<sub>2</sub> over a 100-year time period (IPCC 2013, pp. 710-714). CO<sub>2</sub>-equivalents (CO<sub>2</sub>E) are the emissions of GHG multiplied by the GWP. The CalEEMod program calculates the CO<sub>2</sub>E based on the GWPs reported in the IPCC Fifth Assessment Report (IPCC 2013). **Table 5.5-A, Global Warming Potentials and Atmospheric Lifetimes** shows the GWP and atmospheric lifetimes of various GHGs with relatively long atmospheric lifetimes from the IPCC 2013 report.

**Table 5.5-A, Global Warming Potentials and Atmospheric Lifetimes**

Gas	Atmospheric Lifetime	Global Warming Potential (100 Year Time Horizon)
Carbon Dioxide (CO <sub>2</sub> )	--	1
Methane (CH <sub>4</sub> )	12.4	28-34
Nitrous Oxide (N <sub>2</sub> O)	121	265-298
Hydrofluorocarbons (HFCs) HFC-134a	13.4	1,300-1,550
Perfluoromethane (CF <sub>4</sub> )	50,000	6,630-7,350
Chlorofluorocarbons (CFC) CFC-11	45	4,660-5,350

Source: IPCC 2013, Table 8.7



## ***Effects of Climate Change***

### ***Agriculture***

Global climate change can cause drought, higher temperatures, saltwater contamination through rising sea levels, flooding, and increased risk of pests. Because California feeds not only its own residents, but the entire U.S. and other countries as well, production declines could lead to food shortages and higher prices. (OAG 2023)

### ***Forest and Biodiversity***

Forest and rangelands cover over 80% of California's 100 million acres. Climate change will affect tree survival and growth, reducing these lands' productivity and changing their habitats. In addition, climate change makes forests more vulnerable to fires by increasing temperatures and making forests and brush drier. Today's fire season in the western United States starts earlier, lasts longer, and is more intense than in the last several decades. Wildfire occurrence statewide could increase several fold by the end of the century, increasing fire suppression and emergency response costs and damage to property. (OAG 2023)

California is one of the most biologically diverse regions of the world, with the highest number of unique plant and animal species of all 50 states and the greatest number of endangered species. Climate change will adversely affect plant and wildlife habitats and the ability of the State's varied ecosystems to support clean water, wildlife, fish, timber and other goods and services. (OAG 2023)

### ***Public Health***

Californians already experience the worst air quality in the nation. Hotter temperatures lead to more smog, which can damage lungs, and increases childhood asthma, respiratory and heart disease, and death. Certain segments of the population are at greater risk, including the elderly, infants, persons with chronic heart or lung disease, people who cannot afford air conditioning, and those who work outdoors. As temperatures rise, the number of days of extreme heat events also will rise, causing increases in the risk of injury or death from dehydration, heatstroke, heart attack and respiratory problems. (OAG 2023)

### ***Sea Level Rise***

The sea level along California's coasts has risen nearly eight inches in the past century and is projected to rise by as much as 20 to 55 inches by the end of the century. A 55-inch sea level rise could put nearly half a million people at risk of flooding by 2100, and threaten property and infrastructure, including roadways, buildings, hazardous waste sites, power plants, and parks and tourist destinations. (OAG 2023)

As sea levels rise, saltwater contamination of the State's delta and levee systems will increase. Saltwater contamination of the Sacramento/San Joaquin Delta will threaten wildlife and the source of drinking water for 20 million Californians. Farmland in low areas may also be harmed by salt-contaminated water. (OAG 2023)

### ***Water Resources***

The Sierra Nevada snowpack functions as the most important natural reservoir of water in California. Under current conditions, the snowpack is created in fall and winter and slowly releases about 15 million acre-feet of water in the spring and summer, when California needs it most. California's dams and water storage facilities are built to handle the snow melt as it happened in the past. Higher temperatures are now causing the snowpack to melt earlier and all at once. Earlier and larger releases of water could overwhelm California's water storage facilities, creating risk of floods and water shortages. (OAG 2023)

## 5.5.2 Related Regulations

### International Regulations

#### *International Treaties and Other Developments*

The Kyoto Protocol is an international agreement linked to the United Nations Framework Convention on Climate Change. It was adopted in Kyoto, Japan, on December 11, 1997 and entered into force on February 16, 2005. The major feature of the Kyoto Protocol is that it commits its Parties (a number of industrialized countries; see page 20 of UN 1997 for a list of all Parties to the Kyoto Protocol) by setting internationally binding GHG emission reduction targets (UN Kyoto). The targets amount to an average of five percent reduction against 1990 levels over the five-year period 2008-2012 (UN 1997, p. 3). The major distinction between the Protocol and the Convention is that while the Convention encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so (UN 1997, p. 4). Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." (UN 1997, p. 9).

Negotiations after Kyoto have continued in an attempt to address the period after the first "commitment period" of the Kyoto Protocol, concluded at the end of 2012 (UN 1997, p. 3). In 2011, parties to the protocol agreed in principle to negotiate a new comprehensive and legally binding climate agreement by 2015 and to enter it into force for all parties starting from 2020. Negotiations took place under the Ad Hoc Group on the Durban Platform for Enhanced Action (UN ADP). Culminating in the adoption of the Paris Agreement by the Conference of the Parties on December 12, 2015 (UN 2015, p. 1 and 25). The Paris Agreement seeks to accelerate and intensify the actions and investment needed for a sustainable low carbon future. Its central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. (UN 2015, p. 3).

In accordance with Article 21, paragraph 1, of the Paris Agreement, the Agreement shall enter into force on the thirtieth day after the date on which at least 55 Parties to the Convention accounting in total for at least an estimated 55 percent of the total global greenhouse gas emissions have deposited their instruments of ratification, acceptance, approval or accession with the Depositary (the Secretary-General of the United Nations) (UN 2015, pp. 23-24). The Paris Agreement entered into force on November 4, 2016 (UN Paris). The United States ratified the Paris agreement on September 3, 2016 (UN 2019). In accordance with its article 20, the Agreement was open for signature at the United Nations Headquarters in New York from April 22, 2016 until April 21, 2017 by States and regional economic integration organizations that are Parties to the United Nations Framework Convention on Climate Change (UN 2015, p. 22). On June 1, 2017, President Donald Trump announced that he would withdraw the United States from the Paris Agreement (White House 2017). However, with President Biden's day one executive order, the United States rejoined the Paris Agreement on February 19, 2021. (EO 14008). State-wide and local efforts (discussed below) continue to promote and enforce regulations to reduce GHG emissions and meet the goals.

### Federal Regulations

Previously the United States Environmental Protection Agency (USEPA) had not regulated GHGs under the Clean Air Act (CAA) because it asserted that the Act did not authorize it to issue mandatory regulations to address global climate change and that such regulation would be unwise without an

unequivocally established causal link between GHGs and the increase in global surface air temperatures. In *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 (2007)) (MASS), however, the U.S. Supreme Court held that GHGs are pollutants under the CAA and directed the USEPA to decide whether the gases endangered public health or welfare. On December 7, 2009, the USEPA issued an Endangerment Finding under Section 202(a) of the CAA, opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the CAA. To date, the USEPA has not promulgated major regulations on GHG emissions, but it has begun to develop them.

The USEPA had also not moved aggressively to regulate GHGs because it expected Congress to make progress on GHG legislation, primarily from the standpoint of a cap-and-trade system. However, proposals circulated in both the House of Representative and Senate have been controversial and it may be some time before Congress adopts major climate change legislation. The USEPA's Endangerment Finding paves the way for federal regulation of GHGs with or without Congress. To date, Congress, under the Consolidated Appropriations Act of 2008 (HR 2764), has established mandatory GHG reporting requirements for some emitters of GHGs. On September 22, 2009, the USEPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the USEPA of GHG emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 MT or more a year of GHGs.

Regarding vehicle emission standards, in 2019, the National Highway Traffic Safety Administration (NHTSA) and USEPA amended certain existing Corporate Average Fuel Economy (café) and greenhouse gas emissions standards for passenger cars and light trucks and established new standards, covering model years 2021 through 2026. The rule also revoked California's ability to set its own, higher fuel efficiency standards, which are granted by waiver. California has filed two lawsuits against the USEPA over proposed amendments and repeal of the waiver. In May 2021, NHTSA proposed to repeal the amended standards, but the decision was not finalized. (NHTSA 2021) In March 2022, EPA's most recent decision, they rescinded the action to revoke California's ability to set its own higher fuel efficiency standards. This restored California's authority to implement its own GHG emissions standards. (NHTSA 2022)

### **Multi-State/Regional Area Regulations**

California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. CARB's Cap-and-Trade Program, is intended to link California and the other member states and provinces. As of January 1, 2014, California's Cap-and-Trade Program is linked to Quebec's pursuant to the Agreement Between the California Air Resources Board and the Government du Québec Concerning the Harmonization and Integration of Cap-and-Trade Programs Reducing Greenhouse Gas Emissions, in accordance with the direction in CARB's Resolution 13-7 (CARB 2013, p. 9). As of January 1, 2018, California's and Québec's Cap-and-Trade Programs will also be linked with Ontario's Cap-and-Trade Program (CARB 2017a), all three jurisdictions harmonizing their respective programs per their joint agreement (CARB 2017b).

### **State Regulations**

California has adopted various administrative initiatives and also enacted a variety of legislation relating to climate change, much of which sets aggressive goals for GHG emissions reductions within the state. However, none of this legislation provides definitive direction regarding the treatment of climate change in environmental review documents prepared under CEQA. In particular, the amendments to the CEQA Guidelines do not require or suggest specific methodologies for performing an assessment or thresholds



of significance, and do not specify GHG reduction mitigation measures. Instead, the CEQA amendments continue to rely on lead agencies to choose methodologies and make significance determinations based on substantial evidence, as discussed in further detail below (CNRA 2009a). In addition, no state agency has promulgated binding regulations for analyzing GHG emissions, determining their significance, or mitigating any significant effects in CEQA documents. Thus, lead agencies exercise their discretion determining how to analyze GHGs.

The discussion below provides a brief overview of the CARB and Office of Planning and Research (OPR) documents and of the primary legislation that relates to climate change that may affect the emissions associated with the proposed Project. It begins with an overview of the primary regulatory acts that have driven GHG regulation and analysis in California.

#### *Assembly Bill 32 and Senate Bill 32*

The California Global Warming Solutions Act of 2006 (AB 32) was signed into law in September 2006 after considerable study and expert testimony before the legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. The Act directed CARB to set a GHG emission limit based on 1990 levels to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner (AB 32). AB 32 was followed by Senate Bill 32 (SB 32) in 2016, which expanded this goal for statewide GHG emissions to be 40 percent below 1990 levels by 2030 (SB 32). AB 1279, signed into law September 2022, requires the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter. The bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels and directs CARB to work with relevant state agencies to achieve these goals.

In December 2008, CARB adopted a Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various categories of emissions. CARB determined that achieving the 1990 emission levels would require a reduction of GHG emissions of approximately 28.5 percent to achieve 2020 emissions levels in the absence of new laws and regulations (i.e. business as usual). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a Cap-and-Trade Program. The key elements of the Scoping Plan include: (CARB 2008, pp. ES-3 – ES-4)

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards,
- Achieving a statewide renewable energy mix of 33 percent,
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions,
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets,
- Adopting and implementing measures pursuant to existing state laws and policies including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard,

- Creating targeted fees including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

The CARB approved the final “First Update to the Climate Change Scoping Plan” in May 2014. The first update describes California’s progress towards AB 32 goals stating that “California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32” (CARB 2014, p. ES2). Specifically, “if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts [MW] of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050” (CARB 2014, p. 34). The first update laid the groundwork for the greenhouse gas emission goals set forth in Executive Order S-3-05 and B-16-2012 (CARB 2017c, p. 5), which set an objective for California to reduce greenhouse gas emissions to 80 percent below 1990 levels by 2050. (CARB 2014, p. 1).

CARB adopted a second update to the Scoping Plan in 2017 to reflect the 2030 target codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown’s Executive Order B-30-15. Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 million metric tons of carbon dioxide equivalent (million MTCO<sub>2</sub>E). The companion bill to SB 32, AB 197, provides additional direction to CARB on the following areas related to the adoption of strategies to reduce GHG emissions. (CARB 2017c, pp. 2-3):

- Requires annual posting of GHG, criteria, and toxic air contaminant data throughout the State, organized by local and sub-county level for stationary sources and by at least a county level for mobile sources.
- Requires CARB, when adopting rules and regulations to achieve emissions reductions and to protect the State’s most affected and disadvantaged communities, to consider the social costs of GHG emissions and prioritize both of the following:
  - Emissions reductions rules and regulations that result in direct GHG emissions reductions at large stationary sources of GHG emissions and direct emissions reductions from mobile sources.
  - Emissions reductions rules and regulations that result in direct GHG emissions reductions from sources other than those listed above.
- Directs CARB, in the development of each scoping plan, to identify for each emissions reduction measure:
  - The range of projected GHG emissions reductions that result from the measure.
  - The range of projected air pollution reductions that result from the measure.
  - The cost-effectiveness, including avoided social costs, of the measure.

CARB’s 2017 Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The 2017 Scoping Plan includes policies to require direct GHG reductions at some of the State’s largest stationary sources and mobile sources. These policies include

the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constrains and reduces emissions at covered sources. (CARB 2017c, pp. 5-6).

The CARB approved the most recent scoping plan update in December 2022 (CARB 2022a). CARB's 2022 Scoping Plan lays out the sector-by-sector roadmap for California to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. The previous Scoping Plans have focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. The 2022 Scoping Plan addresses recent legislation (AB 1279) and direction from the current Governor and extends and expands upon the earlier Scoping Plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The 2022 Scoping Plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan. Specifically, the 2022 Scoping Plan will:

- Identify a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identify technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focus on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrate equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporate the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Rely on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluate the substantial health and economic benefits of taking action.
- Identify key implementation actions to ensure success.

The 2022 Scoping Plan outlines how carbon neutrality can be achieved by taking measures to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's natural and working lands and using a variety of mechanical approaches. The actions and outcomes in the plan will achieve: significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

#### *Senate Bill 375 and SCAG Regional Transportation Plan/Sustainable Community Plan*

SB 375 provides for a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32 (SB 375). SB 375 includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 also requires Metropolitan Planning Organizations (MPOs) relevant to the Project area (including the Southern California Association of Governments (SCAG)) to incorporate a "sustainable communities strategy" (SCS) into their regional transportation plans (RTPs) that will achieve GHG emission reduction targets by reducing vehicle miles traveled (VMT) from light duty vehicles through development of more compact, complete, and efficient communities.



On September 23, 2010, CARB adopted Regional Targets for the reduction of GHG applying to the years 2020 and 2035 (CARB 2010). For the area under SCAG's jurisdiction including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035.

SCAG's SCS is included in the SCAG Connect SoCal (2020-2045 Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS) (SCAG 2020). CARB updated the regional targets in 2018 to ensure consistency with the more stringent statewide reduction goals subsequently introduced by the California legislature and the Governor's office. For the SCAG region, the updated targets are eight percent below 2005 per capita emissions levels by 2020 (this value is unchanged from the previous 2020 CARB target), and 19 percent below 2005 per capita emissions levels by 2035. (SCAG 2020, p. 138).

Connect SoCal SCS has been found to meet State targets for reducing GHG emissions from cars and light trucks. Connect SoCal achieves per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, and 19 percent in 2035, thereby meeting the GHG reduction targets established by the CARB for the SCAG region. (SCAG 2020, p. 138).

#### *Senate Bill 605*

On September 21, 2014, Governor Edmund Brown signed Senate Bill 605 (SB 605), which requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants (SLCP) in the state no later than January 1, 2016. As defined in the statute, SLCP means "an agent that has a relatively short lifetime in the atmosphere, from a few days to a few decades, and a warming influence on the climate that is more potent than that of carbon dioxide." SB 605, however, does not prescribe specific compounds as SLCP or add to the list of GHGs regulated under AB 32. In developing the strategy, CARB must complete an inventory of sources and emissions of SLCP in the state based on available data, identify research needs to address any data gaps, identify existing and potential new control measures to reduce emissions, and prioritize the development of new measures for SLCP that offer co-benefits by improving water quality or reducing other air pollutants that impact community health and benefit disadvantaged communities (SB 605). In March 2017, CARB approved the Short-Lived Climate Pollutants Reduction Strategy that lays out a range of options to reduce SLCP emissions in California, including regulations, incentives, and other market-supporting activities. The SLCP Strategy was also informed of the 2017 Scoping Plan (CARB 2017d).

#### *Senate Bill 97 (CEQA Guidelines)*

SB 97 required OPR to prepare amended CEQA Guidelines for submission to the California Natural Resources Agency (CNRA) regarding GHG analysis and feasible mitigation of the effects of GHG emissions as required by CEQA. These amendments became effective as of March 18, 2010 (CNRA SB 97). The State CEQA guidelines were also more recently amended as of December 2018; this amendment include several changes in State CEQA Guidelines Section 15064.4, which discusses determining the significance of impacts from GHG emissions, in order to reflect current case law on climate change analysis and help the public and policymakers understand a project's potential contribution to climate change. (CNRA 2018, pp. 17-20).

The current State CEQA Guidelines adopted pursuant to the 2010 and 2018 amendments state in Section 15064.4(a) that lead agencies should "make a good faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. State CEQA Guidelines Section 15064.4(a) notes that an agency may identify emissions by either quantifying the emissions or by relying on "qualitative analysis or other performance based standards."

State CEQA Guidelines Section 15064.4(b) provides that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment:

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, Section 15064.7(c) of the State CEQA Guidelines specifies that "[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence". Similarly, the 2010 revision to Appendix G, Environmental Checklist Form which is often used as a basis for lead agencies' selection of significance thresholds, does not prescribe specific thresholds (there were no revisions to the GHG emissions thresholds in the 2018 State CEQA Guideline amendments). Rather, Appendix G asks whether the project would conflict with a plan, policy, or regulation adopted to reduce GHG emissions or generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency.

Accordingly, the State CEQA Guidelines Section 15064 do not prescribe specific methodologies for performing an assessment of GHG impacts, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, it emphasizes the lead agency's discretion to determine the appropriate thresholds of significance consistent with the manner in which other impact areas are handled in CEQA.

The State CEQA Guidelines Section 15126.4(c) indicate that lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to a project, these potential mitigation measures set forth in Section 15126.4(c), may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency's decision; (2) reductions in GHG emissions resulting from a project through implementation of project features or project design; (3) off-site measures, including offsets, to mitigate a project's emissions; (4) measures that sequester greenhouse gas; and (5) In the case of the adoption of a plan, such as a general plan, long range development plan, or plans for the reduction of greenhouse gas emissions, mitigation may include the identification of specific measures that may be implemented on a project-by-project basis. Mitigation may also include the incorporation of specific measures or policies found in an adopted ordinance or regulation that reduces the cumulative effect of emissions.

### *Energy-Related Sources*

#### **Renewable Portfolio Standards**

Established in 2002 under SB 1078, accelerated in 2006 under SB 107 and again in 2011 under SBX1-2, California's Renewable Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020 (SB 1078, SB 1368). The 33 percent standard is consistent with the RPS goal established in the Scoping Plan (CARB 2008). As interim measures, the RPS requires 20 percent of retail sales to be sourced from renewable energy by 2013 and 25 percent by 2016. Initially, the RPS provisions applied to investor-

owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS.

Senate Bill 350 (SB 350), signed in 2015, increased the RPS from 33 percent in 2020 to 50 percent by 2030 and will double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation by 2030. (CARB 2017c, p. 2)

Senate Bill 100 (SB 100) was subsequently signed in 2018 and directs the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and CARB to plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 also accelerates the RPS target to 50 percent by 2026 and to 60 percent by 2030. (SB-100)

### **Assembly Bill 1109**

Assembly Bill 1109 (AB 1109), the Lighting Efficiency and Toxic Reduction Act, required the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.

### **Senate Bill 350**

Senate Bill 350 (SB 350), signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are,

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.

### *Mobile Sources*

#### **Mobile Source Reductions (AB 1493)**

Assembly Bill 1493 ("the Pavley Standard" or AB 1493) required CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 through 2016. The bill also required the California Climate Action Registry to develop and adopt protocols for the reporting and certification of GHG emissions reductions from mobile sources for use by CARB in granting emission reduction credits. The bill authorizes CARB to grant emission reduction credits for reductions of GHG emissions prior to the date of enforcement of regulations, using model year 2000 as the starting point for reduction.

In 2004, CARB applied to the EPA for a waiver under the federal Clean Air Act to authorize implementation of these regulations. The waiver request was formally denied by the USEPA in December 2007 after California filed suit to prompt federal action. In January 2008, the State Attorney General filed a new lawsuit against the EPA for denying California's request for a waiver to regulate and limit GHG emissions from these vehicles. In January 2009, President Barack Obama issued a directive to the EPA to reconsider California's request for a waiver. On June 30, 2009, the EPA granted the waiver to California for its GHG emission standards for motor vehicles. As part of this waiver, EPA specified the following provision: CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by a manufacturer for the 2009 model year. CARB has adopted a new approach to passenger vehicles (cars and light trucks) by combining the control of smog-causing



pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California. These standards will apply to all passenger and light duty trucks used by customers, employees of and deliveries to the proposed Project.

### **Low Carbon Fuel Standard**

Executive Order S-01-07 was signed on January 18, 2007, the Low Carbon Fuel Standard (LCFS) and mandated a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In 2009, CARB adopted the LCFS and began implementation on January 1, 2011.

CARB approved some amendments to the LCFS in December 2011, which were implemented on January 1, 2013. In September 2015, the Board approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In 2018, the Board approved amendments to the regulation, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector. (CARB 2023a).

### **Advanced Clean Cars**

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025.

The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

The program also requires car manufacturers to offer for sale an increasing number of zero-emission vehicles (ZEVs) each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles.

In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017-2025 through compliance with the EPA GHG requirements for those same model years (CARB 2012). In 2022, the Advanced Clean Cars II program was approved, which will rapidly scale down light-duty passenger car, pickup truck and SUV emissions starting with the 2026 model year through 2035. By 2035 all new passenger cars, trucks and SUVs sold in California will have zero emissions. (CARB 2022b)

### **Transportation Fuel: Phased-In Cap-and-Trade Compliance Obligation**

Pursuant to AB 32, CARB was allowed, but not required, to include among mechanisms intended to reduce GHG emissions a "system of market-based declining annual aggregate emission limits." As noted above, CARB developed a Scoping Plan that directed CARB staff to develop, among other programs, a cap-and-trade mechanism that would apply a declining aggregate cap on GHG emissions and provide a flexible compliance system using tradable instruments. On October 20, 2011, CARB adopted the final cap-and-trade regulation (CCR Title 17, Subchapter 10, Article 5). The program will impose a "cap" on the total GHG emissions from covered entities in the state and the quantity of emissions allowed under the cap will decrease each year, ultimately reaching the goal of returning state-wide GHG emissions to 1990 levels by 2020. The quantity of allowed emissions actually increases between 2014 and 2015, but that is to account for the addition of the fuel importers and distributors and

additional electricity importers to the program as discussed below. The net effect is to reduce overall GHG emissions.

The Cap-and-Trade Program started on January 1, 2012 and will proceed in “compliance phases,” the first of which began on January 1, 2013. In the first phase, the program applies to electric utilities, importers of electricity, and specified industries, including refineries. Approximately 350 electric utilities and approximately 600 industrial facilities were included in the initial phase of the program. In 2015, importers and distributors of fossil fuels were added to the program in the second phase. Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blend stock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tonnes or more of CO<sub>2</sub>e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California. Phasing in of cap-and-trade compliance obligations for transportation fuel providers further reduces GHG emissions attributable to mobile sources, beyond the GHG emissions reductions achieved by the Pavley Standard, LCFS, and Advanced Clean Cars Program discussed above. This analysis does not incorporate GHG emissions reductions based on cap-and-trade compliance obligations applicable to transportation fuel suppliers.

### *Building Standards*

#### **California Energy Code (California Code of Regulations, Title 24)**

The California Energy Code (CCR Title 24, Part 6) was established in 1978 to reduce California’s energy consumption. Energy use standards in the code, referred to as Building Energy Efficiency Standards, are updated on an approximately three-year cycle (CEC Standards).

These efficiency standards (commonly referred to as Title 24 standards) apply to newly constructed buildings and additions and alterations to existing buildings. (CEC 2022). They are designed to reduce wasteful, uneconomic, inefficient, or unnecessary consumption of energy, and enhance outdoor and indoor environmental quality. The current 2022 Building Energy Efficiency Standards, which went into effect January 1, 2023, focuses on four key areas in new construction of homes and business by encouraging 1) electric heat pump technology and use, 2) establishing electric-ready requirements when natural gas is installed, 3) expanding solar photovoltaic (PV) system and battery storage standards, and 4) strengthening ventilation standards to improve indoor air quality. Specifically, the 2022 updates require all new homes be electric-ready. That means buildings with gas stoves have electrical panels and wiring to support a switch to electric stoves. Further advancements and cost reductions will continue to expand electric options for heating, cooking, laundering, and electric vehicle (EV) charging to meet all Californians’ needs. (CEC 2022) The Project will be subject to the Title 24 Standards in effect at the time of building permits.

It is projected that the 2022 building efficiency standards will reduce 10 million metric tons of GHGs over 30 years. This reduction is equivalent to taking nearly 2.2 million cars off the road for a year. (CEC 2022)

California’s Appliance Efficiency Regulations (CCR Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. (CEC Title 20)

### **Green Building Standards**

Part 11 of the California Green Building Standards Code in Title 24 of the CCR is also known as the CALGreen Code. The development of the CALGreen Code is intended to: (1) cause a reduction in greenhouse gas emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor.

The CALGreen Code requires waste reduction measures including: providing readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of nonhazardous materials for recycling, and a minimum 65 percent diversion of construction and demolition waste from landfills. Water reduction measures include: separate water meters for buildings in excess of 50,000 square feet; moisture-sensing irrigation systems for larger landscaped areas; and the reduction of generation of wastewater by either installing water-conserving fixtures or using non-potable water systems. Pollution reduction measures include requiring low-pollutant emitting interior finish materials such as paints, carpet, vinyl flooring, and particleboard.

The 2022 CALGreen Code (CCR, Title 24, Part 11) became effective January 1, 2023. (CBSC 2022). Specific sections of the CALGreen Code that are applicable to this Project include, but are not limited to:

#### ***Non-Residential***

*CALGreen Section 5.106.4: Bicycle parking. Comply with Sections 5.106.4.1 and 5.106.4.1.2 or meet local ordinance, whichever is stricter.*

5.106.4.1 Short-term bicycle parking. If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5 percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.

5.106.4.1.2 Long-term bicycle parking. For buildings with over 10 tenant-occupants, provide secure bicycle parking for 5 percent of motorized vehicle parking capacity, with a minimum of one space. Acceptable parking facilities shall be convenient from the street and may include: 1. Covered, lockable enclosures with permanently anchored racks for bicycles; 2. Lockable bicycle rooms with permanently anchored racks; and 3. Lockable, permanently anchored bicycle lockers. Note: Additional information on recommended bicycle accommodations may be obtained from Sacramento Area Bicycle Advocates.

*CALGreen Section 5.106.5.3: Construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with Section 5.106.5.3.1 and shall be provided in accordance with regulations in the California Building Code and the California Electrical Code.*

5.106.5.3.1 Electric Vehicle (EV) Capable spaces shall be provided in accordance with Table 5.106.5.3.1 (provided below) and the following requirements:

1. Raceways complying with the California Electrical Code and no less than 1-inch (25 mm) diameter shall be provided and shall originate at a service panel or subpanel(s) serving the area and shall terminate in close proximity to the proposed location of the EV Capable space and into a suitable listed cabinet, box, enclosure or equivalent. A common raceway may be used to serve multiple EV capable spaces.
2. A service panel or subpanel(s) shall be provided with panel space and electrical load capacity dedicated 208/240 volt, 40-ampere minimum branch circuit for each EV



- capable space, with delivery of 30-ampere minimum to an installed Electrical Vehicle Supply Equipment (EVSE) at each Electric Vehicle Charging Station (EVCS)
3. The electrical system and any on-site distribution transformers shall have sufficient capacity to supply full rated amperage at each EV capable space.
  4. The service panel or subpanel circuit directory shall identify the reserved overcurrent protective device space(s) as “EV CAPABLE.” The raceway termination location shall be permanently and visibly marked as “EV CAPABLE.”

CALGreen Code Table 5.106.5.3.1 shows the number of parking spaces required EV Capable Spaces and the number of EV Capable Spaces provided with EVSE. **Table 5.5-B, CALGreen Code Electric Vehicle Charging Space Calculation**, is reflected below.

**Table 5.5-B, CALGreen Code Electric Vehicle Charging Space Calculation**

Total Number of Actual Parking Spaces	Number of Required Capable Spaces	Number of EVCS
0-9	0	0
10-25	4	0
26-50	8	2
51-75	13	3
76-100	17	4
101-150	25	6
151-200	35	9
201 and over	20 percent of total <sup>1</sup>	25 percent of EV capable spaces <sup>1</sup>
Source: CBSC 2022		
<b>Notes:</b>		
1. Calculation for spaces shall be rounded up to the nearest whole number.		

*CALGreen Section 5.106.5.4: EV charging: medium-duty and heavy-duty.* Construction shall comply with Section 5.106.5.4.1 to facilitate future installation of EVSE. Construction for warehouses, grocery stores and retail stores with planned off-street loading spaces shall also comply with Section 5.106.5.4.1 for future installation of medium- and heavy-duty EVSE.

- 5.106.5.4.1 EV charging readiness requirements for warehouses, grocery stores and retail stores with planned off-street loading spaces. In order to avoid future demolition when adding EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s) or subpanel(s) shall be installed at the time of construction in accordance with the *California Electrical Code*. Construction plans and specifications shall include, but are not limited to, the following:
  1. The transformer, main service equipment and subpanels shall meet the minimum power requirement in Table 5.106.5.4.1 to accommodate the dedicated branch circuits for the future installation of EVSE.
  2. The construction documents shall indicate one or more location(s) convenient to the planned off-street loading space(s) reserved for medium- and heavy-duty ZEV charging cabinets and charging dispensers, and a pathway reserved for routing of conduit from

- the termination of the raceway(s) or busway(s) to the charging cabinet(s) and dispenser(s), as shown in Table 5.106.5.4.1.
3. Raceway(s) or busway(s) originating at a main service panel or a subpanel(s) serving the area where the potential future medium- and heavy-duty EVSE will be located and shall terminate in close proximity to the potential future location of the charging equipment for medium- and heavy-duty vehicles.
  4. The raceway(s) or busway(s) shall be of sufficient size to carry the minimum additional service load to the future location of the charging for medium- and heavy-duty ZEVs as shown in Table 5.106.5.4.1.

CALGreen Code Table 5.106.5.3.1 shows the raceway conduit and panel power requirements for medium- and heavy-duty EVSE. **Table 5.5-C, CALGreen Code Requirements for Medium- and Heavy-Duty EVSE**, is reflected below.

**Table 5.5-C, CALGreen Code Requirements for Medium- and Heavy-Duty EVSE**

Building Type	Building Size (SQ. FT)	Number of Off-Street Loading Spaces	Additional Capacity Required (KVA) for Raceway & Busway and Transformer & Panel
Grocery	10,000 to 90,000	1 or 2	200
		3 or Greater	400
	Greater than 90,000	1 or Greater	400
Retail	10,000 to 135,000	1 or 2	200
		3 or Greater	400
	Greater than 135,000	1 or Greater	400
Warehouse	20,000 to 256,000	1 or 2	200
		3 or Greater	400
	Greater than 256,000	1 or Greater	400

Source: CBSC 2022

**CALGreen Section 5.504.5.3: Filters.** In mechanically ventilated buildings, provide regularly occupied areas of the building with air filtration media for outside and return air that provides at least a Minimum Efficiency Reporting Value (MERV) of 13. MERV 13 filters shall be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual.

**Residential**

**CALGreen Section 4.106.4:** EV charging for new construction. New construction shall comply with Sections 4.106.4.1 or 4.106.4.2 to facilitate future installation and use of EV chargers. EVSE shall be installed in accordance with the *California Electrical Code*.

4.106.4.1 New one- and two-family dwellings and townhouses with attached private garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or subpanel and shall terminate into a listed cabinet, box, or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible, or concealed areas and spaces. The service panel and/or

subpanel shall provide capacity to install a 40-ampere 208/240-volt minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.

4.106.4.2 New multifamily dwellings, hotels, and motels and new residential parking facilities. When parking is provided parking spaces for new multifamily dwellings, hotels and motels shall meet the requirements of Section 4.106.4.2.1 and 4.106.4.2.2. Calculations for spaces shall be rounded up to the nearest whole number. A parking space served by electric vehicle supply equipment or designed as a future EV charging space shall count as at least one standard automobile parking space only for purpose of complying with any applicable minimum parking space requirements established by a local jurisdiction. See Vehicle Code Section 22511.2 for further details.

4.106.4.2.1 Multifamily development projects with less than 20 dwelling units; and hotels and motels with less than 20 sleeping units or guest rooms. The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.

1. EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as “EV CAPABLE” in accordance with the *California Electrical Code*.
2. EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.

4.106.4.2.2 Multifamily development projects with 20 or more dwelling units, hotels, and motels with 20 or more sleeping units or guest rooms. The number of dwelling units, sleeping units or guest rooms shall be based on all buildings on a project site subject to this section.

1. EV Capable. Ten (10) percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE. Electrical load calculations shall demonstrate that the electrical panel service capacity and electrical system, including any on-site distribution transformer(s), have sufficient capacity to simultaneously charge all EVs at all required EV spaces at a minimum of 40 amperes. The service panel or subpanel circuit directory shall identify the overcurrent protective device space(s) reserved for future EV charging purposes as “EV CAPABLE” in accordance with the *California Electrical Code*.
2. EV Ready. Twenty-five (25) percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. For multifamily parking facilities, no more than one receptacle is required per dwelling unit when more than one parking space is provided for use by a single dwelling unit.
3. EV Chargers. Five (5) percent of the total number of parking spaces shall be equipped with Level 2 EVSE. Where common use parking is provided, at least one EV charger



shall be located in the common use parking area and shall be available for use by all residents or guests.

When low power Level 2 EV charging receptacles or Level 2 EVSE are installed beyond the minimum required, an automatic load management system (ALMS) may be used to reduce the maximum required electrical capacity to each space served by the ALMS. The electrical system and any on-site distribution transformers shall have sufficient capacity to deliver at least 3.3 kW simultaneously to each EV charging station (EVCS) served by the ALMS. The branch circuit shall have a minimum capacity of 40 amperes and installed EVSE shall have a capacity of not less than 30 amperes. ALMS shall not be used to reduce the minimum required electrical capacity to the required EV capable spaces.

4.106.4.2.2.1 Electric vehicle charging stations (EVCS). Electric vehicle charging stations required by Section 4.106.4.2.2.1.2 Item 3, shall comply with Section 4.106.4.2.2.1.1.

4.106.4.2.2.1.1 Location. EVCS shall comply with at least one of the following options:

1. The charging space shall be located adjacent to an accessible parking space meeting the requirements of the California Building Code, Chapter 11A, to allow use of the EV charger from the accessible parking space.
2. The charging space shall be located on an accessible route, as defined in the *California Building Code*, Chapter 2, to the building.

### *Waste Diversion*

#### **California Integrated Waste Management Act of 1989**

The California Integrated Waste Management Act of 1989 (Public Resources Code Sections 40000 et seq.) requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.<sup>2</sup> Additionally, jurisdictions are not prohibited from implementing source reduction, recycling, and composting activities designed to exceed these requirements.<sup>3</sup>

AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.<sup>4</sup> In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal.<sup>5</sup>

### *Other Potentially Applicable State Regulations or Policies*

#### **Executive Order S-13-08**

On November 14, 2008, Governor Arnold Schwarzenegger signed Executive Order S-13-08 which called on state agencies to develop a strategy for identification of and preparation for expected climate change impacts in California. The resulting 2009 California Climate Adaptation Strategy (CAS) report was developed by the CNRA in coordination with the Climate Action Team (CAT). The report presents the

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2 Cal. Pub. Res. Code § 41780(a).

3 Cal. Pub. Res. Code § 41780(b).

4 Cal. Pub. Res. Code § 41780.01(a).

5 Cal. Pub. Res. Code § 41780.02.

best available science relevant to climate impacts in California and proposes a set of recommendations for California decision-makers to assess vulnerability and promote resiliency in order to reduce California's vulnerability to climate change. Guidance regarding adaptation strategies is general in nature and emphasizes incorporation of strategies into existing planning policies and processes.

In addition to requiring the CAT to create a Climate Adaptation Strategy, Executive Order S-13-08 ordered the creation of a comprehensive Sea Level Rise Assessment Report. The report, published in June 2012, indicates that the sea level along most of California's coast is expected to rise about one meter over the next century and is likely to increase the risk of damage in the form of flooding, coastal erosion, and wetland loss due to storm surges and high waves. The sea level increase is slightly higher than projected for global sea levels (NRC, 2012; ONPI 2012).

Executive Order S-13-08 also called for the California Ocean Protection Council (OPC) to work with the other CAT State agencies to develop interim guidance for assessing the potential impacts of sea level rise due to climate change in California. In coordination with National Academy of Sciences (NAS) efforts, the OPC drafted interim guidance recommending that state agencies consider a range of sea level rise scenarios for the years 2050 and 2100 in order to assess project vulnerability, reduce expected risks, and increase resiliency to sea level rise. The draft resolution and interim guidance document is consistent with the Ocean Protection Act (Division 26.5, Public Resource Code Section 3561 5(a)(1)), which specifically directs the OPC to coordinate activities of state agencies to improve the effectiveness of state efforts to protect ocean resources. An update to the 2009 CAS report, the final "Safeguarding California Plan," was published in July 2014.<sup>6</sup>

#### **Senate Bill X7-7 (Water Conservation Act of 2009)**

The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state was required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convey, treat, and distribute the water and it also reduces emissions from wastewater treatment.

The Department of Water Resources adopted a regulation on February 16, 2011 that sets forth criteria and methods for exclusion of industrial process water from the calculation of gross water use for purposes of urban water management planning. The regulation would apply to all urban retail water suppliers required to submit an Urban Water Management Plan, as set forth in the Water Code, Division 6, Part 2.6, Sections 10617 and 10620.

#### **Model Water Efficient Landscape Ordinance**

The Model Water Efficient Landscape Ordinance (Ordinance) was required by AB 1881, the Water Conservation Act. The bill required local agencies to adopt a local landscape ordinance at least as effective in conserving water as the Model Ordinance by January 1, 2010. Reductions in water use of 20 percent consistent with (SBX7-7) 2020 mandate are expected upon compliance with the Ordinance. Governor Brown's Drought Executive Order of April 1, 2015 (EO B-29-15) directed DWR to update the Ordinance through expedited regulation. The California Water Commission approved the revised Ordinance, which became effective December 15, 2015. New development projects that include landscape areas of 500 square feet or more are subject to the Ordinance. The update requires: more efficient irrigation systems; incentives for graywater usage; improvements in on-site stormwater capture;

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<sup>6</sup> State of California, [http://resources.ca.gov/docs/climate/Final\\_Safeguarding\\_CA\\_Plan\\_July\\_31\\_2014.pdf](http://resources.ca.gov/docs/climate/Final_Safeguarding_CA_Plan_July_31_2014.pdf).

limiting the portion of landscapes that can be planted with high water use plants; and reporting requirements for local agencies.

The City of Riverside has codified landscaping and irrigation requirements under Water Efficient Landscaping and Irrigation in Title 19, Chapter 19.570 of the City Municipal Code.

### **CARB Refrigerant Management Program**

CARB adopted a regulation in 2009 to reduce refrigerant GHG emissions from stationary sources through refrigerant leak detection and monitoring, leak repair, system retirement and retrofitting, reporting and recordkeeping, and proper refrigerant cylinder use, sale, and disposal. The regulation is set forth in sections 95380 to 95398 of Title 17, California Code of Regulations. The rules implementing the regulation establish a limit on statewide GHG emissions from stationary facilities with refrigeration systems with more than 50 pounds of a high GWP refrigerant. The refrigerant management program is designed to (1) reduce emissions of high-GWP GHG refrigerants from leaky stationary, non-residential refrigeration equipment; (2) reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances using high-GWP refrigerants; and (3) verify GHG emission reductions.

### **Regional Regulations**

#### *South Coast Air Quality Management District*

SCAQMD is principally responsible for comprehensive air pollution control for Los Angeles, Orange, and the urbanized portions of Riverside and San Bernardino Counties, including the Project site. SCAQMD works directly with SCAG, County transportation commissions and local governments, and cooperates actively with all federal and state government agencies to regulate air quality.

In April 2008, SCAQMD convened a Working Group to develop GHG significance thresholds. On December 5, 2008, SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold for projects where SCAQMD is the lead agency. As to all other projects where SCAQMD is not the lead agency, the Board has, to date, only adopted an interim threshold of 10,000 MTCO<sub>2</sub>E per year for industrial stationary source projects (SCAQMD 2008).

For all other projects, SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions; Tier 2 is consistency with a GHG reduction plan; Tier 3 is a screening value or bright line; Tier 4 is a performance based standard; and Tier 5 is GHG mitigation offsets (SCAQMD 2008).

According to the presentation given at the September 28, 2010 Working Group meeting, SCAQMD staff proposed a Tier 3 draft thresholds for residential, commercial, and mixed-use projects at 3,500, 1,400, and 3,000 MTCO<sub>2</sub>E/yr, respectively. Alternatively, a lead agency has the option to use 3,000 MTCO<sub>2</sub>E/yr as a threshold for all non-industrial projects. Although both options are recommended by SCAQMD, a lead agency is advised to use only one option and to use it consistently.. For the Tier 4 draft threshold, SCAQMD staff presented a percent emission reduction target option but did not provide any specific recommendation for a percent emission reduction target; instead, it referenced the San Joaquin Valley Air Pollution Control District (SJVAPCD) approach. The percent reduction target is based on consistency with AB 32 as it was based on the same numeric reductions calculated in the Scoping Plan to reach 1990 levels by 2020. The second Tier 4 option is to utilize an efficiency target for 2020 and 2035 of 4.8 and 3.0 metric tons per service population per year for project level thresholds (SCAQMD 2010).



The Working Group has not convened since the fall of 2010. As of October 2023, the proposal has not been considered or approved for use by SCAQMD's Board. In the meantime, no GHG significance thresholds are approved for use in the Basin.

### **Local Regulations**

#### *City of Riverside 2025 General Plan*

The City of Riverside 2025 General Plan contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. A-35, A-36, A-38; OS-54 – OS-55; PF-28):

#### ***Air Quality Element***

- |                |  |
|----------------|--|
| Objective AQ-1 | Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic. |
| Policy AQ-1.5  | Encourage infill development projects within urbanized areas, which include job centers and transportation nodes.  |
| Policy AQ-1.7  | Support appropriate planned residential developments and infill housing, which reduce vehicle trips.   |
| Objective AQ-5 | Increase energy efficiency and conservation in an effort to reduce air pollution.  |
| Policy AQ-5.1  | Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste disposed of in landfills.  |
| Policy AQ-5.3  | Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.  |
| Policy AQ-5.6  | Support the use of automated equipment for conditioned facilities to control heating and air conditioning.   |
| Policy AQ-5.7  | Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.   |
| Objective AQ-8 | Make sustainability and global warming education a priority for the City's effort to protect public health and achieve state and federal clean air standards.  |
| Policy AQ-8.17 | Develop measures to encourage that a minimum of 40% of the waste from all construction sites throughout Riverside be recycled by the end of 2008.  |

#### ***Open Space & Conservation Element***

- |               |   |
|---------------|---|
| Policy OS-8.2 | Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24 and encourage the installation of conservation devices in existing developments. |
| Policy OS-8.3 | Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources.  |

Policy OS-8.4	Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities.
Policy OS-8.5	Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools).
Policy OS-8.6	Require all new development to incorporate energy efficient lighting, heating, and cooling systems pursuant to the Uniform Building Code and Title 24.
Policy OS-8.7	Encourage mixed use development as a means of reducing the need for auto travel.
Policy OS-8.10	Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.
Policy OS-8.12	Require bicycle parking in new non-residential development.

***Public Facilities and Infrastructure Element***

Objective PF-6	Provide affordable, reliable, and, to the extent practical, environmentally sensitive energy resources to residents and businesses.
Policy PF-6.3	Promote and encourage energy conservation.
Policy PF-6.4	Encourage energy-efficient development through its site plan and building design standard guidelines.
Policy PF-6.5	Promote green building design.

*City of Riverside 2025 General Plan EIR*

The are no applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to Greenhouse Gas Emissions.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.

*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUI EIR that pertain to the proposed Project.

*City of Riverside Municipal Code*

The following sections of the City's Municipal Code are applicable and pertain to GHG emissions:

**Chapter 16.26 – Electrification of New Buildings.** The City requires building electrification in certain newly constructed buildings. New building permits filed after January 6, 2023 for buildings three stories or less require electrification and buildings four or more stories are subject to this requirement in January 2026.

**Chapter 19.570 – Water Efficient Landscaping and Irrigation.** The City has codified landscaping and irrigation requirements to increase water use efficiency and promote the use of recycled water.

*City of Riverside Restorative Growthprint*

The Riverside Restorative Growthprint, adopted January 2016, consists of the City’s Economic Prosperity Action Plan and Climate Action Plan (CAP), which work in conjunction to spur entrepreneurship and smart growth while advancing the City’s GHG emission reduction goals through the year 2035 (RRG). The CAP prioritizes the implementation of policies that enable the City to fulfill the requirements of State initiatives, Assembly Bill 32 and Senate Bill 375. The CAP includes a baseline GHG inventory for local government operations and for the community as a whole and establishes emission reduction targets consistent with State law. Through stakeholder engagement and cost-benefit analysis, the CAP resulted in strategies, measures, and actions for reducing emissions that align with the City’s planning priorities and its vision of a future economy based on clean, green businesses and business practices.

*Envision Riverside 2025, City of Riverside Strategic Plan*

The City’s 2025 Strategic Plan, known as Envision Riverside, identifies a clear vision for the future of Riverside’s Economy, Community and Environment. It is comprised of the City Council’s strategic policies and operational workplan to advance the City’s potential. One of the six priorities of Envision Riverside is Environmental Stewardship, with one of the major themes being Sustainability and Resiliency. Environmental Stewardship goals include: rapidly decreasing Riverside’s carbon footprint by acting urgently to reach a zero carbon electric grid with the goal of reaching 100% zero carbon electricity production by 2040 with continuing to ensure safe, reliable, and affordable energy for all residents; and implementing the requisite measures to achieve citywide carbon neutrality no later than 2040.

**5.5.3 Comments Received in Response to the Initial Study/Notice of Preparation**

No comments were received regarding greenhouse gas emissions in response to the Initial Study/Notice of Preparation (IS/NOP).

**5.5.4 Thresholds of Significance**

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State CEQA Guidelines. However, in the case for GHG emissions to be analyzed for the purpose of CEQA, the City of Riverside does use the 3,000 MTCO<sub>2</sub>E/yr threshold to determine significance, and hence will be used as the threshold for this Project.

As identified in the Initial Study (Appendix A) prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.



### 5.5.5 Project Design Features

The proposed Project will be designed and constructed to meet all applicable standards under CALGreen, Title 24, and Municipal Code 16.26 (Electrification of New Buildings), as described in Section 5.5.2, above. In particular, the Project will include the following design features:

- Rooftop and carport solar (PV) panels, consistent with the 2022 CALGreen code;
- Residential appliances installed by the developer will be Energy Star-rated; and
- Waste reduction program.

Where possible, these features have been quantified in the Project's GHG emissions estimates, as described in Section 5.5.7, below.

### 5.5.6 Methodology

The *Technical Memorandum – Air Quality/Greenhouse Gas Analysis for Arlington Mixed Use Development Project (WEBB-A)*, was prepared for the proposed Project by Albert A. Webb Associates dated October 27, 2023 (included as Appendix B). The methodology used within the analysis is consistent with draft guidance prepared by the South Coast Air Quality Management District (SCAQMD) for quantification of emissions and evaluation of potential impacts related to GHG emissions. As recommended by SCAQMD staff, the California Emissions Estimator Model (CalEEMod™) version 2022.1 program was used to quantify project-related emissions from short-term construction and long-term operation.

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CNRA has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (see CEQA Guidelines Section 15064(h)(3)). A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.

The City has not formally adopted a numerical significance threshold for assessing impacts related to GHG emissions. Nor have the SCAQMD, CARB, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. However, the City of Riverside utilizes the SCAQMD significance threshold of 3,000 MTCO<sub>2</sub>E/yr for non-industrial projects.

The analysis calculates the amount of GHG emissions that would be attributable to the project using recommended air quality model, as described above. The primary purpose of quantifying the project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there

would be a reduction in the project’s incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions.

### 5.5.7 Environmental Impacts

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

#### Short-Term Analysis

##### Construction-Related Emissions

The CalEEMod model calculates GHG emissions from fuel usage by construction equipment and construction-related activities, like construction worker trips, for the Project. CalEEMod also calculates the indirect GHG emissions related to electricity consumption. The CalEEMod output results for construction-related GHG emissions present the GHG emissions estimates for the Project for CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), refrigerants (R), and CO<sub>2</sub>e.<sup>7</sup> **Table 5.5-D, Project Construction Equipment GHG Emissions**, summarizes the GHG emissions estimates for the Project in metric tons/year (MT/yr).

**Table 5.5-D, Project Construction Equipment GHG Emissions**

Phase	Metric Tons per year (MT/yr)				
	Total CO <sub>2</sub>	Total CH <sub>4</sub>	Total N <sub>2</sub> O	Total R	Total CO <sub>2</sub> E
2024	436	0.02	0.03	0.48	446
2025	1,281.10	0.05	0.06	1.41	1,303.20
2026	388	0.01	0.02	0.46	394
<b>Total</b>	<b>2,105.10</b>	<b>0.08</b>	<b>0.11</b>	<b>2.35</b>	<b>2,143.20</b>
				<b>Amortized<sup>1</sup></b>	<b>71.44</b>
Source: WEBB-A, Table 6					
<b>Note:</b>					
1. Construction emissions were amortized over a 30-year period, as recommended by SCAQMD.					

Evaluation of **Table 5.5-D** indicates that an estimated 2,143.20 MTCO<sub>2</sub>E will occur from Project construction equipment over the course of the estimated construction period. Since the 2008 SCAQMD guidance document<sup>8</sup> recommends that construction emissions be amortized for a project lifetime of 30 years to ensure that GHG reduction measures address construction GHG emissions as part of the operational reduction strategies, the total GHG emissions from Project construction were amortized and are included in **Table 5.5-F, Total Unmitigated Project-Related Annual GHG Emissions**, below.

#### Long-Term Analysis

##### Area Source Emissions

CalEEMod estimates the GHG emissions associated with area sources which include landscape equipment emissions, architectural coating, consumer products, and hearths. Landscape equipment servicing the Project site create CO<sub>2</sub> resulting from fuel combustion based on the Project’s land uses. Consumer products consist of consumer use of solvents and personal care products and architectural

<sup>7</sup> CO<sub>2</sub>e is the sum of CO<sub>2</sub> emissions estimated plus the sum of CH<sub>4</sub>, N<sub>2</sub>O, and refrigerant emissions estimated multiplied by their respective global warming potential (GWP).

<sup>8</sup> [https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2](https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2)

coatings consist of an average building square footage to be repainted each year. Hearth emissions apply to dwelling units; however, no fireplaces are proposed within the residential uses. **Table 5.5-F** summarizes the Project’s area source emissions.

*Energy-Related Emissions*

CalEEMod estimates the GHG emissions associated with building electricity and natural gas usage (non-hearth) for each land use type. Electricity and natural gas used in buildings is typically generated at an off-site power plant which indirectly generates GHG emissions. The default energy usage values used in CalEEMod are based on the CEC sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies and reflect 2019 Title 24 improvements. As previously stated in *Section 5.5.2*, building electrification is required for the Project pursuant to the City’s municipal code (Chapter 16.26). Accordingly, CalEEMod mitigation measure E-15, which requires all electric development is incorporated as part of Project design as listed above in *Section 5.5.5*. However, CalEEMod only quantifies reductions from the residential land use for this measure. Therefore, the natural gas emissions are overstated in the analysis herein.

Additionally, as stated in *Section 5.5.5*, the Project design also includes energy star-rated appliances in the residential buildings. Therefore, the CalEEMod mitigation measure E-2 was incorporated as part of Project design for installation of energy star-rated, refrigerators, dishwashers, washing machines, and ceiling fans.

Finally, the Project will incorporate solar panels on rooftops and/or carports consistent with the 2022 California Green Building Code, as stated in *Section 5.5.5*. The energy production from the Project’s solar panels was not quantified, therefore providing a more conservative estimate in the analysis presented herein of the energy-related emissions. **Table 5.5-E, Energy-Related GHG Emissions**, summarizes the energy-related GHG emissions estimates reported by CalEEMod for the Project.

**Table 5.5-E, Energy-Related GHG Emissions**

Source	Metric Tons per year (MT/yr)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> E
Electricity	764.00	0.05	0.00	768.00
Natural Gas	19.70	0.00	0.00	19.70
<b>Total</b>	<b>783.70</b>	<b>0.05</b>	<b>0.00</b>	<b>787.70</b>
Source: WEBB-A, Table 7				
<b>Note:</b> Emissions reported are the sum of each Phase.				

*Mobile Source Emissions*

CalEEMod estimates the annual GHG emissions from Project-related vehicle usage based on trip generation data contained in defaults or in a project-specific traffic analysis. CalEEMod also estimates the GHG emissions from refrigerant leakage from vehicle air conditioning (A/C) systems. A Project-specific Traffic Impact Analysis (TIA) (included in Appendix F of the Draft EIR) was utilized for weekday trip rates and the most recent Institute of Traffic Engineers (ITE) Trip Generation Manual, 11th Edition, was used for weekend trip rates. CalEEMod defaults were utilized for pass-by and diverted trip types. The TIA’s internal capture trip reduction of approximately 22 percent was not applied to residential and supermarket trips to be conservative. In addition, no reductions were taken for transit and pedestrian accessibility. **Table 5.5-F** shows the mobile source emissions of GHG from the Project.



*Solid Waste Emissions*

CalEEMod also calculates the GHG emissions associated with the disposal of solid waste into landfills based on default data contained within the model for waste disposal rates, composition, and the characteristics of landfills throughout the state. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. The Project will include a waste reduction/recycling program; however, to provide a conservative analysis, no waste reduction was quantified. **Table 5.5-F** shows the solid waste GHG emissions from the Project.

*Water-Related Energy Usage*

Electricity is also indirectly used in water supply, treatment, and distribution, as well as wastewater treatment in Southern California and plays a large role in GHG production.

There are three processes necessary to supply potable water to urban users (i.e., residential, commercial, and industrial): (1) supply of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, the wastewater is treated and either reused as reclaimed/recycled water or returned to the environment. CalEEMod calculates the GHG emissions from these processes based on default emissions factors and water/wastewater generation rates for a project’s location. CalEEMod defaults were utilized to model the Project’s water demand. **Table 5.5-F** shows the GHG emissions from water-related energy usage for the Project.

*Total Project GHG Emissions*

As shown on **Table 5.5-F – Total Unmitigated Project-Related Annual GHG Emissions**, using all the emissions quantified above, the total GHG emissions generated from the Project is approximately 7,347.37 MTCO<sub>2</sub>E/yr which includes construction-related emissions amortized over a typical project life of 30 years.

**Table 5.5-F, Total Unmitigated Project-Related Annual GHG Emissions**

Source	Metric Tons per year (MT/yr)				Total CO <sub>2</sub> E
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	R	
Amortized Construction	--	--	--	--	71.44
Area	7.27	0.00	0.00	0.00	7.31
Energy	784.00	0.05	0.00	0.00	787.00
Mobile	5,511.00	0.26	0.27	9.01	5,609.00
Solid Waste	37.35	0.62	0.01	0.00	57.57
Water	41.40	4.14	0.00	0.00	144.40
Refrigerants	0.00	0.00	0.00	697.65	697.65
<b>Total</b>	<b>6,381.02</b>	<b>5.07</b>	<b>0.28</b>	<b>706.66</b>	<b>7,374.37</b>

Source: WEBB-A, Table 8  
**Note:** Emissions reported as zero are rounded and not necessarily equal to zero.

As discussed in *Section 5.5.6*, the City has been using the SCAQMD’s 3,000 MTCO<sub>2</sub>E/yr draft threshold for non-industrial projects for the purpose of evaluating the GHG impacts associated with proposed general development projects. As shown in **Table 5.5-F**, the total GHG emissions from the Project exceed the SCAQMD threshold of 3,000 MTCO<sub>2</sub>E/yr.

As shown in **Table 5.5-F**, the Project’s mobile source GHG emissions make up approximately 76 percent of the estimated total Project-related GHG emissions. However, as discussed below, there are

limited, if any, feasible mitigation measures that can be applied to the Project to substantially reduce the mobile source GHG emissions from the Project. Although the Project will comply with existing regulations such as Title 24 and the CALGreen code, reductions from compliance with these regulations has not been included in the emissions estimates in this analysis so that a conservative analysis of the Project's GHG emissions can be presented. Specific design aspects not included in the emissions estimates, specifically those aimed at reducing mobile source emissions, would aide in the reduction of GHG emissions, but are beyond what is presented in this analysis.

Project design features such as the rooftop and/or carport solar would further reduce GHG emissions; although, the magnitude of GHG reductions would be relatively small because these features affect the building and on-site emissions reductions.

As discussed under the *Mobile Source Emissions* subheading, above, the internal trip reduction anticipated between the Project's residential and retails uses (estimated to be approximately 22 percent in the TIA) was not estimated in the analysis to be conservative. The degree of GHG emissions reduction from the internal trips in addition to potential reductions from the Project's existing transit and pedestrian accessibility along with the proposed on-site pedestrian improvements is not assured and the effect on GHG emissions would depend on the future residents and customers and employees of the retail uses. It is also important to note that mobile source emissions are regulated at the state and federal level and the Project's GHG emissions estimates reflect the Project's opening year and as such do not account for future reductions that will occur through implementation of regulations such as the Advanced Clean Cars II program that requires 100 percent of new light-duty vehicle sales be zero emission (ZEV) by 2035.

There are mitigation measures that can be incorporated which focus on the mobile GHG emissions by reducing the amount of car trips that are used by the future Project residents. As outlined in Section 5.5.8, below, **MM GHG-1** through **MM GHG-3** attempt to reduce car trips from the Project by encouraging the use of alternative transportation and telecommuting. **MM GHG-1** through **MM GHG-3** do not have quantitative reductions associated with them available in CalEEMod and given that most of the Project-generated emissions are from mobile sources, the emissions are outside the control of the Project and City. Although mitigation measures **MM GHG-1** through **MM GHG-3** will serve to potentially reduce mobile source emissions, it is reasonable to assume that the amount of GHG reductions resulting from their implementation would not reduce Project emissions from the estimated 7,374 MTCO<sub>2</sub>E/yr to the 3,000 MTCO<sub>2</sub>E/yr threshold of significance. Thus, even with implementation of existing regulations, Project design features, and **MM GHG-1** through **MM GHG-3**, the Project will generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore impacts are **significant and unavoidable even with mitigation incorporated**.

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

As explained in Section 5.5.6, above, pursuant to Section 15064.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis to determine the significance of impacts from GHG emissions. A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project. As such, the GHG plan consistency for the Project is based on the Project's consistency with the SCAG's Connect SoCal (2020-2045 RTP/SCS), the applicable 2025 General Plan goals and policies, the City's CAP, and the 2022 Scoping Plan. The SCAG 2020-2045 RTP/SCS includes strategies for the

region to reach the regional target of reducing GHG from the transportation sector. The City’s CAP and General Plan contain strategies, goals, and policies that would help implement energy efficient, transportation, water efficient, and waste reduction measures and would subsequently reduce GHG emissions within the City. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce GHG emissions by 85 percent below 1990 levels no later than 2045.

*Consistency with SCAG Connect SoCal*

Connect SoCal (2020-2045 RTP/SCS) includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The Connect SoCal plan is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by eight percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. Section 6.0 Consistency with Regional Plans of this Draft EIR includes **Table 6.0-B, Table 6.0-B, Proposed Project Consistency with the Connect SoCal 2020-2045 RTP/SCS Goals**, which presents a side-by-side comparison of the Connect SoCal Goals and a discussion regarding the Project’s consistency, non-consistency, or non-applicability with each goal. **Table 6.0-B** identifies that the proposed Project would be consistent with all applicable SCAG Connect SoCal policies.

*City of Riverside General Plan*

The General Plan identifies objectives and policies that encourage a reduction in the City’s overall GHG emissions. **Table 5.5-G, Consistency with City of Riverside General Plan** evaluates the Project’s consistency with applicable General Plan policies.

**Table 5.5-G, Consistency with City of Riverside General Plan**

Relevant Objectives and Policies	Project Consistency
<b>Air Quality Element</b>	
<b>Objective AQ-1:</b> Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic.	
<b>Policy AQ-1.5</b> Encourage infill development projects within urbanized areas, which include job centers and transportation nodes.	<b>Consistent:</b> The Project is an infill and using an existing developed site. The area surrounding the Project site is developed and urbanized with a variety of land uses, including commercial, medium-high density residential, high-density residential, office, and public facilities.
<b>Policy AQ-1.7:</b> Support appropriate planned residential developments and infill housing, which reduce vehicle trips.	<b>Consistent:</b> The Project proposes infill development of residential and commercial-retail uses in an area already having other commercial uses to compliment the one’s proposed by the Project. With the pedestrian and bike lane connections proposed by the Project, residents of the new development as well as existing residents can reduce their vehicle trips by walking or biking to support services.
<b>Objective AQ-5:</b> Increase energy efficiency and conservation in an effort to reduce air pollution.	
<b>Policy AQ-5.1:</b> Utilize source reduction, recycling, and other appropriate measures to reduce the amount of solid waste disposed of in landfills.	<b>Consistent:</b> The Project will include a waste reduction/recycling program



**Table 5.5-G, Consistency with City of Riverside General Plan**

Relevant Objectives and Policies	Project Consistency
<b>Policy AQ-5.3:</b> Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.	<b>Consistent:</b> The Project will include rooftop and carport solar (PV) panels.
<b>Policy AQ-5.6:</b> Support the use of automated equipment for conditioned facilities to control heating and air conditioning.	<b>Consistent:</b> The Project will comply with the latest Title 24 and CALGreen code that support efficient heating and air conditioning systems.
<b>Policy AQ-5.7:</b> Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.	<b>Consistent:</b> The proposed Project will be designed and constructed to meet all applicable standards under Title 24.
<b>Objective AQ-8:</b> Make sustainability and global warming education a priority for the City's effort to protect public health and achieve state and federal clean air standards.	
<b>Policy AQ-8.17:</b> Develop measures to encourage that a minimum of 40% of the waste from all construction sites throughout Riverside be recycled by the end of 2008.	<b>Consistent:</b> The Project will comply with the latest CALGreen code, which requires a minimum of 65 percent of construction waste be recycled.
<b>Open Space &amp; Conservation Element</b>	
<b>Policy OS-8.2:</b> Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24 and encourage the installation of conservation devices in existing developments.	<b>Consistent:</b> The Project will be designed and constructed to meet all the applicable standards of Title 24.
<b>Policy OS-8.3:</b> Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources.	<b>Consistent:</b> The Project will include rooftop and carport solar (PV) panels, consistent with the current CALGreen code.
<b>Policy OS-8.4:</b> Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities.	<b>Consistent:</b> The Project will include rooftop and carport solar (PV) panels, consistent with the current CALGreen code.
<b>Policy OS-8.5:</b> Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools).	<b>Consistent:</b> The Project will be designed and constructed to meet the City's water efficient landscaping and irrigation requirements in the Municipal Code.
<b>Policy OS-8.6:</b> Require all new development to incorporate energy efficient lighting, heating, and cooling systems pursuant to the Uniform Building Code and Title 24.	<b>Consistent:</b> The Project will be designed and constructed to meet all the applicable standards of the Uniform Building Code and Title 24.
<b>Policy OS-8.7:</b> Encourage mixed use development as a means of reducing the need for auto travel.	<b>Consistent:</b> The Project proposes development of residential and commercial-retail uses.
<b>Policy OS-8.10:</b> Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.	<b>Consistent:</b> The Project will provide several pedestrian pathways to facilitate the movement of pedestrians within the site. The Project site will also provide pedestrian linkage to the surrounding area by providing connection to the existing sidewalks. The Project area is currently being served by Riverside Transit Agency, providing public transportation along Arlington Avenue and Streeter Avenue.
<b>Policy OS-8.12:</b> Require bicycle parking in new non-residential development.	<b>Consistent:</b> The Project site will provide bicycle parking, meeting, or exceeding the current CALGreen requirements.
<b>Public Facilities and Infrastructure Element</b>	
<b>Objective PF-6:</b> Provide affordable, reliable, and, to the extent practical, environmentally sensitive energy resources to residents and businesses.	
<b>Policy PF-6.3:</b> Promote and encourage energy conservation.	<b>Consistent:</b> The Project's design features include residential appliances to be Energy

**Table 5.5-G, Consistency with City of Riverside General Plan**

Relevant Objectives and Policies	Project Consistency
	Star-rated. Additionally, Project will be designed and constructed to meet all applicable standards under CALGreen and Title 24.
<b>Policy PF-6.4:</b> Encourage energy-efficient development through its site plan and building design standard guidelines.	<b>Consistent:</b> The proposed Project will be designed and constructed to meet all applicable standards under CALGreen.
<b>Policy PF-6.5:</b> Promote green building design.	<b>Consistent:</b> The proposed Project will be designed and constructed to meet all applicable standards under CALGreen.

*Consistency with City of Riverside Climate Action Plan*

The City’s CAP provides a roadmap for the City to achieve deep GHG emissions reductions through the year 2035. The CAP prioritizes the implementation of policies that enable the City to fulfill AB 32 and SB 375 requirements. CAP Table B.3-2, 2020 and 2035 Reductions from Local Measures, lists local GHG reduction measures. **Table 5.5-H, Project Consistency with the City of Riverside Climate Action Plan**, compares the proposed Project to applicable reduction measures from the CAP.

**Table 5.5-H, Project Consistency with the City of Riverside Climate Action Plan**

Applicable Measures	Project Consistency
<b>Measure E-2: Shade Trees.</b> Strategically plant trees at new residential developments to reduce the urban heat island effect.	<b>Consistent.</b> The Project landscaping includes trees throughout the development in the common open spaces.
<b>Measure T-1: Bicycle Infrastructure Improvements.</b> Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.	<b>Consistent.</b> As part of the City’s Bikeway Network, Class II bike lanes exist along Arlington Avenue which connect to the Magnolia/Market Corridor. While Streeter Avenue is GP designated Class II Bike Lane, it is not currently striped as such. However, bike lane improvements are part of the City’s capital improvement projects. As such, the City, rather than individual development projects, are responsible for the timing of implementation of bike lane improvements.
<b>Measure T-2: Bicycle Parking.</b> Provide additional options for bicycle parking.	<b>Consistent.</b> The Project site will provide bicycle parking, meeting, or exceeding the current CALGreen requirements.
<b>Measure T-3: End of Trip Facilities</b> Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters.	<b>Consistent.</b> End of trip commuter facilities can include showers, changing rooms, lockers, and bicycle storage/parking which encourage employees to walk and bike to work. As stated, the Project would provide bicycle parking spaces, thereby encouraging alternative travel modes.
<b>Measure T-6: Density.</b> Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.	<b>Consistent.</b> The proposed Project includes mixed use construction of residential and commercial buildings which would therefore increase household and employment density in the Project area.
<b>T-8 Pedestrian Only Areas.</b> Encourage walking by providing pedestrian-only community areas.	<b>Consistent.</b> The Project provides a pedestrian network along streets and on-site internal pedestrian walkways.
<b>Measure T-19: Alternative Fuel &amp; Vehicle Technology and Infrastructure.</b> Promote the use of alternative fueled vehicles such as those powered by electric, natural gas, biodiesel, and	<b>Consistent.</b> As stated, the Project site would include electric vehicle charging stations and parking spaces to promote use of alternative fuel vehicles. Consistent with the current CALGreen code.

fuel cells by Riverside residents and workers.	
<b>W-1: Water Conservation and Efficiency.</b> Reduce per capita water use by 20% by 2020.	<b>Consistent.</b> Project will be designed and constructed to meet all applicable standards under the City’s Municipal Code and CALGreen.
<b>SW-1: Yard Waste Collection.</b> Provide green waste collection bins community-wide.	<b>Consistent.</b> The Project would comply with applicable solid waste requirements from the City and State.
<b>SW-2 Food Scrap and Paper Diversion.</b> Divert food and paper waste from landfills by implementing commercial and residential collection programs.	<b>Consistent.</b> The Project would be required to participate in applicable waste diversion programs. The Project would also be subject to all applicable State and City requirements for solid waste reduction.

*2022 Scoping Plan*

The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. For example, current transportation sector measures are implemented by the manufacturers, which includes the Advanced Clean Cars II and the Low Carbon Fuel Standard. The Project is also subject to building code requirements under the building energy efficiency standards (Title 24) and green building standards (CALGreen) that improve building energy efficiency and promote transportation electrification. New buildings are required to comply with the applicable building code requirements and standards in place at the time building permit documentation submittals are made. Additionally, the City’s Municipal Code requires building electrification to reduce carbon emissions.

The 2022 Scoping Plan identifies three priority areas for local jurisdictions: transportation electrification, VMT reduction, and building electrification. As stated above, the Project supports both transportation electrification and building electrification through compliance with existing City and State standards. The Project would also provide sidewalks, bike racks, and pedestrian walkways which promotes alternative modes of transportation (walking, biking, and transit) and reduces VMT.

For these reasons outlined above, the proposed Project does not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, impacts would be **less than significant**.

**5.5.8 Recommended Mitigation Measures**

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse GHG impacts. The analysis above does show that the Project will exceed the threshold (3,000 MTCO<sub>2</sub>E/yr) and that the majority of these emissions from the Project are from the mobile sources (cars) from future residents and customers.

Mitigation measures **MM GHG-1** through **MM GHG-3**, below, shall be implemented to reduce the Project’s GHG emissions from mobile sources. There are no additional feasible mitigation measures that would reduce the Project’s cumulative impacts related to GHG emissions to a less than significant level.



- MM GHG-1 Commute Trip Reduction.** Upon a residential dwelling unit being rented, the Project Applicant or its designee shall notify and offer to the prospective tenant, as soon as it may be done, disclosure materials describing available public transit, ridesharing and non-motorized commuting opportunities available in the vicinity of the Project. Such information shall be transmitted no later than the finalization of a rental contract. A draft of this disclosure shall be submitted to the City of Riverside Planning Division for review prior to the issuance of the certificate of occupancy.
- MM GHG-2 Telecommute.** The Project Applicant or its designee shall install broadband infrastructure or other communication technologies that encourage telecommuting and working from home. The Project Applicant or its designee shall submit documentation to the City Building and Safety Division prior to occupancy.
- MM GHG-3 Unbundle Residential Parking Costs.** The Project Applicant or its designee shall provide information to the residential property owner and/or property management firm about the benefits of providing unbundled, or separate, residential parking costs from property costs for rental units, which allows those who wish to purchase parking spaces to do so at an additional cost. Unbundled parking costs may decrease vehicle ownership and, therefore, result in a reduction in VMT and GHG emissions. The Project Applicant or its designee shall submit documentation to the City Planning Division prior to occupancy.

### **5.5.9 Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented**

Although the Project does not conflict with an applicable plan, policy or regulation adopted to reduce GHG, the Project's GHG emissions exceed the SCAQMD draft threshold of 3,000 MTCO<sub>2</sub>E/yr which is being utilized as the City's threshold for this Project. Implementation of local, state, and federal regulations outlined in Section 5.5.2, Project design features outlined in Section 5.5.5, and mitigation measures listed above will reduce the Project's GHG emissions from mobile sources. However, there are no additional feasible mitigation measures that would reduce the Project's overall GHG emissions to a less than significant level. Therefore, the Project's cumulative GHG impacts will be significant and unavoidable and a statement of overriding considerations will be required prior to Project approval.

## 5.6 Hazards and Hazardous Materials

The focus of this section is to analyze potential impacts related to hazards and hazardous materials. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project specifically, from accident conditions involving the release of hazardous materials into the environment and safety hazard or excessive noise for people within airport land use plan. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics.

A *Phase I Environmental Site Assessment* (2021 Phase I ESA) was conducted by Weis Environmental dated November 11, 2021 (WEIS-A) as well as an *Addendum to Phase I Environmental Site Assessment* (Addendum) dated March 10, 2023 (WEIS-B), and *Work Plan for Subsurface Assessment* (Work Plan) dated October 3, 2022 (WEIS-C). A *Comprehensive Subsurface Assessment* was also conducted by Weis Environmental dated July 31, 2023 (WEIS-D). The Project was required to be reviewed by the Riverside County Airport Land Use Commission (ALUC). As such, ALUC prepared a *Consistency Determination* letter dated January 18, 2023 (ALUC-B), a *Staff Report for Case ZAP1107RI22* dated January 12, 2023 (ALUC-C) and *ALUC Development Review-Commissioner Concerns* letter dated January 18, 2023 (ALUC-D). These reports and letters are included in Appendix D of this Draft EIR.

### 5.6.1 Setting

The Project site is located at the northeast corner of Arlington Avenue and Streeter Avenue and is currently developed with a multi-story former Sears Department store structure that includes a basement level and occupies the central portion of the property. The site also includes a single-story former Sears Automotive Service Center that includes a basement level on the western portion of the property. The Sears Department store structure has occasionally been occupied by a Spirit Halloween Store in the southeastern portion of the building on the ground level. However, both structures are currently vacant. (WEIS-A, p. 4).

The former Sears Department store was located in the central portion of the now vacant building. The interior of the vacant department store building includes retail areas, warehouse and supply storage areas, sub-grade basement areas, public and freight hydraulic elevators, and restrooms. The basement area contains a disconnected boiler, trash compactor, and emergency generator.

The former Sears Automotive Service Center structure includes six bay doors opening to a concrete-paved former service area with secondary containment structures, nine hydraulic hoists, and a sub-grade oil/water separator. The site formerly contained a vehicle fueling island and distribution lines with three 10,000-gallon gasoline underground storage tanks (USTs) and seven 1,000 to 2,000-gallon oil and waste oil USTs. The balance of the remaining site property comprises asphalt-paved parking areas, driveways, and minor landscaping. (WEIS, p. 4).

The area surrounding the site consists primarily of commercial and residential properties and public roadways. Access to the Project site is provided by Arlington Avenue and Streeter Avenue along the southern and western sides of the property, respectively. Indicators of various utility systems are present throughout the Project site, primarily adjoining the building exteriors and along the Project site perimeter. Utilities present at the Project site or in the surrounding area include potable water, sewage maintenance, electrical, natural gas, and solid waste disposal. (WEIS-A, pp. 4-5).

## Site Background

A prior Phase I ESA conducted for the Project site identified that the Sears Automotive Service Center contained ten UST's. The three 10,000-gallon UST's were removed in 1985. The seven 1,000 to 2,000-gallon oil and waste oil UST's were removed in 1987. The fueling island and distribution lines were removed in 1994. A leak was discovered during UST removal. Soil investigation and groundwater monitoring took place between 1993 and 2003. The Santa Ana Regional Water Quality Control Board (SARWQCB) granted regulatory closure for the UST release via a "No Further Action" letter dated June 26, 2003. The letter indicated that corrective action should be reviewed in the future if land use changes. Groundwater contaminants were determined to be present at concentrations exceeding regulatory risk-based groundwater screening levels (specifically total petroleum hydrocarbons [TPH] as gasoline, ethylbenzene, xylenes, and tetrachloroethene [PCE]). The former USTs were identified as a controlled recognized environmental condition (CREC). Due to the 60 years of automotive servicing that previously took place, the Automotive Center's oil/water separator site was identified as a REC because of the unknown chemical usage, hazardous waste management disposal activities, lack of the soil/groundwater data, and the absence of continuous service records. PCE detected in groundwater was also identified as a recognized environmental condition (REC) and a documented release was identified with the Crown Cleaners facility approximately 600 feet south (up-gradient) of the site in the current Heritage Plaza Shopping Mall as the likely source. Lastly, asbestos abatement work was conducted on the site in 2002 which included the removal of sheetrock joint compound, acoustic ceiling tile adhesive, vinyl floor tile, and flooring adhesive. Additional asbestos containing materials reportedly remains on the site. As such, a prior Phase II ESA was conducted. On March 6, 2015, five direct push boring locations were advanced to a maximum depth of 45 feet below ground surface for soil and groundwater sampling. Sample locations were chosen to characterize potential impacts related to the former on-Site UST system, the automotive center oil/water separator, and solvent releases from the up-gradient off-Site Crown Cleaners facility. TPH concentrations below the applicable Los Angeles RWQCB maximum screening levels and volatile organic compound (VOC) concentrations below the United States Environmental Protection Agency (USEPA) Region 9 Regional Screening Levels were detected in soil collected from the former UST and oil/water separator areas. PCE was detected in groundwater collected from each of the five locations at concentrations above the laboratory method detection limits but below the USEPA Region 9 Regional Screening Level. VOCs (specifically benzene, ethylbenzene, 1,2-dichloroethane, and total xylenes) were detected at concentrations greater than California Environmental Protection Agency (CalEPA) Maximum Contaminant Levels (MCLs) in groundwater collected from one location near the former fueling island and area. VOCs were also detected in groundwater collected near the automotive service center, but at concentrations below respective CalEPA MCLs. TPH (gasoline, diesel, and oil range fractions) was detected at concentrations above the San Francisco RWQCB Regional Environmental Screening Levels in the vicinity of the former USTs, oil/water separator, and southeast portion of the Project site. (WEIS-A, pp. 10-11).

## Airport Land Use Compatibility Zones

The Project site is located within the *Riverside County Airport Municipal Airport Land Use Compatibility Plan* (RCALUCP) and is approximately one mile from the airport runway (GE); specifically the Riverside Municipal Airport (RMA). The Plan identifies prohibited and discouraged uses within each land use compatibility zone as well as density/intensity standards and open land requirements, as shown on **Table 5.6-A, Basic Land Use Compatibility Criteria**. Most of the Project site is located within Land Use Compatibility Zone B1 while smaller portions are located with Zones C and D as shown in **Figure 3.0-6** in Section 3.0 – Project Description of this Draft EIR.



**Table 5.6-A, Land Use Compatibility Criteria**

Zone	Location	Density/Intensity Standards			Req'd Open Land	Additional Criteria	
		Residential (du/ac) <sup>1</sup>	Other Uses (people/acre) <sup>2</sup>			Prohibited Uses <sup>3</sup>	Other Development Conditions <sup>4</sup>
			Avg <sup>5</sup>	Single <sup>6</sup>			
B1	Inner Approach Departure Zone	0.05 (average parcel size ≥20.0ac)	25	50	30%	<ul style="list-style-type: none"> <li>▪ Children's schools, day care centers, libraries</li> <li>▪ Hospitals, nursing homes</li> <li>▪ Places of worship</li> <li>▪ Buildings with &gt;2 aboveground habitable floors</li> <li>▪ Highly noise-sensitive outdoor nonresidential uses<sup>7</sup></li> <li>▪ Aboveground bulk storage of hazardous materials<sup>8</sup></li> <li>▪ Critical community infrastructure facilities<sup>9</sup></li> <li>▪ Hazards to flight<sup>10</sup></li> </ul>	<ul style="list-style-type: none"> <li>▪ Locate structures maximum distance from extended runway centerline</li> <li>▪ Minimum NLR of 25 dB in residences (including mobile homes) and office buildings<sup>11</sup></li> <li>▪ Airspace review required for objects &gt;35 feet tall<sup>12</sup></li> <li>▪ Avigation easement dedication</li> </ul>
C	Extended Approach/ Departure Zone	0.2 (average parcel size ≥5.0 ac)	75	150	20%	<ul style="list-style-type: none"> <li>▪ Children's schools, day care centers, libraries</li> <li>▪ Hospitals, nursing homes</li> <li>▪ Buildings with &gt;2 aboveground habitable floors</li> <li>▪ Highly noise-sensitive outdoor nonresidential uses<sup>7</sup></li> <li>▪ Hazards to flight<sup>10</sup></li> </ul>	<ul style="list-style-type: none"> <li>▪ Minimum NLR of 20 dB in residences (including mobile homes) and office buildings<sup>11</sup></li> <li>▪ Airspace review required for objects &gt;70 feet tall<sup>13</sup></li> <li>▪ Deed notice required</li> </ul>
D	Primary Traffic Patterns and Runway	<b>(1)</b> ≤0.2 (average parcel size	100	300	10%	<ul style="list-style-type: none"> <li>▪ Highly noise-sensitive outdoor nonresidential uses<sup>7</sup></li> </ul>	<ul style="list-style-type: none"> <li>▪ Airspace review required for objects &gt;70 feet tall<sup>13</sup></li> </ul>

**Table 5.6-A, Land Use Compatibility Criteria**

Zone	Location	Density/Intensity Standards			Req'd Open Land	Additional Criteria	
		Residential (du/ac) <sup>1</sup>	Other Uses (people/acre) <sup>2</sup>			Prohibited Uses <sup>3</sup>	Other Development Conditions <sup>4</sup>
			Avg <sup>5</sup>	Single <sup>6</sup>			
	Buffer Area	≥5.0 ac) or <sup>14</sup> (2) ≥5.0 (average parcel size ≤0.2 ac)				■ Hazards to flight <sup>10</sup>	■ Children's schools, hospitals, nursing homes discouraged <sup>15</sup> ■ Deed notice required

Source: RCALUCP, Table 2A – Basic Compatibility Criteria

Notes:

1. Residential development must not contain more than the indicated number of dwelling units (excluding secondary units) per gross acre. Clustering of units is encouraged. See Policy 4.2.5 for limitations. Gross acreage includes the property at issue plus a share of adjacent roads and any adjacent, permanently dedicated, open lands. Mixed-use development in which residential uses are proposed to be located in conjunction with nonresidential uses in the same or adjoining buildings on the same site shall be treated as nonresidential development. See Policy 3.1.3(d).
2. Usage intensity calculations shall include all people (e.g., employees, customers/visitors, etc.) who may be on the property at a single point in time, whether indoors or outside.
3. Open land requirements are intended to be applied with respect to an entire zone. This is typically accomplished as part of a community general plan or a specific plan but may also apply to large (10 acres or more) development projects. See Policy 4.2.4 for definition of open land.
4. The uses listed here are ones that are explicitly prohibited regardless of whether they meet the intensity criteria. In addition to these explicitly prohibited uses, other uses will normally not be permitted in the respective compatibility zones because they do not meet the usage intensity criteria.
5. As part of certain real estate transactions involving residential property within any compatibility zone (that is, anywhere within an airport influence area), information regarding airport proximity and the existence of aircraft overflights must be disclosed. This requirement is set by state law. See Policy 4.4.2 for details. Easement dedication and deed notice requirements indicated for specific compatibility zones apply only to new development and to reuse if discretionary approval is required.
6. The total number of people permitted on a project site at any time, except rare special events, must not exceed the indicated usage intensity times the gross acreage of the site. Rare special events are ones (such as an air show at the airport) for which a facility is not designed and normally not used and for which extra safety precautions can be taken as appropriate.
7. Examples of highly noise-sensitive outdoor nonresidential uses that should be prohibited include amphitheaters and drive-in theaters. Caution should be exercised with respect to uses such as poultry farms and nature preserves.
8. Storage of aviation fuel and other aviation-related flammable materials on the airport is exempted from this criterion. Storage of up to 6,000 gallons of nonaviation flammable materials is also exempted. See Policy 4.2.3(c) for details.
9. Critical community facilities include power plants, electrical substations, and public communications facilities. See Policy 4.2.3(d) for details.
10. Hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land use development that may cause the attraction of birds to increase is also prohibited. See Policy 4.3.7.
11. NLR = Noise Level Reduction, the outside-to-inside sound level attenuation that the structure provides. See Policy 4.1.6.
12. Objects up to 35 feet in height are permitted. However, the Federal Aviation Administration may require marking and lighting of certain objects. See Policy 4.3.6 for details.
13. This height criterion is for general guidance. Shorter objects normally will not be airspace obstructions unless situated at a ground elevation well above that of the airport. Taller objects may be acceptable if determined not be obstructions. See Policies 4.3.3 and 4.3.4.
14. Two options are provided for residential densities in Compatibility Zone D. Option (1) has a density limit of 0.2 dwelling units per acre (i.e., an average parcel size of at least 5.0 gross acres). Option (2) requires that the density be greater than 5.0 dwelling units per acre (i.e., an average parcel size less than 0.2 gross acres). The choice between these two options is at the discretion of the local land use jurisdiction. See Table 2B for explanation of rationale. All other criteria for Zone D apply to both options.
15. Discouraged uses should generally not be permitted unless no feasible alternative is available.

Consistency with RCALUCP’s airport influence area is determined based on each criterion of the applicable compatibility zone. The Plan also identifies specific noise and safety compatibility zone factors as shown in **Table 5.6-B Compatibility Zone Factors**.

**Table 5.6-B, Compatibility Zone Factors**

Zone	Location	Noise and Overflight Factors	Safety and Airspace Protection Factors
B1	Inner Approach/Departure Zone	<p><i>Noise Impact: High</i></p> <ul style="list-style-type: none"> <li>▪ Mostly within 60-CNEL contour (55-CNEL at outlying airports)</li> <li>▪ Single-event noise sufficient to disrupt wide range of land use activities including indoors if windows open</li> </ul>	<p><i>Risk level: High</i></p> <ul style="list-style-type: none"> <li>▪ Encompasses areas overflowed by aircraft at low altitudes — typically only 200 to 400 feet above runway</li> <li>▪ Some 10% to 20% of off-runway general aviation accidents near airports take place here</li> <li>▪ Object heights restricted to as little as 50 feet</li> </ul>
C	Extended Approach /Departure Zone	<p><i>Noise Impact: Moderate</i></p> <ul style="list-style-type: none"> <li>▪ Mostly within 55-CNEL contour beyond runway ends</li> <li>▪ Aircraft typically below 1,000 feet altitude on arrival; individual events occasionally loud enough to intrude upon indoor activities</li> </ul>	<p><i>Risk level: Moderate</i></p> <ul style="list-style-type: none"> <li>▪ Includes areas where aircraft: <ul style="list-style-type: none"> <li>○ Turn from base to final approach legs of standard traffic pattern and descend from traffic pattern altitude</li> <li>○ On departure, normally complete transition from takeoff power and flap settings to climb mode and begin turns to en route heading</li> <li>○ On an instrument approach procedure, have descended below about 500 feet AGL</li> <li>○ Some 10% to 15% of off-runway general aviation accidents near airports occur in this zone</li> </ul> </li> <li>▪ Object heights restricted to as little as 50 feet</li> </ul>
D	Primary Traffic Patterns	<p><i>Noise Impact: Moderate</i></p> <ul style="list-style-type: none"> <li>▪ Mostly within 55-CNEL contour if any</li> <li>▪ Aircraft at or above traffic pattern except for instrument approaches</li> <li>▪ More concern with respect to individual loud events than with cumulative noise contours</li> <li>▪ Residential density criteria for this zone provide two options on basis that noise concerns can be minimized either by limiting number of dwelling units in affected areas or by allowing high-density development which tends to have comparatively high ambient noise levels</li> </ul>	<p><i>Risk level: Low</i></p> <ul style="list-style-type: none"> <li>▪ Aircraft on instrument approaches below 1,000 feet</li> <li>▪ About 20% to 30% of general aviation accidents take place in this zone, but large area encompassed means low likelihood of accident occurrence in any given location</li> <li>▪ Risk concern primarily with uses for which potential consequences are severe (e.g., very-high-intensity activities in a confined area)</li> <li>▪ Object height limits generally at least 100 feet</li> </ul>

Source: RCALUCP, Table 3A – Compatibility Zone Factors



### **Airport Safety Concerns**

The State of California, Department of Transportation – Division of Aeronautics, *California Airport Land Use Planning Handbook* (DOT) identifies that safety is a factor in the interaction between airports and nearby land uses in three distinct ways:

- Protecting people and property on the ground.
- Minimizing injury to aircraft occupants.
- Preventing creation of hazards to flight.

Each of these concerns needs to be addressed in airport land use compatibility plans. The nature of each is summarized in the following discussion.

#### *Protecting People and Property on the Ground*

Protecting people and property on the ground from potential consequences of accidents near an airport is a fundamental land use compatibility objective. To accomplish this, some form of restrictions on land use is essential. Land use characteristics are the most important factors to consider in safety compatibility criteria. The potential severity of an off-airport accident is highly dependent upon the nature of the land use at the accident site. For the purposes of evaluating the relative risks presented by different land uses, three characteristics are most important.

- **Intensity of Use** – The most direct means of limiting the potential consequences of an off-airport aircraft accident is to limit the intensity of use. Intensity of use is measured in terms of the number of people which the development can attract per acre. This measurement service is a common denominator among various types of nonresidential uses. Except for certain especially risk-sensitive uses, as noted below, the degree of safety compatibility is usually considered the same for any two land uses of similar usage intensities.
- **Residential versus Non-residential Functions** – Residential land uses are typically measured in dwelling units per acre, rather than people per acre. This is principally a practical measure to simplify implementation. However, residential uses are also normally afforded a comparatively higher degree of protection than non-residential uses. That is, for a given location, higher occupancy levels are permitted for non-residential uses than residential uses.
- **Sensitive Uses** – Certain other types of land uses are also commonly regarded as requiring special protection from hazards such as potential aircraft accidents. These uses fall into two categories:
  1. *Low Effective Mobility Occupancies*: Society normally seeks a high degree of protection for certain groups of people, especially children and the infirm. A common element among these groups is inability, either because of inexperience or physical limitations, to move out of harm's way. Among the types of land uses regarded as particularly risk-sensitive are elementary and secondary schools, day care centers, hospitals, and nursing homes.
  2. *Hazardous Materials*: Functions, such as above-ground storage of large quantities of flammable materials or other hazardous substances which could substantially contribute to the severity of an aircraft accident if they were to be involved in one.

#### *Minimizing Injury to Aircraft Occupants*

In accidents involving an aircraft that is out of control as it descends, the character of the land uses below are not likely to have a significant effect on the survivability of the crash. However, some aircraft mishaps involve situations in which the aircraft is descending, often without power, but otherwise under control. If the aircraft has sufficient altitude, the pilot has some choice as to where to attempt an emergency landing. Under these circumstances, the pilot of a disabled aircraft will, if possible, direct the aircraft toward some form of open land when an off-airport emergency landing is inevitable. This propensity forms the premise behind the primary form of land use control intended to minimize the severity of injury to aircraft occupants in the event of an off-airport emergency landing. Specifically, some amount of useful open land should be preserved in the vicinity of airports.

#### *Preventing Creations of Hazards to Flight*

Unlike the preceding land use characteristics which can only affect the consequences of an aircraft accident (for better or worse), hazards to flight can be the cause of an accident. Hazards to flight fall into three basic categories:

- Obstructions to airspace required for flight to, from, and around an airport.
- Wildlife hazards.
- Other forms of interference with safe flight, navigation, or communication.

## **5.6.2 Related Regulations**

### **Federal Regulations**

#### *Federal Toxic Substances Control Act of 1976*

The Federal Toxic Substances Control Act of 1976 tasked the U.S. Environmental Protection Agency (EPA) with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. The Federal Toxic Substances Control Act (TCA) addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls, asbestos, radon, and lead-based paint. (EPA-A).

#### *Comprehensive Environmental Response, Compensation, and Liability Act of 1980*

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List, which is a list of contaminated sites warranting further investigation by the EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986. (EPA-B).

*Superfund Amendments and Reauthorization Act*

The Superfund Amendments and Reauthorization Act amended CERCLA on October 17, 1986. The Superfund Amendments and Reauthorization Act had several changes and additions, including the following:

- Stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites
- Required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations.
- Provided new enforcement authorities and settlement tools
- Increased state involvement in every phase of the Superfund program
- Increased the focus on human health problems posed by hazardous waste sites
- Encouraged greater citizen participation in making decisions on how sites should be cleaned up
- Increased the size of the trust fund to \$8.5 billion.

The Superfund Amendments and Reauthorization Act also required the Environmental Protection Agency (EPA) to revise the Hazard Ranking System to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the National Priorities List. (EPA-C).

*Occupational Safety and Health Act of 1970 and Occupational Safety and Health Administration*

The Occupational Safety and Health Act of 1970 was passed to prevent workers from being killed or seriously harmed at work. The Occupational Safety and Health Act of 1970 created the Occupational Safety and Health Administration (OSHA), which sets and enforces protective workplace safety and health standards. OSHA also provides information, training, and assistance to employers and workers. Under the Occupational Safety and Health Act of 1970, employers have the responsibility to provide a safety workplace. Title 29 CFR §1910 contains OSHA regulations for hazard communication. OSHA implements and enforces regulations pertaining to general industry standards (29 CFR §1910) and construction operations (29 CFR §1926). Both of these regulations address the handling of toxic or hazardous material. (OSHA).

*Federal Aviation Administration*

Land use safety guidance from the Federal Aviation Administration (FAA) is limited to the immediate vicinity of the runway, the runway protection zones at each end of the runway, and the protection of navigable airspace. The FAA criteria apply only to property controlled by the airport proprietor. It has no authority over off-airport land uses.

The emphasis in FAA safety criteria is upon the runway surface and the areas immediately adjoining it. Standards are established which specify ground surface gradients for areas adjacent to runways and acceptable location and height of aeronautical equipment placed nearby.

Runway protection zones (RPZs) are trapezoidal-shaped areas located at ground level beyond each end of a runway. The dimensions of RPZs vary depending upon the type of landing approach available at the airport (visual, non-precision, or precision) and characteristics of the critical aircraft operating at the airport (weight and approach speed). Ideally, each RPZ should be clear of all objects. The FAA's *Airport Design* advisory circular strongly recommends that airports own this property outright or to obtain



easements sufficient to control the land. Even on portions of the RPZs not under airport control, the FAA recommends that churches, schools, hospitals, office buildings, shopping centers, and other places of public assembly, as well as fuel storage facilities be prohibited. Beyond the RPZs, the FAA has no specific safety-related land use guidance other than airspace protection.

#### *Federal Aviation Regulations, Part 77*

Part 77 of the Federal Aviation Regulations (FAR), *Safe Efficient Use and Preservation of the Navigable Airspace*, establishes standards for determining obstructions to navigable airspace and the effects of such obstructions on the safe and efficient use of that airspace. The regulations require that the FAA be notified of proposed construction or alteration of objects (whether permanent, temporary, or of natural growth) if those objects would be of a height which exceeds FAR Part 77 criteria. (FAR PART77).

The Part 77 regulations define a variety of imaginary surfaces at certain altitudes around airports. The Part 77 surfaces include the primary surface, approach surface, transitional surface, horizontal surface, and conical surface. Collectively, the Part 77 surfaces around an airport define a bowl-shaped area with ramps sloping up from each runway end. The Part 77 standards are not absolute height restrictions, but instead identify elevations at which structures may present a potential safety problem. Penetrations of the Part 77 surface generally are reviewed on a case-by-case basis. (FAR PART77).

The Federal Aviation Administration (FAA) has additional guidelines regarding protection of airport airspace, which are set forth in other FAA documents. In general, these criteria specify that no use of land or water anywhere within the boundaries encompassed by FAR Part 77 should be allowed if it could endanger or interfere with the landing, take off, or maneuvering of an aircraft at an airport (FAA). Specific characteristics to be avoided include creation of electrical interference with navigational signals or radio communication between the airport and aircraft, lighting which is difficult to distinguish from airport lighting, glare in the eyes of pilots using the airport, smoke, or other impairments to visibility in the airport vicinity, and uses which attract birds and create bird strike hazards. (FAR PART77).

## **State Regulations**

### *California Environmental Protection Agency*

The boards, departments, and offices that make up the California Environmental Protection Agency (CalEPA) include CARB, the Department of Pesticide Regulation, the Department of Resources Recycling and Recovery, the Department of Toxic Substances Control (DTSC), the Office of Environmental Health Hazard Assessment, and the State Water Resources Control Board. These boards, departments and offices were placed within the CalEPA “umbrella” to create a cabinet-level voice for the protection of human health and the environment (such as clean air, clean water, clean soil, safe pesticides, and waste recycling and reduction) to assure the coordinated deployment of state resources. (CALEPA-A).

### *California Government Code Section 65962*

Pursuant to Government Code 65962.5, environmental regulatory database lists were reviewed to identify and locate properties with known hazardous substance contamination within the proposed project area (California Government Code, Section 65960 et seq.). Four state agencies are required to provide lists of facilities that have contributed, harbor, or are responsible for environmental contamination within their jurisdiction. The four state agencies that are required to provide these lists to the Secretary for Environmental Protection include the DTSC, the State Department for Health Services, the State Water Resources Control Board, and the California Integrated Waste Management Board. The Secretary for Environmental Protection then takes each of the four respective agency lists and forms one

list, referred to as the Hazardous Waste and Substances Site List – Site Cleanup (Cortese List), which is made available to every city and/or county in California (CALEPA-B).

*California Occupational Safety and Health Administration*

CalOSHA is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. CalOSHA standards are generally more stringent than federal regulations. Cal OSHA, under California Code of Regulations (CCR) Title 8 §§337–340, requires employers to monitor worker exposure to listed hazardous substances and notify workers of exposure. The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings. (DIR).

*California Hazardous Waste Control Law*

The California Hazardous Waste Control Law (Health and Safety Code, Division 20, Chapter 69.5) is administered by the CalEPA to regulate the management of hazardous wastes. While the Hazardous Waste Control Law is generally more stringent than the Resource Conservation and Recovery Act, until the EPA approves the California hazardous waste control program (which is charged with regulating the generation, treatment, storage, and disposal of hazardous waste), both the state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills. (HSC 6.95).

*Department of Toxic Substance Control*

The Department of Toxic Substance Control manages hazardous waste under CCR Title 22 Division 4.5, which establishes criteria for identifying, packaging, and labeling hazardous wastes; dictate the management of hazardous waste; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in landfills. These regulations also require hazardous waste generators to prepare a Hazardous Waste Contingency Plan that describe hazardous waste storage and secondary containment facilities, emergency response and evacuation procedures, and employee hazardous waste training program. (DTSC).

*Aeronautics Act*

The Aeronautics Act (Public Utilities Code §§ 21001 *et seq.*) provides for the right of flight over private property, unless conducted in a dangerous manner or at altitudes below those prescribed by federal authority. The Act gives the State Department of Transportation (Caltrans) and local governments the authority to protect the airspace defined by FAR Part 77 criteria. The act prohibits any person from constructing a structure or permitting any natural growth of a height that would constitute a hazard to air navigation unless a permit is obtained from Caltrans. No permit is required if it is determined that the structure or growth is not a hazard to aviation. Typically, this has been interpreted to mean that no penetration of FAR Part 77 imaginary surfaces is permitted without a finding by the FAA that the object would not constitute a hazard to air navigation.

The State Aeronautics Act also created the requirement for an Airport Land Use Commission (ALUC) in each county and established statewide requirements for the conduct of airport land use compatibility planning. State statutes require that once an ALUC has adopted or amended an airport land use compatibility plan, the county (where it has land use jurisdiction within the airport influence area), and

any affected cities must update their General Plans and any applicable specific plans to be consistent with the ALUC's plan (Government Code § 65302.3). The California Airport Land Use Planning Handbook is published by the Caltrans Division of Aeronautics to support and amplify the State regulations. The most recent California Airport Land Use Planning Handbook was published in October 2011 and as required by CEQA (Public Resources Code § 21096), was used as a technical resource in the preparation of this DEIR.

#### *Public Utilities Code*

Public Utilities Code (PUC) Section 21670 establishes that every county in which there is located an airport which is served by a scheduled airline shall establish an airport land use commission. Section 21676 and establishes among other things that prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission pursuant to Section 21675, the local agency shall first refer the proposed action to the commission. If the commission determines that the proposed action is inconsistent with the commission's plan, the referring agency shall be notified. Section 21676.5 establishes that the local agency may propose to overrule the commission after the hearing by a two-thirds vote of its governing body if it makes specific findings that the proposed action is consistent with the purposes of this article as stated in Section 21670.

### **Regional Regulations**

#### *Riverside County Department of Environmental Health – Hazardous Materials Branch*

The California Environmental Protection Agency designated the County's Hazardous Materials Branch as the Certified Unified Program Agency (CUPA) for Riverside County. The role of the CUPA is to assure consolidation, consistency, and coordination of the hazardous materials programs within the County. The CUPA also oversees the two Participating Agencies (Corona Fire and Riverside Fire) that implement hazardous materials programs within the County. The Riverside County Department of Environmental Health Hazardous Materials Branch is responsible for overseeing the six hazardous materials programs in the County. The Branch is responsible for inspecting facilities that handle hazardous materials, generate hazardous waste, treat hazardous waste, own/operate underground storage tanks, or own/operate aboveground petroleum storage tanks. In addition, the Branch maintains an emergency response team that responds to hazardous materials and other environmental health emergencies 24 hours a day, 7 days a week. (CUPA)

#### *Riverside County Airport Land Use Compatibility Plan*

The Riverside County Airport Land Use Commission (ALUC) is the lead agency responsible for airport land use compatibility planning in Riverside County. The fundamental purpose of ALUC is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. The basic function of the airport land use compatibility plan is to promote compatibility between airports and the land uses that surround them. Compatibility plans serve as a tool for use by airport land use commissions in fulfilling their duty to review proposed development plans for airports and surrounding land uses. Additionally, compatibility plans set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development.



## Local Regulations

### *City of Riverside 2025 General Plan*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. LU-36 – LU-39, LU-56):

### **Land Use/Urban Design Element**

- Objective LU-22      Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port, Riverside Municipal and Flabob Airports.
- Policy LU-22.2      Work cooperatively with the Riverside County Airport Land Use Commission in developing, defining, implementing, and protecting airport influence zones around the MARB/MIP, Riverside Municipal and Flabob Airports and in implementing the new Airport Land Use Compatibility Plan.
- Policy LU-22.3      Work to limit the encroachment of uses that potentially pose a threat to continued airport operations, including intensification of residential and/or commercial facilities within identified airport safety zones and areas already impacted by current or projected airport noise.
- Policy LU-22.5      Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted in the Public Safety Element (Figure PS-6A – Riverside Municipal and Flabob Airport Safety Zones and Influence Areas; and Figure PS-6B – March ARB/IPA Airport Safety Zones and Influence Areas) for consistency with all applicable airport land use compatibility plan policies adopted by the Riverside County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible.
- Policy LU-22.7      Prior to the adoption or amendment of the General Plan or any specific plan, zoning ordinance or building regulation affecting land within the airport influence areas of the airport land use compatibility plan for Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport, refer such proposed actions for determination and processing by the ALUC as provided by Public Utilities Code Section 21670.
- Policy LU-22.8      The City may from time to time elect to voluntarily submit proposed actions or projects that are not otherwise required to be submitted to the ALUC under Airport Land Use law in the following circumstances:
- a. Clarification: If there is a question as to the purpose, intent, or interpretation of an airport land use compatibility plan (ALUCP) or its provisions; or
  - b. Advisory: If assistance is needed concerning a proposed action or project relating to Airport Land Use matters; or
  - c. ALUC Request: The ALUC requests that certain types be voluntarily submitted for review. These actions are identified in the ALUCP as “major land use action.”

Policy LU-22.9	All development proposals within an airport influence area and subject to ALUC review will also be submitted to the manager of the affected airport for comment.
Objective LU-32	Preserve existing residential areas within the Airport Neighborhood.
Policy LU-32.1	Encourage developers of single-family residences to include a higher level of sound attenuation in new homes than required by City standards.

*City of Riverside 2025 General Plan EIR*

The following are applicable mitigation measures from the Riverside 2025 General Plan that pertain to hazards and hazardous materials (GP 2025 FEIR, p. 5.7-37).

**Mitigation Measure MM Haz 1:** To reduce project-related adverse impacts to sites containing hazardous materials and/or sites where known hazardous materials contamination may have existed that may be inadvertently discovered during construction of projects soils testing shall be conducted by a qualified soils engineer and submitted to the City for the evaluation of hazardous chemical levels in the soil. The report submitted to the City should indicate if remediation of the soils is necessary to achieve less than significant levels of hazardous chemical in the soils. Proper investigation, and remedial actions, if necessary, including a workplan shall be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.

*City of Riverside Phase I General Plan Update EIR*

There are no applicable mitigation measures from the GPU EIR that pertain to Hazards and Hazardous Materials.

*City of Riverside Municipal Code*

The following sections of the City's Municipal Code that are applicable to potential hazards and hazardous materials:

**Chapter 19.149 – Airport Land Use Compatibility.** The purpose of this chapter is to establish and implement the requirements of the Riverside County Airport Land Use Compatibility Plan (RCALUCP) for airports that affect land uses within the City of Riverside. Airports that affect land uses within the City of Riverside are the Riverside Municipal Airport, Flabob Airport, and the March Air Reserve Base/Inland Port Airport.

**Chapter 19.149.020 – Airport Land Use Compatibility Plan (ALUCP).** For property located within a compatibility zone and subject to airport land use compatibility plan policies and criteria, land use, density, and intensity limitations of the ALUCP may be more restrictive than what would otherwise be allowed per City zoning designation applicable to the property. In addition to complying with the Zoning requirements of this title, proposed uses and development on property within an airport compatibility zone must be determined to be consistent with, and comply with the compatibility criteria of the applicable compatibility zone and airport land use compatibility plan.

**Chapter 19.149.030 – Airport Land Use Commission (ALUC).** This chapter identifies the purpose of the ALUC which is to conduct airport land use compatibility planning. ALUCs protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports.

**Chapter 19.150 – Base Zones Permitted Land Uses.** This section establishes land use regulations for all base zones listed in this article consistent with the stated intent and purpose of each zone.

**Chapter 19.150.020 – Permitted Land Uses.** This chapter identifies through sub-section 19.150.020.B that Airport Land Use Compatibility includes additional Airport Land Use Compatibility Plan requirements for discretionary actions proposed on property located within an Airport Compatibility Zone. When located within an Airport Land Use Compatibility Zone, greater land use, restrictions for airport compatibility may apply per the applicable Airport Land Use Compatibility Plan. Specifically, the permitted land use table identifies multiple-family dwellings in the Mixed Use Village zone as a permitted use by the City, but it also identifies that the uses are also subject to the ALUCP criteria “where use may be strictly prohibited.”

**Chapter 19.590.030 – Hazardous and Toxic Materials.** (A.) The intent of this section is to protect local health, safety, and general welfare by ensuring that the design and operational characteristics of a property or use does not adversely impact neighboring property owners, neighboring property users or the general public through the accidental or intentional release or use of hazardous materials. (B.) The use, handling, storage, and transportation of hazardous and extremely hazardous materials shall comply with the provisions of the California Hazardous Materials Regulations (California Administrative Code, Title 22, Division (4). The U.S. EPA and the California Department of Health Services (DHS) identify hazardous materials and prescribe handling, use and disposal practices. The use, storage, manufacture, and disposal of hazardous materials shall be regulated and monitored according to the standards established by these agencies and any delegated government agencies. (C.) The use, handling, storage, and transportation of combustibles and explosives shall comply with the provisions of the Uniform Fire Code. No gasoline or other inflammables or explosives shall be stored unless the location, plans, and construction conform to the laws and regulations of the State of California and have the approval of the City of Riverside. (D.) Toxic gases or matter shall not be emitted that can cause any damage to health, to animals or vegetation, or other forms of property, or that can cause any excessive soiling beyond the lot lines of the use.

*City of Riverside Emergency Operations Plan*

The City of Riverside (City) Office of Emergency Management (OEM) is also known as the City of Riverside Fire Department's Emergency Services Division and administers a comprehensive all-hazards community based emergency management program. Riverside OEM promotes a disaster resistant and resilient community through partnerships with all levels of government entities, businesses, non-governmental organizations and the residents and visitors of the City of Riverside.

*City of Riverside Local Hazard Mitigation Plan*

The City is guided by the Local Hazard Mitigation Plan (LHMP). The City is in the process of updating this plan. The purpose of the plan is to evaluate and assess the identified hazards pose to the city, review, and assess past disaster occurrences and through the engagement of the whole community set goals to mitigate potential risks to reduce or eliminate long-term risk to people, property, and environment from natural, human caused and technological hazards. (LHMP, p. 4)



### 5.6.3 Comments Received in Response to the Notice of Preparation

No comments were received regarding recreation in response to the Initial Study/Notice of Preparation (IS/NOP).

### 5.6.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the Initial Study (Appendix A) and as outlined in Section 4.0 of this DEIR, implementation of the proposed Project will have a less than significant impact in the following areas and these topics are not addressed in this DEIR:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment; and
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area.

### 5.6.5 Project Design Features

The Project includes design features that comply with ALUC’s policies to shield outdoor lighting so that it faces downward and include water quality features utilizing Modular Wetlands which are designed to capture and treat water in underground facilities before conveyance into the existing storm drain facilities in Streeter Avenue as discussed in Section 4.0 – Environmental Effects Found Not Significant of this Draft EIR. Because Modular Wetlands allow for treatment in underground chambers, there will be no basins that could allow for standing water. Further, all landscape and vegetation is in accordance with ALUC’s *Landscaping Near Airports and Airports, Wildlife and Stormwater Management* brochures so as not attract wildlife. Last, buildings will be constructed of anti-reflective materials to avoid glare.

### 5.6.6 Methodology

The purpose of the *2021 Phase I ESA* was to identify recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), and/or controlled recognized environmental conditions (CRECs) indicative of releases or threatened releases of hazardous substances on, at, in, or to a subject site. The *Addendum to the Phase I ESA* was conducted to include the off-site utility footprint (WEIS-B, p. 1).

The *Phase I ESA* for the proposed Project was prepared in accordance with the American Society of Testing and Materials (ASTM) for ESA's, which include the Phase I ESA process, ASTM Standard E1527-2013 protocols and CFR Part 312, Title 40. The *2021 Phase I ESA* involved: a site reconnaissance, regulatory record review, interviews, and reporting. A REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment (WEIS-A, p. 1). A HREC is defined as a past release of any hazardous substances or petroleum products that has meeting unrestricted use criteria established by a regulatory authority, without subjecting the property in question to any required controls been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property in question to any required controls (WEIS-A, p.32). A CREC is defined as past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (WEIS-A, p. 32).

The *Work Plan for Subsurface Assessment* includes 47 soil borings ranging from 1 to 20 feet below ground surface. Analysis of the materials in these borings was used to develop soil management and vapor mitigation measures for future residential use on the Project site. (WEIS-C, p. 3).

### 5.6.7 Environmental Impacts

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

#### **Construction**

During construction, the demolition of the existing vacant site and construction of new residential and commercial uses on the site could involve the use of hazardous materials that could create a hazard to the public or environment if not properly managed and controlled. Construction and demolition of the Project site would involve the use of fuels, lubricants, and various other liquids for operation of construction equipment. These materials will be used onsite during construction by equipment. In addition, workers will commute to the Project via private vehicles and will operate construction vehicles and equipment on public streets. Hence, the potential exists for direct impacts to human health and the environment from accidental spills of small amounts of hazardous materials during Project construction through the transport, use, and disposal of construction-related hazardous materials such as fuels, lubricants, and solvents. However, several federal and state agencies prescribe strict regulations for the use and handling of hazardous materials. For instance, hazardous material transport, storage and response to upsets or accidents are primarily subject to federal regulation by the United States DOT Office of Hazardous Materials Safety in accordance with Title 49 Part 171-180 of the CFR. Title 49 Part 171-180 regulates the safe transportation of hazardous materials and appropriate documentation for all

hazardous waste that is transported is required. OSHA protects workers from being killed or seriously harmed at work, specifically 29 CFR §§1910 and 1926 address the handling of toxic materials. Cal OSHA, under 8 CCR §§337-340, specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings which lends to protecting the surrounding public and environment for accidental releases. Management of Hazardous Waste, under CCR Title 22 Division 4.5, establishes permits for the storage and disposal of hazardous material that cannot be disposed of in landfills. The California Hazardous Waste Control Law, under Chapter 6.95 of the Health and Safety Code, describes strict regulations for the safe transportation and storage of hazardous materials.

Lastly, demolition of the existing structure could release asbestos and lead-based paint into the environment which would have been used in the original building materials of the Sears structure. According to Weis Environmental, an asbestos survey for the property was completed in 2020 which did identify some asbestos containing materials. Such materials do not represent a threat to the public's health or the environment in their current state. These materials which tested positive for asbestos will be removed prior to full scale demolition in accordance with California Code of Regulations, Title 8, Subchapter 4 Construction Safety Orders, Article 4, Dusts, Fumes, Mists, Vapors and Gases, Section 1529 Asbestos, South Coast Air Quality Management District Rule 1403 and United States National Emissions Standards for Hazardous Air Pollutants [NESHAPS] (Code of Federal Regulations Title 40, Part 61).

A lead survey is not required prior to demolition, however the demolition contractor will by default work under conventional lead safe work practices required under California Code of Regulations, Title 8, Section 1532.1. The demolition contractor will profile all demolition derived waste and dispose of it as legally required.

Compliance with all applicable laws and regulations will reduce potential impacts associated with hazardous materials used during construction and impacts are considered less than significant related to construction.

### **Operation**

Non-residential tenants of the proposed buildings are unknown at this time so there is a potential that hazardous materials such as petroleum products, pesticides, fertilizer, and other household hazardous products may be stored and transported from the proposed facility during operation. However, these hazardous materials would not be manufactured at the Project site and would only be stored short-term before transport. And transportation of such materials would be required to comply with Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the CHSC in addition to all applicable Federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to the United States Department of Transportation (DOT) Office of Hazardous Materials Safety Title 49 of the CFR, and implemented by Title 13 of the CCR.

Should there be a need for short-term storage of hazardous materials, these materials are required to be stored in designated areas designed to prevent accidental release to the environment. The California Fire Code (CFC) requirements prescribe safe accommodations for materials that present a moderate explosion hazard, high fire or physical hazard, or health hazards. Compliance with all applicable federal and state laws related to the storage of hazardous materials would maximize containment and provide for prompt and effective clean-up if an accidental release occurs.



### ***Regulatory Records Review***

As part of the regulatory records review process a database report from Environmental Risk Information Services (ERIS) was obtained. ERIS searches a myriad of Federal, State, and local government environmental databases during the preparation of their deliverables (WEIS-A, p. 12).

#### *Federal Listings*

The Federal standard ASTM database search identified the Project site to be listed in Resource Conservation and Recovery Act (RCRA) database as a Non-Generator (NON GEN). The records identify the Project site as an implementor not a generator. The RCRA NON GEN database identifies persons or sites that do not presently generate hazardous waste. No spills or violations are noted. (WEIS-A, p. 13)

Four adjoining sites were listed on the RCRA small quantity generator (SQG), and RCRA NON GEN databases and include: Chevron Station, Jones Dry Cleaners, USA#1 Photo and Smart & Final. However, no spills, monitoring enforcement or violations associated where associated with any of these sites. Therefore, these properties were not considered to be a significant environmental concern to the Project site. (WEIS-A, pp. 13-14)

There are 20 properties in the surrounding area identified on various federal databases including RCRA treatments/storage/disposal (TSD), RCRA SQG, and RCRA NON GEN databases (WEIS-A, p. 14). However, these properties are not considered to be significant environmental concerns for the Project site due to factors such as distance to the Project site, orientation of the listed properties to the Project site, interpreted direction of groundwater flow, and/or regulatory case status.

#### *State, Tribal, and Local Listings*

The State, Tribal and local standard ASTM database search found the Project site to be listed on the Leaking Underground Fuel Tank (LUST), Historical Hazardous Substance Storage Information Database (HHSS), Delisted California Environmental Reporting System Tank (DELISTED CTNK), Historical Hazardous Substance Storage Container Information (HIST TANK) and Riverside County Local Oversight Program (LOP RIVERSIDE) databases. As indicated above, historical tank listings identify ten USTs were installed on the site in 1964. The fuel tanks were removed in 1985, the oil tanks were removed in 1987, and the fueling island and associated distribution lines were removed in 1994. Listings identify that in June 1985, leakage from on-site gasoline USTs was detected during tank removal and closure activities. In 1988, the leakage case was referred to the SARWQCB. Six groundwater monitoring wells were installed in 1985 but abandoned in 1992 when four new wells were installed. Five more wells were eventually installed and quarterly groundwater monitoring began in 1993. Remedial activities reportedly included removal of free product and impacted soil. A "No Further Action" letter indicating regulatory closure for the release was issued on June 26, 2003. The letter indicates that corrective action should be reviewed in the future if land use changes are proposed. (WEIS-A, p. 15). Thus, subsequent review from the SARWQCB is required and is detailed below.

Three adjoining sites were listed on the Recycling Center (RECYCLING), Geotracker Cleanup Sites (CLEANUP SITES), Collection, and Community Service Programs Voluntary Cleanup Program (VCP), EnviroStor, Delisted Storage Tanks (DELISTED TNK), LUST, HHSS, UST, California Environmental Reporting System Tanks (CERS TANK), HIST TANK, Statewide Environmental Evaluation and Planning System Underground Storage Tank List (UST SWEEPS), LOP RIVERSIDE and Riverside County Underground Storage Tanks List (UST RIVERSIDE) databases and include: Alexys Recycling, Crown Cleaners, and Chevron Station/R&T Oil, Inc. With the exception of Crown Cleaners, these sites are not considered a significant environmental concern to the Project site. Crown Cleaners had a previously

detected leak in 2003 and remediation via excavation of PCE-impacted soil took place in July 2003. PCE was not detected above 1.5 parts per million (ppm) in excavation confirmation samples so a case closure was provided via a “No Further Action” letter provided by SARWQCB in October 2003. In 2015, a subsurface evaluation identified PCR-impacted environmental media. However, only low groundwater PCE concentrations were reported. PCE that was previously identified in the subsurface at the Project site is potentially due to the release of dry cleaning solvents from Crown Cleaners. (WEIS-A, pp. 15-16).

There are three properties within the surrounding area identified on the CONTAINER RECY, LUST, AND UST SWEEPS databases. However, none of these properties are considered to have a negative contamination effect on the Project site, due to the nature of the site, and due to the distance from the Project site. (WEIS, p. 16).

#### *Non-ASTM Listings*

The Project site is also listed on a number of non-ASTM regulatory databases including the Facility Registry Service/Facility Index (FINDS/FRS), Hazardous Waste Manifest Data HAZNET, HIST MANIFEST, and Delisted Environmental Reporting System Hazardous Waste Sites (DELISTED HAZ) databases. Findings include storage, manifesting, and disposal of hazardous waste materials including alkaline solutions, aqueous solutions with organic residue, asbestos containing waste, paint sludge, hydrocarbon solvents, halogenated solvents, liquids with halogenated compounds, waste oil, latex, unspecified organic material and liquids, and other unspecified solvents and inorganic waste. Reviewed listings are consistent with ASTM database findings and previously identified historical information and there are no spills or violations indicative of potential releases noted. The Project site is also listed on the Historical California Hazardous Material Incident Report System (HIST CHMIRS) database which identifies a propane release to mechanical failure of a tank on a Winnebago R/V. This listing is not considered an environmental concern to the Site. (WEIS-A, p. 16)

Eight adjoining sites were listed on the: HAZNET, CDL, FED DRYCLEANERS, DRYCLEANERS, EMISSIONS, CERS HAZ, HWG RIVERSIDE, and MED WST RIVERSIDE non-ASTM databases and include William Byrne DDS/Riverside West Dental Group, an illegal drug lab at 6975 Capistrano Street, Crown Cleaners/Jones Dry Cleaners, Wing Stop, Smart & Final, Del Taco, and R&T Oil, Inc. With the exception of the Crown Cleaners/Jones Dry Cleaners site, none of these sites are considered to be significant environmental concern to the Project site. As previously mentioned above, PCE that was previously identified in the subsurface at the Project site is potentially due to the release of drycleaning solvents that occurred related to the Crown Cleaners/Jones Dry Cleaners site. (WEIS, p. 16).

There are an additional ten properties within the surrounding area identified on the FED DRYCLEANERS, MRDS, DRYCLEANERS, CERS HAZ, EMISSIONS, CDL, HWG RIVERSIDE, and MED WST RIVERSIDE databases. However, none of these properties are considered to have a negative contamination effect on the Project Site due to factors such as distance to the Project site, orientation of the listed properties to the Project site, interpreted direction of groundwater flow, and/or regulatory case status.

#### ***Historical Resource Review***

Historical research was conducted in order to identify previous uses of the Project site and surrounding area from present to when the site was first developed or 1940 (whichever is earlier). Historical aerial photographs show the Project site was previously used for agricultural purposes. From 1901 to 1947, several small structures are depicted on the southern portion of the site and roads appear along the southern and western portion of the site. small structures are also depicted on the adjoining properties. In 1953, an increased number of small structures appear on the western and southern portions of the

site and significant residential development is reflected on adjoining properties. Two large structures are visible on the southern adjoining property. In 1967, the existing Sears structures and fuel islands are reflected and adjoining properties appear developed consistent with current development. (WEIS, p.21).

During historical agricultural activities throughout the State of California, various pesticides and more specifically organochlorine pesticides (OCPs) were commonly applied during the normal course of agricultural operations. Such compounds have since been banned from production and use in the United States. Based on regulatory and historical research no accidental spill or release of pesticide products is believed to have occurred on the Project site and the potential presence of residual agricultural chemicals in Site soils is not considered to be a REC in connection with the Project site. However, as outlined below in Work Plan, and pursuant to SARWQCB direction, future soil sampling will be screened for potential presence of residual agricultural chemicals. (WEIS, p.21). For the Project site soil latest samples see the findings of the Comprehensive Subsurface Assessment below.

### ***Project Site Reconnaissance***

A Project site reconnaissance was conducted on September 22, 2021 which consisted of observing the exterior grounds on foot, the accessible portions of the interior of the Sears Department store building, and publicly accessible areas surrounding the Project site. Keys and/or property management with access to the Sears Automotive Service Center building and limited portions of the retail building basement level were not available during the site visit. (WEIS-A, p.23).

Within the Sears Department store, interior floor drains are present in the bathrooms and former maintenance areas. Reportedly, two sumps are present in the basement but were not accessible during site reconnaissance. A chiller and disconnected boiler are present in the retail building basement level. Two public and two freight hydraulic elevators were observed in the Sears Department Store building. With the exception of the central freight elevator, maintenance rooms were inaccessible during site reconnaissance. No staining was observed in the accessible elevator maintenance room. A loading dock and solid waste receptacle are present at the northern portion of the retail building. A trash compactor is present in the retail building basement. Minor staining was observed of the concrete floor in the trash compactor area. Exterior stormwater drains are also present throughout the parking area. Within the Sears Automotive Service Center, there is reportedly one elevator and nine hydraulic hoists present. (WEIS-A, pp.23-25).

Hence, the *2021 Phase I ESA* concluded there is no evidence of current or controlled RECs's in connection with the Project site. But the former presence of underground storage tanks at the Project site and the previous release of petroleum hydrocarbons, is considered to be a HREC. The SARWQCB previously issued a "No Further Action" letter for the site based on existing commercial land use. But any change to land use would require additional assessment by SARWQCB. An *Addendum to the 2021 Phase I ESA* (Addendum) was conducted to include assessment of the offsite alignment for utilities. The Addendum provided the same conclusion. (WEIS-B, pp. 1-2).

### ***Work Plan***

As the Project proposes a change in land use from commercial-retail to residential, an assessment from the SARWQCB was conducted in accordance with the recommendations of the *2021 Phase I ESA*, *Addendum*, and City of Riverside General Plan DEIR Mitigation Measure MM Haz 1. In May of 2022, the Project site was entered into the SARWQCB Site Cleanup Program through an Oversight Costs Reimbursement Agreement. A project scoping teleconference between the Property Owner and



SARWQCB was conducted on May 31, 2022 and a draft sampling and analysis plan was provided to the SARWQCB as a follow up to this scoping teleconference.

Following review of the submittal, SARWQCB directed a Work Plan for the proposed land uses be completed. The purpose of the Work Plan is to document current environmental conditions in the soil and soil gas for future residential redevelopment. The data collected during the assessment was compared to various screening criteria pertaining to the protection of human health and the environment; more specifically as it relates to potential vapor intrusion. More specifically, the data was used to develop soil management and vapor mitigation measures (if necessary) during anticipated future redevelopment activities. SARWQCB requested a total of 47 sample borings be placed around the site to measure soil gas and conditions of the soil. Borings were placed at depths ranging from 1 to 20 feet below ground surface. (WEIS-C, p. 3, 7, 9).

The *Comprehensive Subsurface Assessment* implemented the SARWQCB directed Work Plan which resulted in the following findings (WEIS-D, pp. 3-4):

- With the exception of some staining and odors indicative of petroleum hydrocarbons in a limited area of the Site (former UST area), no suspect soil conditions were noted during the assessment work. The residual petroleum impacts were noted at depths of 15 to 30 feet in just a few of the 49 borings drilled at the Site. Soil at these depths will not be encountered during future grading activities. At one of the sampling locations (near a former fueling dispenser), stained and odorous soil was observed/noted at depths of 5 and 10 feet. Soil in this limited area may be encountered during future grading activities and can be segregated and removed from the Site under conventional soil management protocols.
- No indications of chemicals releases were noted in any other areas of the Site (outside of the former UST system area).
- Low concentrations of gasoline and diesel range hydrocarbons were detected in six of the groundwater samples collected proximate to the former UST system area. No benzene or methyl tert-butyl ether (primary VOCs of concern at UST release locations as referenced in the State of California Low-Threat Underground Storage Tank Case Closure Policy [Policy]) were detected in the groundwater samples.
- PCE was detected in three of the groundwater samples at concentrations below the maximum contaminant level (drinking water standard). These locations are situated topographically downgradient (northwest) of the known chlorinated solvent release location (Crown Cleaners - 5190 Arlington Avenue). The release location is situated at distances ranging from approximately 650 to 950 feet from various locations along the southern Site boundary. Other groundwater samples further downgradient and more proximate to the former UST system contain the chlorinated VOC trichloroethene (TCE) which is a breakdown product of PCE. Other VOCs detected in groundwater at the Site that are consistent with the solvent release at 5190 Arlington Avenue include Freon-11 and Freon-113. In the absence of PCE in each of the soil samples obtained and analyzed for VOCs at the Site and no substantial TCE detected in vadose zone soil at the Site (i.e., no source identified), it is inferred that the presence of chlorinated solvents in groundwater at the Site resulted from the off-Site release at the drycleaners facility to the south and southeast of the Site. The cleaners property is currently under the environmental oversight of the California Department of Toxic Substances Control (Site Code 401875 – Crown Cleaners/Heritage Plaza). Recent assessment was completed at this property in early 2023 and at this time, remedial actions pertaining to vapor intrusion considerations are being evaluated.

- Several VOCs were detected in soil gas samples obtained from throughout the Site. As anticipated, the highest concentrations of petroleum related VOCs were detected in and around the former UST system area. Benzene, ethylbenzene and naphthalene are the primary VOCs of concern at UST release locations as referenced in the State of California Low-Threat Closure Policy. Naphthalene was not detected in any of the soil gas samples. All detected concentrations of benzene and ethylbenzene are below both residential and commercial health risk based screening levels as published in the Policy (assuming that a bio attenuation zone is present). The presence of a bio attenuation zone was confirmed by way of analysis of soil gas samples for the presence of oxygen (all greater than the four percent target percentage noted in the Policy) and analysis of shallow (one to five feet) soil for the presence of petroleum hydrocarbons.
- PCE is prevalent in soil gas throughout the Site. The highest PCE concentrations are along its southern boundary, further supporting the conclusion that Site impacts are associated with historical chlorinated solvent releases at 5190 Arlington Avenue. A few TCE detections were also noted in soil gas. Other prevalent VOCs detected in soil gas at the Site that are consistent with the solvent release at 5190 Arlington Avenue include Freon-11 and Freon-113. Similar to groundwater impacts, it is inferred that the presence of chlorinated solvents in soil gas throughout the Site resulted from the off-Site release at the drycleaners facility to the south and southeast of the Site.

### Conclusion

Impacts from construction operations are considered less than significant from accidental releases of hazardous materials used during construction due to existing regulations in place to protect workers, the public and the environment as discussed above. The Project is also not expected to result in groundwater impacts and based on the site investigations, no groundwater active remediation is warranted.

Existing residual petroleum impacts and chlorinated solvent impacts may be attributed to the former UST system at the Project site and off-site drycleaners facility at 5190 Arlington Avenue (WEIS-D, pp. 4-5). However, with implementation of mitigation measures **MM HAZ-1** and **MM HAZ-2** which require soil decontamination and vapor barriers, impacts from existing residual petroleum and chlorinated solvents would be less than significant. Thus, through regulatory requirements and implementation of mitigation measures **MM HAZ-1** and **MM HAZ-2**, the proposed Project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment either through construction or operations. Therefore, impacts are **less than significant with incorporation of mitigation**.

***Threshold: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?***

The Project site is located approximately one mile westerly of the Riverside Municipal Airport (RMA) and approximately 5,151 feet southeast of runway 9-27. Pursuant to the RCALUCP, the Project site is located within Land Use Compatibility Zones B1, C and D, with majority of the Project site within B1. **Table 5.6-A**, above, identifies basic land use compatibility criteria such as prohibited uses, residential density standards, non-residential intensity standards, and other development conditions within the Compatibility zones. Since the Project site is located within RMA's Land Use Compatibility Zones B1, C and D, the Project is required to undergo review by the Riverside County Airport Land Use Commission (ALUC) for a consistency determination. On January 12, 2023, ALUC determined the proposed Project to

be inconsistent with the RCALUP and is discussed in detail below. (ALUC-B, p. 1). ALUC also issues a letter to Riverside City Council expressing their concerns about the proposed Project (ALUC-D).

*Site Density/Intensity*

**Table 5.6-C, Residential Density Consistency** below, identifies the Project’s proposed residential density measured by dwelling units per acre (du/ac) across the three Compatibility Zones and the Project’s consistency with ALUC policy for each of those zones.

**Table 5.6-C, Residential Density Consistency**

Zone	Proposed Dwelling Units	Proposed Project Density (du/ac)	Maximum Allowed Density (du/ac)	Consistent
B1	382	28.0	0.05	No
C	1	2.0	0.2	No
D	5	10	Below 0.2 or Above 4.0	Yes
<b>Total Dwelling Units</b>	<b>388</b>			

Source: ALUC-C, pp. 2-3

As reflected in **Table 5.6-C** above, the Project is consistent with ALUC residential density standards for Zone D. However, the Project is inconsistent with residential density standards for Zones B1 and C. (ALUC-C, pp. 2-3).

The proposed clubhouse/fitness/leasing office and grocery uses are sited in Zone B1 while proposed retail uses lie within Zone C. **Table 5.6-D, Non-Residential Intensity Consistency**, identifies the Project’s proposed non-residential intensity (people per acre) across these two Compatibility Zones and the Project’s consistency with ALUC policy for each of those zones.

**Table 5.6-D, Non-Residential Intensity Consistency**

Proposed Non-Residential Use	Project’s Average Acre Intensity	Allowable Maximum Average Acre Intensity	Consistent	Project’s Single Acre Intensity	Allowable Maximum Single Acre Intensity	Consistent
Clubhouse/Fitness/Leasing Area (ALUC Zone B1)	49	25	No	769	50	No
Grocery (ALUC Zone B1)	81	25	No	203	50	No
Retail (ALUC Zone C)	134	75	No	83	150	Yes

Source: ALUC-C, pp. 3-4



As reflected in **Table 5.6-D** above, the Project's proposed retail uses are consistent with ALUC non-residential intensity standards for development in Zone C. However, the Project's proposed clubhouse/fitness/leasing area and grocery uses are not consistent with ALUC non-residential intensity standards for Zone B1. A second method for determining total occupancy involves multiplying the number of parking spaces provided or required (whichever is greater) by average vehicle occupancy (assumed to be 1.5 persons per standard vehicle). Based on a total of 815 vehicle parking spaces provided, the total occupancy would be estimated at 1,223 persons, resulting in an average intensity of 70 persons per acre. Utilizing this second method for determining total site occupancy still results in an inconsistency with the non-residential intensity criteria since the maximum average acre intensity criterion for Zone B1 is 25 people per acre and Zone C is 75 people per acre. (ALUC-C, pp. 3-4).

Thus, the Project is not consistent with residential density or non-residential site intensity requirements.

#### *Airport Noise*

As shown in **Table 5.6-A**, the RCALCUP has classified Zone B1 with a high noise impact, Compatibility Zone C has a moderate noise impact, and a moderated risk level and Zone D has a moderated noise impact and a low risk level. As previously indicated, most of the Project site lies within Compatibility Zone B1. As shown in **Table 5.6-B** above, Compatibility Zone B1 is the Inner Approach/Departure Zone of the RMA. Zone B1 is considered to be a "High Noise Impact" area since it lies mostly within the 60 Community Noise Equivalent Level (CNEL) contour and because single-event noise within this area is typically sufficient enough to disrupt a wide range of land use activities including indoor land uses if windows are open. (ALUC-C, pp. 5-6).

The Project proposes a number of outdoor recreational areas that may expose users to a moderate level of interference from aircraft noise. Aircraft noise may also impact indoor residential activities in the event windows are open (or if they are on an outdoor balcony/patio). Although standard construction is normally considered to provide for a 15 decibel reduction from exterior noise levels, implementation of mitigation measure **MM HAZ-3** would incorporate noise attenuation measures into the design of the residences as may be necessary to ensure interior noise levels from aircraft operations are at or below 45 CNEL. (ALUC-C, p. 6).

RMA policy 2.1 identifies that while the limit of 60 dB CNEL is set by Countywide Policy 4.1.4 as the maximum noise exposure considered normally acceptable for new residential land uses, for RMC, the criterion is instead 65 dB CNEL. This higher threshold recognizes that ambient noise conditions in the area are relatively high because of other major noise sources, particularly railroads and freeways. (RCALUCP, p. 3-30). However, the actual noise levels from airplanes is in the 55 dBA CNEL to 62 dBA CNEL range, which does not exceed the RMA or the City's standards for exterior noise (dBA, p. 13). Thus, the Project's outdoor uses would not be impacted by Airport Noise since noise levels from airplanes are under RMA and City standards.

#### *Safety*

Compatibility Zone B1 is also associated with a "High Risk Level" because it encompasses areas overflowed by aircraft at low altitudes (typically only 200 to 400 feet above runway). Approximately 10 to 20 percent of off-runway general aviation accidents near airports take place here so object heights are restricted to as little as 50 feet. The intent and purpose of Compatibility Zone B1 is to restrict residential density in order to limit the potential risk of an off-field aircraft landing. The Project proposes some three-story residential buildings within Compatibility Zone B1. The elevation of Runway 9-27 at its easterly terminus is 815.8 feet above mean sea level (AMSL). At a distance of approximately 5,151 feet from the runway to the site, Federal Aviation Administration (FAA) review would be required for any

structures with top of roof exceeding 867 feet AMSL. The Project site elevation is 791 feet AMSL. With a maximum building height of 41.5 feet, the resulting top point elevation is 832.5 feet AMSL. Thus, structures do not exceed height requirements so FAA review is not required. However, buildings with more than two aboveground habitable floors are identified as a “prohibited use” in Compatibility Zone B1. Since the Project’s proposes three-story residential buildings, the Project is inconsistent with this ALUC criterion. (ALUC-C, pp. 5-6).

The Project proposes a variety of rooftop and carport solar panels with a fixed tilt of 10 degrees with no rotation, and an orientation of 90 degrees throughout the site. Based on the FAA’s *Interim Policy for Review of Solar Energy System Projects on Federally Obligated Airports*, no glare potential or low potential for temporary afterimage, referred to as “green” level, are acceptable levels of glare on final approach (within 2 miles from end of runway) for solar facilities located on airport property and is the recommended standard for properties near airports. Potential for temporary after-image referred to as “yellow level” and potential for permanent eye damage referred to as “red level” are not acceptable levels of glare on final approach. No glare is permitted at air traffic control towers. A solar glare study completed by Forge Solar was based on a 2-mile straight in approach in accordance with FAA Policy to runways 9-27, runways 16-34, as well as analyzing glare impacts to the air traffic control tower. All times are in standard time. The analysis concluded that some potential “green level” glare would occur within the 2 mile approach to runways 9-27 representing less than 9 percent of total daylight time and no glare would occur at the air traffic control tower. The solar panels do not emit electromagnetic waves over distances that could interfere with radar signal transmissions, and any electrical facilities that do carry concentrated current would be buried beneath the ground and away from any signal transmission. Further, there are no radar transmission or receiving facilities within the site. Hence, the Project is consistent with glint/glare reflectivity standards and will provide no electrical or communication interference.

Because the Project site’s infiltration rates are so low, the Project has been authorized to utilize Modular Wetlands as a form of stormwater treatment. Hence, storm water will be conveyed via underground pipes to Modular Wetlands located throughout the Project site. where storm water will be captured and treated in underground chambers before being conveyed to the existing storm drain facilities in Streeter Avenue; rather than through the use of above ground water quality basins. The use of an underground system would not contain surface water or attract wildlife. Hence, the Project’s water quality treatment would not constitute a hazard to flight. (ALUC-C, p. 6).

The Project is also required to provide qualifying open space areas based on percentages identified in **Table 5.6-A**, above. Qualifying open space means areas that have a minimum shape of 75 feet in width by 300 feet in length with no objects greater than four feet in height of up to four inches in diameter in order to provide a safe area for aircraft to land in the event of an emergency. The Project is required to provide a minimum of 4.99 acres of qualifying open space. However, the Project provides just over 2 acres which does not meet minimum quantity or the qualifying open space requirements. Thus, the project is inconsistent with ALUC open area requirements. (ALUC-C, p. 6).

#### *City Land Use and Zoning Policies*

The Project proposes an amendment to the General Plan Land Use designation from (C)Commercial to (MU-V) Mixed Use Village, and a rezone (CG) Commercial General to (MU-V) Mixed Use-Village. The City’s General Plan MU-V land use designation and MU-V zoning designation allows for a maximum 30 residential dwelling units per acre with retail, and office uses in the same building allowing for horizontal integration as appropriate with two (2) to three (3) stories in height. The Project’s proposed two-story

town homes located in Compatibility Zone D with resulting density of 13 du/ac, are consistent with the Zone D residential density and height criteria. However, the MU-V land use and zoning designations allowing for 30 dwelling units per acre and up to three-story structures, is inconsistent with the maximum residential density and height criteria for Compatibility Zones B1 and Zone C, as discussed above. Further, the General Plan Amendment and Rezone would be inconsistent with City Municipal Code 19.149 or 19.150; specifically sub-sections 19.149.020, 19.149.030, and 19.150.020.B and inconsistent with General Plan policies related to airports specifically LU-22.2, LU-22.3, and LU-22.5. Thus, these two actions would result in inconsistency with RCALUCP plan and General Plan. (ALUC-C, pp. 7-8; GP 2025, pp. LU-36 – LU-39, LU-56).

### *Conclusion*

ALUC Commissioners issued a letter finding the Project to be inconsistent with ALUC policy and a separate letter expressing their concerns over the Project. Pursuant to the PUC Sections 21676 and 21676.5, the City may overrule the ALUC's inconsistency determination if, after a public hearing, the City makes findings that the Project is consistent with the purposes set forth in PUC sections 21670 and 21670(a)(2) which provides that the purpose of the State Aeronautics Act is to protect public health, safety and welfare by ensuring the orderly expansion of airports and the adopting of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. The existing Sears Department Store and Automotive Service Center, as well as the existing residential, commercial and office uses surrounding the Project site are considered to be incompatible with ALUC policy so the area is already devoted to incompatible uses. In the event the City pursues and overrule to ALUC's determination, ALUC has provided conditions of approval for which the Project shall be required to adhere.

Hence, the Project would be inconsistent with ALUC and City land use policy. However, the existing Sears Department Store and Automotive Service Center, as well as the existing residential, commercial, and office uses surrounding the Project site are considered to be incompatible with ALUC policy. So while the proposed Project resulted in an inconsistency determination from ALUC, it is consistent and compatible with the existing surrounding land uses. Regardless, even with implementation of mitigation measure **MM HAZ-3**, the Project would result in a safety hazard or excessive noise for people residing or working in the project area. Therefore, impacts would be **significant and unavoidable**.

### **5.6.8 Recommended Mitigation Measures**

An Environmental Impact Report is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines* § 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts related to Hazards and Hazardous Materials.

Mitigation measures **MM HAZ-1** and **MM HAZ-2** are required to reduce impacts related to exposure to the public or the environment involving the release of hazardous materials to less than significant due to existing residual petroleum and chlorinated solvent impacts. Mitigation measure **MM HAZ-3** shall be implemented to eliminate or reduce potentially significant impacts related to airport noise hazards.

**MM HAZ-1     Decontamination of Soil.** During grading activities at the former UST system area and around one boring location the soil shall be handled and mitigated in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166 (VOC Emissions from Decontamination of Soil) Mitigation Plan. Petroleum impacted soil shall be



segregated from non-impacted soil using the convention soil management soil practices. However, petroleum impacted soil at greater depths shall remain in place.

**MM HAZ-2 Vapor Barriers.** In order to mitigate the past contamination on the site related to the Sears Auto Service Center, the City building department shall ensure that final construction drawings on the Project reflect requirements from the Santa Ana Regional Water Quality Control Board (SARWQCB). Requirements from the SARWQCB could include conventional vapor barriers with passive sub-slab venting incorporated into foundation design of the proposed structures on the Project site.

**MM HAZ-3 Airport Noise.** Prior to issuance of a building permit for any residential building or unit, an acoustical analysis shall be conducted by a noise specialist meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5 to confirm that the noise insulation proposed in the final design is sufficient to achieve interior noise levels at or below 45 CNEL and exterior noise levels at or below 65 CNEL. Interior noise attenuation measures identified in said acoustical analysis shall be incorporated into the design of the residences, to the extent such measures are necessary, to ensure that interior noise levels are at or below 45 CNEL. Measures may include, but not be limited to, upgraded building façade elements (windows, doors, and /or exterior wall assemblies) with Sound Transmission Class (STC) rating of 35 or higher. If the interior limit can be achieved only with the windows closed, then the building design shall include mechanical ventilation that meets California Building Code requirements. Exterior noise attenuation measures, which shall be unit/structure specific, may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 CNEL.

### 5.6.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented

Implementation of local, state, and federal regulations, project design features, General Plan DEIR mitigation measures and project-specific mitigation measures listed above, will reduce exposure to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials. Therefore, Project impacts will be **less than significant with incorporation of mitigation**.

Implementation of local, state, and federal regulations, project design features, and project-specific mitigation measures listed above, will reduce exposure to airport hazards. However, due to the Project's proximity to the Riverside Municipal Airport and its location within the RCALUCP, the Project would still result in a safety hazard or excessive noise for people residing or working in the Project area. Therefore, Project impacts will be **significant and unavoidable** and a statement of overriding considerations will be required prior to Project approval.

## 5.7 Land Use and Planning

The focus of this section is to analyze potential impacts related to land use and planning. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics.

### 5.7.1 Setting

The Project site entails an approximately 17.43 gross acre within the City of Riverside. Future development of all land within the City is guided by the City's 2025 General Plan (2025 GP) which was adopted in 2007 and Phase I of the Updated General Plan adopted in 2021 (GPU1). The GP outlines a broad framework for planning the future of the City expressing the City's vision of its long-term physical form and development and serves as a basis for decision making. The GP was developed in accordance with California state law and is comprised of the following elements: Land Use and Urban Design, Housing, Circulation and Community Mobility, Arts and Culture, Education, Open Space and Conservation, Air Quality, Public Facilities and Infrastructure, Parks and Recreation, Historic Preservation, Public Safety, and Noise.

### Existing and Surrounding Land Uses

The City of Riverside (City) is located in the northwestern portion of Riverside County. The City is bounded on the north by the Cities of Jurupa Valley, Colton, and Grand Terrace and the unincorporated community of Highgrove, to the east by the City of Moreno Valley, to the south by the unincorporated community of Woodcrest, and to the west by the Cities of Corona and Norco.

The existing Project site includes two existing vacant commercial buildings located on the 17.43 gross acre parcel associated with the former Sears Department Store and Automotive Service Center constructed in 1964. These structures are eligible for listing in the National Register for Historic Places, California Register for Historic Resources, and the City of Riverside Historical Landmarks. The former department store was located in the central building, now a vacant structure. The interior of the vacant department store building includes retail areas, warehouse and supply storage areas, sub-grade basement areas, public and freight hydraulic elevators, and restrooms. The basement area contains a disconnected boiler, trash compactor, and emergency generator. A smaller automotive service center structure is located on the western portion of the property. This building includes six bay doors opening to a concrete-paved former service area with secondary containment structures, nine hydraulic hoists, and a sub-grade oil/water separator. (WEIS-A, p. 4).

The Project site is located within the Riverside County Airport Land Use Compatibility Plan (RCALUCP); specifically, the Riverside Municipal Airport (RMA) and located approximately one mile from the airport runway. The Project site is located within Land Use Compatibility Zones B1, C, and D (refer to **Figure 3.0-7** in Section 3.0 – Project Description of this Draft EIR) which restricts maximum residential density and non-residential intensity. As such, the Project has been reviewed by the Riverside County Airport Land Use Commission (ALUC) to determine compatibility with the RCALUCP. The ALUC determined via a public hearing January 12, 2023, that the Project is inconsistent with the RCALUCP. A detailed discussion is provided in Section 5.6 – Hazards and Hazardous Materials of this Draft EIR.

## Existing General Plan Land Use and Zoning Designations

The Project site has a General Plan Land Use Designation of (C) – Commercial and a zoning designation of (CG) - Commercial General as reflected in **Figure 3.0-5** and **Figure 3.0-6** of Section 3.0 – Project Description of this Draft EIR.

## Proposed Land Use Applications

The proposed Project includes the following entitlement applications for consideration by the City of Riverside:

- General Plan Amendment (GPA): Proposes to amend the general plan land use designation from (C) - Commercial to (MU-V) - Mixed Use-Village as per **Figure 3.0-8** in Section 3.0 – Project Description of this Draft EIR.
- Re-Zone (RZ): Proposes to rezone the site from (CG) - Commercial General to (MU-V) Mixed Use-Village as per **Figure 3.0-9** in Section 3.0 – Project Description of this Draft EIR.
- Site Plan Review (PPE): Proposes to develop the 17.43-gross acre (17.37 net acre site after dedication of 0.05 acres along Arlington Avenue for roadway right-of-way) with a 576,203 square foot (sf) mixed-use apartment and commercial development. Proposal includes development of 27 residential apartment buildings consisting of 2- and 3-story structures that would provide for a total of 388 residential dwelling units, one clubhouse building, and two commercial buildings providing for 546,474 sf of residential use and 4,409 sf associated clubhouse/leasing building, and 25,320 sf of commercial-retail use as per **Figure 3.0-10** in Section 3.0 – Project Description of this Draft EIR.
- Tentative Parcel Map No. 38638 (TPM): Proposes to subdivide the 17.37-net acre site into 2 parcels for financing, conveyance, and phasing purposes. Parcel 1 will consist of 14.44 net acres for residential development and Parcel 2 will consist of 2.93-net acres for commercial-retail development as per **Figure 3.0-11** in Section 3.0 – Project Description of this Draft EIR in Section 3.0 – Project Description of this Draft EIR.
- Certificate of Appropriateness (COA): Proposal to demolish the existing, vacant, Sears structures. The Sears structures were built in 1964 and have been deemed eligible for listing in the California Register of Historic Resources under Criterion 3, National Register for Historic Places, and the City of Riverside Historical Landmarks.

## 5.7.2 Related Regulations

### Federal Regulations

No federal regulations would be applicable to land use and planning with respect to the proposed Project.

### State Regulations

Article XI, Section 7 of the California State Constitution is the primary authority for cities and counties to regulate land use. California State Planning and Land Use Law (Government Code § 65000 et seq.) sets forth minimum standards to be observed in local land use regulatory practices, reserving in cities and counties the maximum degree of control in such matters (CGC).



## Regional Regulations

### ***Riverside Municipal Airport Land Use Compatibility Plan***

The Riverside County Airport Land Use Commission (ALUC) is the lead agency responsible for airport land use compatibility planning in Riverside County. The fundamental purpose of ALUC is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. The basic function of the airport land use compatibility plans is to promote compatibility between airports and the land uses that surround them. Compatibility plans serve as a tool for use by airport land use commissions in fulfilling their duty to review proposed development plans for airports and surrounding land uses. Additionally, compatibility plans set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development. In March 2005, ALUC adopted the Riverside County Airport Land Use Compatibility Plan (LUCP); hereinafter referred to as the RCALUCP. The compatibility zones and associated criteria set forth in the LUCP provide noise and safety compatibility protection.

### ***2012-2035 Regional Transportation Plan/Sustainable Communities Strategy***

The SCAG regional council adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the residents in the region. The long-range vision plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity, environmental justice, and public health. The goals included in the 2016 RTP/SCS are meant to provide guidance for considering projects within the context of regional goals and policies.

The RTP provides an opportunity to identify transportation strategies today that address mobility needs for the future. The SCS is a new element of the RTP that demonstrates the integration of land use, transportation strategies, and transportation investments within the Plan. This requirement was put in place by the passage of Senate Bill (SB) 375, with the goal of ensuring that the SCAG region can meet its regional greenhouse gas reduction targets set by the California Air Resources Board (CARB). The SCS exceeds the targets issued by CARB (which are 8 percent reductions by 2020 and 13 percent reductions by 2035), resulting in a 9 percent reduction by 2020 and 16 percent by 2035.

## Local Regulations

### *City of Riverside General Plan*

The City of Riverside General plan contains policies that are considered applicable to the proposed Project, as identified below (GP 2025 pp. LU-26 – LU-37):

### ***Land Use/Urban Design Element***

Objective LU-8	Emphasize smart growth principles through all steps of the land development process
Policy LU-8.2	Avoid density increases or intrusion of nonresidential uses that are incompatible with existing neighborhoods.
Policy LU-8.3	Allow for mixed-use development at varying intensities at selected areas as a means of revitalizing underutilized urban parcels.

Objective LU-9	Provide for continuing growth within the General Plan Area, with land uses and intensities appropriately designated to meet the needs of anticipated growth and to achieve the community's objectives.
Policy LU-9.3	Designate areas for urban land uses where adequate urban levels of public facilities and services exist or are planned, in accordance with the public facilities and service provisions policies of this General Plan.
Policy LU-9.4	Promote future patterns of urban development and land use that reduce infrastructure construction costs and make better use of existing and planned public facilities when considering amendments to the Land Use Policy Map (Figure LU-10).
Policy LU-9.7	Protect residentially designated areas from encroachment by incompatible uses and from the effects of incompatible uses in adjacent areas. Uses adjacent to planned residential areas should be compatible with the planned residential uses and should employ appropriate site design, landscaping and building design to buffer the non-residential uses.
Objective LU-10	Provide for appropriate timing of development in accordance with the future land uses designated in this Land Use Element
Policy LU-10-1	Discourage the premature development of non-urbanized areas and encourage growth, through such programs as the Residential Infill Incentive Program, first in undeveloped and under-developed areas within, adjacent to or in close proximity to existing urbanized neighborhoods.
Objective LU-22	Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port, Riverside Municipal and Flabob Airports.
Policy LU-22.2	Work cooperatively with the Riverside County Airport Land Use Commission in developing, defining, implementing, and protecting airport influence zones around the MARB/MIP, Riverside Municipal and Flabob Airports and in implementing the new Airport Land Use Compatibility Plan.
Policy LU-22.3	Work to limit the encroachment of uses that potentially pose a threat to continued airport operations, including intensification of residential and/or commercial facilities within identified airport safety zones and areas already impacted by current or projected airport noise.
Policy LU-22.5	Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted in the Public Safety Element (Figure PS-6A – Riverside Municipal and Flabob Airport Safety Zones and Influence Areas; and Figure PS-6B – March ARB/IPA Airport Safety Zones and Influence Areas) for consistency with all applicable airport land use compatibility plan policies adopted by the Riverside County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible.

Policy LU-22.7	Prior to the adoption or amendment of the General Plan or any specific plan, zoning ordinance or building regulation affecting land within the airport influence areas of the airport land use compatibility plan for Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport, refer such proposed actions for determination and processing by the ALUC as provided by Public Utilities Code Section 21670.
Policy LU-22.8	The City may from time to time elect to voluntarily submit proposed actions or projects that are not otherwise required to be submitted to the ALUC under Airport Land Use law in the following circumstances: <ul style="list-style-type: none"><li>a. Clarification: If there is a question as to the purpose, intent, or interpretation of an airport land use compatibility plan (ALUCP) or its provisions; or</li><li>b. Advisory: If assistance is needed concerning a proposed action or project relating to Airport Land Use matters; or</li><li>c. ALUC Request: The ALUC requests that certain types be voluntarily submitted for review. These actions are identified in the ALUCP as “major land use action.”</li></ul>
Policy LU-22.9	All development proposals within an airport influence area and subject to ALUC review will also be submitted to the manager of the affected airport for comment.
Objective LU-28	Preserve and enhance the quality and character of Riverside by ensuring compliance with all relevant codes and regulations.
Policy LU-28.2	Encourage the rehabilitation or replacement of dilapidated housing units and buildings, discouraging further deterioration. Where necessary, seek to remove unsafe structures.
Objective LU-32	Preserve existing residential areas within the Airport Neighborhood.
Policy LU-32.1	Encourage developers of single-family residences to include a higher level of sound attenuation in new homes than required by City standards.
Objective LU-35	Maintain Arlington's sense of community through careful and coordinated planning that builds upon the neighborhood's key assets and reinforces its historic development patterns.
Policy LU-35.1	Focus commercial development at major intersections, discouraging “strip” commercial development

*City of Riverside 2025 General Plan EIR*

The are no applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to Land Use and Planning.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.



*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUI EIR that pertain to Land Use and Planning.

*City of Riverside Municipal Code*

**Title 17 – Grading.** This title sets forth rules and regulations intended to further implement the goals and objectives of the General Plan, to control evacuation, grading, and earthwork construction, including fills and embankments. It also establishes the administrative procedures for grading plan approval, issuance of permits, inspections, and establishes penalties for unauthorized grading activity. The purpose of this title is to protect life, limb, property, the public welfare, and the physical environment by regulating grading on private property. It is further the purpose of this title to regulate hillside and arroyo grading in a manner which minimizes the adverse effects of grading on natural landforms, soil erosion, dust control, water runoff and construction equipment emissions.

**Title 18 – Subdivision.** Establishes the comprehensive subdivision regulations of the City in conformance with current State planning, zoning, subdivision, and related development laws. The purpose of this Subdivision Code is to regulate and control the design and improvement of subdivisions within the City.

**Title 19 – Zoning.** The purpose of the Zoning Code is to encourage, classify, designate, regulate, restrict and segregate the highest and best location and use of buildings, structures and land for agriculture, residence, commerce, trade, industry, water conservation or other purposes in appropriate places; to regulate and limit the height, number of stories and size of buildings and other structures hereafter erected or altered; to regulate and determine the size of yards and other open spaces; and, to regulate and limit the density of population and for such purpose to divide the City into zones of such number, shape and area as may be deemed best suited to carry out these regulations and provide for their enforcement. These regulations encourage the most appropriate use of land; conserve and stabilize the value of property; provide adequate open spaces for light and air and prevent and fight fires; prevent undue concentration of population; lessen congestion on streets; facilitate adequate provisions for community utilities and facilities such as transportation, water, sewerage, schools, parks and other public facilities; and promote the public health, safety and general welfare, all as part of the General Plan of the City.

**Chapter 19.120 – Mixed Use Zones.** Mixed-use zones are established to provide development opportunities for integrated, complementary residential and commercial development on the same parcel or a contiguous group of parcels. Singular, stand-alone uses are permitted when they foster an overall mixture of uses in the zone. A wide range of uses is permitted, and it is the intent of these zones to foster a mixture of product types. Development solely as commercial or residential districts is strongly discouraged. Design and development standards for all three zones are directed toward encouraging pedestrian activity and ensuring that mixed commercial and residential uses are designed to be compatible both within the development and with other surrounding areas.

**Chapter 19.120.050 Mixed Use Development Standards.** This chapter identifies the development standards applicable to all development in the mixed-use zones.

**Chapter 19.149 – Airport Land Use Compatibility.** The purpose of this chapter is to establish and implement the requirements of the Riverside County Airport Land Use Compatibility Plan (RCALUCP) for airports that affect land uses within the City of Riverside. Airports that affect land uses within the City of

Riverside are the Riverside Municipal Airport, Flabob Airport, and the March Air Reserve Base/Inland Port Airport.

**Chapter 19.149.020 – Airport Land Use Compatibility Plan (ALUCP).** For property located within a compatibility zone and subject to airport land use compatibility plan policies and criteria, land use, density, and intensity limitations of the ALUCP may be more restrictive than what would otherwise be allowed per City zoning designation applicable to the property. In addition to complying with the Zoning requirements of this title, proposed uses and development on property within an airport compatibility zone must be determined to be consistent with, and comply with the compatibility criteria of the applicable compatibility zone and airport land use compatibility plan.

**Chapter 19.149.030 – Airport Land Use Commission (ALUC).** This chapter identifies the purpose of the ALUC which is to conduct airport land use compatibility planning. ALUCs protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports.

**Chapter 19.150 – Base Zones Permitted Land Uses.** This section establishes land use regulations for all base zones listed in this article consistent with the stated intent and purpose of each zone.

**Chapter 19.150.020 – Permitted Land Uses.** This chapter identifies through sub-section 19.150.020.B that Airport Land Use Compatibility includes additional Airport Land Use Compatibility Plan requirements for discretionary actions proposed on property located within an Airport Compatibility Zone. When located within an Airport Land Use Compatibility Zone, greater land use restrictions for airport compatibility may apply per the applicable Airport Land Use Compatibility Plan. Specifically, the permitted land use table identifies multiple-family dwellings in the Mixed Use Village zone as a permitted use by the City, but it also identifies that the uses are also subject to the ALUCP criteria where use may be strictly prohibited.

**Chapter 19.640 – General Permit Provisions.** This chapter establishes the overall structure for the application, review, and action on discretionary permits and legislative actions. Further, it identifies and describes the permits regulated by the Zoning Code. It also identifies those minor activities, uses, and structures that are exempt from permit requirements. It further requires compliance with all applicable laws and regulations.

*City of Riverside Citywide Design Guidelines and Sign Guidelines*

The City of Riverside adopted *Citywide Design Guidelines and Sign Guidelines* in November 2007 which were later amended and approved in January 2019. The purpose of these guidelines are to reinforce the physical image of Riverside which the City's prosperity, well-being, and the value and contribution of agriculture, cultural diversity, industry and manufacturing, education, and architectural heritage of the city. The image of the City's residential neighborhoods and neighborhood shopping centers emphasizes a small-town character within an urban metropolis. The physical image of Riverside provides an aesthetic that attracts the City's work force, employers, residents, and visitors. The guidelines work to reinforce this physical image of Riverside and are intended to promote quality, well-designed development throughout Riverside that enhances existing neighborhoods, creates identity, and improves the overall quality of life within the City by promoting a desired level of future development within the City. (RCDG-B, p. I-1).

### 5.7.3 Comments Received in Response to the Initial Study/Notice of Preparation

No comments were received regarding land use and planning in response to the Initial Study/Notice of Preparation (IS/NOP).

### 5.7.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State CEQA Guidelines.

As identified in the Initial Study (Appendix A) prepared for this Project, and as outlined in Section 4.0 of this DEIR, implementation of the proposed Project will have a less than significant impact in the following area and this topic is not addressed in this DEIR:

- Physically divide an established community.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following area and this topic is addressed in this DEIR:

- Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

### 5.7.5 Project Design Features

Design features refer to ways in which the proposed Project will avoid or minimize potential impacts through the design of the Project. The proposed Project has been designed with sensitivity to the adjacent land uses and the existing residential neighborhoods by siting commercial uses along the frontage of Arlington Avenue and three story residential buildings along the Streeter Avenue frontage. Residential uses closest to adjacent single family residential neighborhoods to the north and east have been designed to be two story townhomes. Public open space areas for dining/gathering have been located where they can be easily accessed by the public.

### 5.7.6 Methodology

The following discussion analyzes the proposed Project’s consistency with applicable GP goals policies for the purposes of avoiding or mitigating an environmental effect.

### 5.7.7 Environmental Impacts

***Threshold: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

Section 15125(d) of the State *CEQA Guidelines* requires EIRs to “...discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.” The objective of such a discussion is to find ways to modify a proposed project, if warranted, to reduce any identified inconsistencies with relevant plans and policies. Pursuant to Section 15125(d), this Draft EIR includes an evaluation of the consistency of the proposed Project with pertinent goals and policies of relevant adopted local and regional plans.



The existing General Plan Land Use designations and Zoning designations for APN 226-180-015-1 are not consistent with the proposed use. Hence, a General Plan Amendment and Rezoning are required for consistency.

The Project includes a proposal to amend the existing General Plan Land Use designation of the project site currently designated General Plan Land Use Designation of C – Commercial and a zoning designation of CG – Commercial General as shown on **Figure 3.0-5, Existing General Plan Land Use Designation** and **Figure 3.0-6, Existing Zoning Designation** in Section 3.0 - Project Description of this Draft EIR, respectively. The Project proposes a General Plan Amendment (GPA) to amend the General Plan Land Use designation from (C) – Commercial to (MU-V) – Mixed Use-Village as shown on **Figure 3.0-7**, in Section 3.0 – Project Description of this Draft EIR. Once the GP Amendment is approved, the planned uses for the site would be fully consistent with the site’s General Plan (MU-V) land use designation.

The Project also includes a proposal to rezone (RZ) the Project site from (CG) – Commercial General to (MU-V) Mixed Use-Village as shown on **Figure 3.0-9** in Section 3.0 – Project Description of this Draft EIR. Development of the Project site is regulated by the development regulations and design standards contained within the City’s Zoning Ordinance. The City of Riverside’s Zoning Ordinance is contained as Chapter 19 of the City of Riverside Municipal Code. The proposed Project would be subject to the City of Riverside Municipal Code Chapter 19.120 – Mixed Use Zones and Chapter 19.640 – General Permit Provisions.

The primary purpose of the Mixed Use Zone is to provide development opportunities for integrated, complementary residential and commercial development on the same parcel or a contiguous group of parcels. Singular, stand-alone uses are permitted when they foster an overall mixture of uses in the zone. A wide range of uses is permitted, and it is the intent of these zones to foster a mixture of product types. Development solely as commercial or residential districts is strongly discouraged. Design and development standards for all three zones are directed toward encouraging pedestrian activity and ensuring that mixed commercial and residential uses are designed to be compatible both within the development and with other surrounding areas. The primary purpose of the General Permit Provisions is to establish the overall structure for the application, review, and action on discretionary permits and legislative actions. Further, it identifies and describes the permits regulated by the Zoning Code. It also identifies those minor activities, uses, and structures that are exempt from permit requirements. It further requires compliance with all applicable laws and regulations.

The proposed General Plan Amendment and Rezone will bring the Project site’s land use and zoning designations consistent with the proposed uses. City MC Chapter 19.100.040 identifies that total gross acreage be utilized to determine residential density. With respect to the MU-V zone, maximum allowable density is 30 dwelling units per acre (du/ac). As identified in MC Chapter 19.120.050, development standards are applicable to all development within the mixed-use zone. As such, all parcels proposed as MU-V as part of this Project are coupled to the same development standards meaning the entire gross acreage of 17.43 gross acres is utilized to calculate residential density. In accordance with City MC, the Project would result in an overall site density of 22.3 du/ac. However, in order to provide the most conservative density calculation, the net acreage of proposed residential parcel alone, was utilized to calculate maximum site density for this Project. As a result, the Project would result in a maximum residential density of 26.9 dwelling units per acre (du/ac).<sup>1</sup> This density is consistent with the MU-V designation as it is still less than the maximum density of 30 du/ac. As such, the proposed Project

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1.  $388 \text{ Dwelling Units} \div 14.44 \text{ Residential Acres} = 26.9 \text{ du/ac}$

would be fully consistent with the Riverside General Plan objectives and policies identified in Section 5.7.2 except for the following; Objective LU-22, Policy LU-22.2, Policy LU -22.3, Policy LU-22.5 and Policy LU-22.7 due to the Project's proximity to the Riverside Municipal Airport. The Project site is located within Zones B1, C, and D of the RMA LUCP. As discussed in Section 5.6 – Hazards and Hazardous Materials of this Draft EIR, the Project was determined to be inconsistent with this plan. Since the Project is located within the RMA LUCP airport zones and the Project is inconsistent with the land use and density designations outlined in each of the applicable zones of the RMA LUCP, the Project would be inconsistent with the five identified Riverside General Plan objectives and policies. The Southern California Association of Governments (SCAG) regional council adopted Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) a detailed discussion of the Project's consistency with applicable SCAG's Connect SoCal policies can be found in Table 6.0-B in Section 6.0 – Consistency with Regional Plans.

Thus, because the proposed Project was found inconsistent with the RMA LUCP by the Riverside County Airport Land Use Commission, it will conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts are **significant and unavoidable**.

### 5.7.8 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures **MM HAZ-3** and **MM NOI-1** outlined in Section 5.6 – Hazards and Hazardous Materials and Section 5.8 – Noise, respectively, shall be implemented to reduce impacts related to reduce potentially significant impacts related to airport noise hazards. However there are no mitigation measures that can lessen impacts to land use and planning as a result of the inconsistency determination with the RCALUCP. Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented.

Implementation of local, state, and federal regulations, and project design considerations listed above, provide consistency with General Plan land use and zoning, GP policies and the MC. However, the proposed Project is inconsistent with the RCALUCP as discussed in Section 5.6 – Hazards and Hazardous Materials of this Draft EIR. Therefore, impacts will be **significant and unavoidable** and a statement of overriding considerations will be required prior to Project approval.

## 5.8 Noise

The focus of this section is to analyze potential impacts related to noise. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics of this Draft EIR.

The analysis in this section is based on the *Exterior Noise Analysis Report Arlington Mixed-Use*, prepared by dBF Associates, dated October 28, 2023 (dBF). This report is herein referred to as the Noise Analysis and is contained in its entirety in Appendix E of this Draft EIR.

### 5.8.1 Setting

The area surrounding the Project site is currently dominated by residential, commercial, and office uses. The Project site is located within the boundaries of the Riverside Municipal Airport Land Use Compatibility Plan (RMA LUCP). Noise sources in the Project area consist of vehicular traffic along Arlington Avenue, Streeter Avenue, and aircraft operations associated with RMA.

#### Characteristics of Sound

This section presents a discussion of noise fundamentals applicable to the Project, together with an assessment of existing ambient noise levels and noise sources in the Project vicinity. Sound is a pressure wave created by a moving or vibrating source that travels through an elastic medium such as air. Noise is most often defined as unwanted sound. The City of Riverside is subject to typical urban noises, such as noise generated by traffic, heavy machinery, and day-to-day outdoor activities (GP 2025 FEIR, p. 5.11-2).

Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, perceived importance of the noise and its appropriateness in the setting, time of day and type of activity during which the noise occurs, and sensitivity of the individual. (dBF, p. 3).

#### Noise Fundamentals

Although sound can be easily measured, the perceptibility is subjective and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this to human frequency-dependent response, the A-weighting filter system is used to adjust measured sound levels and is expressed as dBA. Noise levels using A-weighted measurements are written dB(A) or dBA. **Table 5.8-A, Typical Noise Levels of Common Sounds** below, shows the relationship of various noise levels to common noise events. (GP 2025 FEIR, p. 5.11-2).

**Table 5.8-A, Typical Noise Levels of Common Sounds**

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	rock band
jet fly-over at 1,000 feet	105	
	100	
gas lawnmower at 3 feet	95	
	90	
	85	food blender at 3 feet
diesel truck, 50 mph at 50 feet	80	garbage disposal at 3 feet
noisy urban area during daytime	75	
gas lawnmower at 100 feet	70	vacuum cleaner at 10 feet
commercial area	65	normal speech at 3 feet
heavy traffic at 300 feet	60	
	55	large business office
quiet urban area during daytime	50	dishwasher in next room
	45	
quiet urban area during nighttime	40	theater, large conference room (background)
quiet suburban area during nighttime	35	
	30	library
quiet rural area during nighttime	25	bedroom at night, concert hall (background)
	20	
	15	broadcast/recording studio
	10	
	5	
lowest threshold of human hearing	0	lowest threshold of human hearing

Source: CT-A, Table 2-5; GP 2025 EIR, Table 5.11-A

From the noise source to the receiver, noise changes both in level and frequency spectrum. The most obvious is the decrease in noise as the distance from the source increases. The manner in which noise reduces with distance depends on whether the source is a point or line source as well as ground absorption, atmospheric effects, and refraction, and shielding by natural and manmade features. Sound from small, localized sources radiates uniformly outward as it travels away from the source in a spherical pattern. The noise drop-off rate associated with this geometric spreading is 6 dBA per each doubling of the distance (dBA/DD). (CT-A, pp. 2-27-2.28).

Transportation noise sources such as roadways are typically analyzed as line sources, since at any given moment the receiver may be impacted by noise from multiple vehicles at various locations along the roadway. Because of the geometry of a line source, the noise drop-off rate associated with the geometric spreading of a line source is 3 dBA/DD. (CT-A, pp. 2-27-2.28; FTA, p. 69).

Decibels are measured on a logarithmic scale, which quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as a doubled traffic volume, would increase the noise levels by 3 dBA; halving of the energy would result in a 3 dBA decrease. (CT-A, pp. 2-15, 6-5).



It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA; that a change of 5 dBA is readily perceptible, and that an increase (decrease) of 10 dBA sounds twice (half) as loud. (CT-B, pp. 3-2, 3-8, 7-1).

#### *Noise Descriptors*

Because community noise (environmental, residential, or domestic sources) fluctuates over time, a single measure called the Equivalent Sound Level (Leq) is often used to describe the time-varying character of community noise. (CT-A, p. 2-48).

The Leq is the energy-averaged A-weighted sound level during a measured time interval and is equal to the level of a continuous steady sound containing the same total acoustical energy over the averaging time period as the actual time-varying sound. Additionally, it is often desirable to know the acoustic range of the noise source being measured. This is accomplished through the Lmax and Lmin indicators, which represent the root-mean-square maximum and minimum noise levels obtained during the measurement interval. The Lmin value obtained for a particular monitoring location is often called the “acoustic floor” for that location. (dBF, p. 5).

To describe the time-varying character of environmental noise, the statistical noise descriptors L10, L50, and L90 are commonly used. They are the noise levels equaled or exceeded during 10, 50, and 90 percent of a stated time, respectively. Sound levels associated with L10 typically describe transient or short-term events, whereas levels associated with L90 describe the steady-state (or most prevalent) noise conditions. (dBF, p. 5).

Noise standards for land use compatibility are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (Ldn). CNEL is a 24-hour weighted average measure of community noise. CNEL is obtained by adding five decibels to sound levels in the evening (7:00 PM to 10:00 PM), and by adding ten decibels to sound levels at night (10:00 PM to 7:00 AM). This weighting accounts for the increased human sensitivity to noise during the evening and nighttime hours. Ldn is a similar 24-hour average measure that weighs only the nighttime hours. (dBF, p. 5).

The Day-Night Average Sound Level (Ldn or DNL) is also an adjusted average A-weighted sound level for a 24-hour day, similar to CNEL. It is calculated by adding a 10-dB adjustment to sound levels during nighttime hours (10:00 p.m. to 7:00 a.m.); there is no adjustment applied to evening hours. DNL is considered to be equivalent to CNEL. This descriptor is used by the City of Riverside to evaluate land-use compatibility with regard to noise. (dBF, p. 5).

## **Vibration**

Groundborne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration may be comprised of a single pulse, a series of pulses, or a continuous oscillatory motion. The ground motion caused by vibration is measured in vibration decibels (VdB). The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. The general human response to different levels of groundborne vibration velocity levels is described in **Table 5.8-B, Human Response Levels to Groundborne Vibration** below. (GP 2025 EIR, p. 5.11-4).

**Table 5.8-B, Human Response Levels to Groundborne Vibration**

Vibration Velocity	Human Behavior
65 VdB	Approximate threshold of perception for many people
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day

Source: GP 2025 EIR, Table 5.11-B

Most perceptible indoor vibration is caused by sources within buildings such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If roadways are smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, which is general threshold where minor damage can occur in fragile buildings. **Table 5.8-C, Typical Levels of Groundborne Vibration** below, depicts the typical vibration levels and its sources. (GP 2025 EIR, p. 5.11-4).

**Table 5.8-C, Typical Levels of Groundborne Vibration**

Human/Structural Response	Velocity Level (VdB)	Typical Sources (50 ft from source)
Threshold, minor cosmetic damage fragile buildings	100	Blasting from construction projects Bulldozers and other heavy tracked construction equipment
Difficulty with tasks such as reading a VDT screen	90	Commuter train, upper range
Residential annoyance, infrequent events (ex: commuter rail)	80	Rapid transit, upper range
Residential annoyance, infrequent events (ex: rapid transit)	70	Commuter rail, typical Bus or truck over bump Rapid transit, typical
Approx. threshold for human perception	60	Bus or truck, typical
	50	Typical background vibration

Source: GP 2025 EIR, Table 5.11-C

The frequency of a vibrating object describes how rapidly it is oscillating, measured in Hz. Most environmental vibrations consist of a composite, or “spectrum” of many frequencies, and are classified as broadband or random vibrations. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz. Vibration data is expressed in terms of the peak particle velocity (PPV) in inches per second (in/sec). The PPV is the velocity of the soil particles resulting from a disturbance. **Table 5.8-D, Vibration Damage Potential**, below shows FTAs building damage threshold.

**Table 5.8-D, Vibration Damage Potential**

Building Category	PPV (in/sec)
Reinforced-concrete, steel, or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Non-engineered timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

Source: FTA, Table 7-5

**Existing Site and Surrounding Conditions**

As the Project site lies within an existing urban setting, an American National Standards Institute (ANSI Section SI4 1979, Type 2) RION Model NL-31 sound level meter was used to document existing ambient noise levels. To do so, three (3) daytime noise measurements were taken on September 28, 2022, that were approximately 10 minutes in length. As shown on **Figure 5.8-1, Ambient Noise Measurement Locations** below, noise measurements were taken along the Project site’s northeast, west, and southeast property lines. The closest sensitive receptors to the Project site are the residential properties along the eastern and northern boundary, adjacent to the Project site, as well as the residential properties west of the Project site along Streeter Avenue. (dBF, pp. 7. 11).

**Table 5.8-E, Existing (Ambient) Noise Levels** below, provides a summary of the short-term ambient noise data. Ambient noise levels ranged between 51.5 and 69.0 dBA Leq at the three locations monitored. The primary existing noise source was from vehicles traveling along adjacent roadways and the secondary noise source was from aircraft operations associated with the Riverside Municipal Airport. (dBF, p. 9).

**Table 5.8-E, Existing Noise Levels (dBA)**

Site Location <sup>1</sup>	Time	dBA Leq	Lmin	Lmax	L(10)	L(50)	L(90)
ML1	12:20 p.m. – 12:30 p.m.	68.5	52.2	79.6	72.4	65.8	57.9
ML2	12:35 p.m. – 12:45 p.m.	69.0	45.4	78.8	72.6	67.3	55.8
ML3	12:55 p.m. – 1:15 p.m.	51.5	41.2	72.9	53.1	67.3	44.2

Source: dBF, Table 2

**Notes:**  
1. Location per Figure 5.9-A

H:\2022\22-0172\GIS\PRO\traffic\_transportation\traffic\_transportation.aprx Map created 28 Jul 2023



Source: Noise Analysis Report, dBF Associates Inc., March 16, 2023.

**Figure 5.8-1 Ambient Noise Measurement Locations**

NTS

Arlington Mixed Use



#### *Vehicle Traffic*

The Project site is adjacent to Arlington Avenue, an east-west roadway, to the south and Streeter Avenue, a north-south roadway to the west of the Project site. Arlington Avenue carries an existing (2022) average daily traffic (ADT) volume of approximately 57,600 vehicles at California Avenue. Streeter Avenue carries an existing (2022) ADT volume of 37,450 vehicles at El Molino. The nearby posted speed limit is 40 miles per hour. (dBF, p. 9).

#### *Airport*

The Project site is located southeast approximately 0.63 miles from the Riverside Municipal Airport and is within the Riverside Municipal Airport Comprehensive Land Use Compatibility Plan (RMCLUP). The Project Site is located within the Riverside Municipal Airport Compatibility Zones B1, C, and D as reflected in **Figure 3.0-7** in Section 3.0 – Project Description of this Draft EIR. Most of the Project site lies within Zone B1 with smaller portions of the Project site located within Zones C and D. The RMCLUP identifies that the Project site is located within 55-60 CNEL noise contour. (RMA LUCP, Exhibit RI-7).

## **5.8.2 Related Regulations**

To limit the population's exposure to physically and/or psychologically damaging noise levels, the federal government, the State, various County governments, and most municipalities in California have established standards and ordinances to control noise.

### **Federal Regulations**

#### *Noise Control Act of 1972*

The United States Environmental Protection Agency's (EPA's) Office of Noise Abatement and Control was established to coordinate federal noise control activities (EPA 2018). The Noise Control Act of 1972 establishes a national policy to promote an environment for all Americans free from noise that jeopardizes their health and welfare. The Act also serves to (1) establish a means for effective coordination of Federal research and activities in noise control; (2) authorize the establishment of Federal noise emission standards for products distributed in commerce; and (3) provide information to the public respecting the noise emission and noise reduction characteristics of such products. (EPA 2017).

In 1981, EPA administrators determined that subjective issues such as noise would be better addressed at lower levels of government. Consequently, in 1982 responsibilities for regulating noise control policies were transferred to State and local governments. However, noise control guidelines and regulations contained in EPA rulings in prior years remain in place by designated Federal agencies, allowing more individualized control for specific issues by designated Federal, State, and local government agencies. (EPA 2018).

#### *Federal Transit Administration and Federal Railroad Administration Standards*

Although the Federal Transit Administration (FTA) standards are intended for federally-funded mass transit projects, the impact assessment procedures and criteria included in the *FTA Transit Noise and Vibration Impact Assessment Manual*, September 2018, are routinely used for projects proposed by local jurisdictions. The FTA and Federal Railroad Administration (FRA) have published guidelines for assessing the impacts of ground-borne vibration associated with rail projects, which have been applied by other jurisdictions to non-rail projects. The FTA measure of the threshold of architectural damage for conventional sensitive structures is 0.2 inch per second peak particle velocity (PPV).

*Occupational Safety and Health Administration (OSHA)*

The federal government regulates occupational noise exposure common in the workplace through the Occupational Safety and Health Administration (OSHA). Noise regulations apply to the operation of construction equipment and may apply to industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and will not be addressed further in this analysis. (OSHA).

**State Regulations**

*State of California General Plan Guidelines 2003*

Through not adopted by law, the State of California General Plan Guidelines 2003 and updated in 2017, published by the California Governor's Office of Planning and Research Guidelines (OPR Guidelines), provide guidance for the compatibility of projects within areas of specific noise exposure. The OPR Guidelines identify the suitability of several types of construction relative to a range of outdoor noise levels and provide each local community some flexibility in setting local noise standards that allow for the variability in community preferences. The OPR Guidelines include a Noise and Land Use Compatibility Matrix that identifies acceptable and unacceptable community noise exposure limits for various land use categories. The City of Riverside has utilized the State's noise/land use compatibility matrix as a model to create their own. (OPR 2017, pp. 131-140, 374).

**Figure 5.8-2, Land Use/Noise Compatibility Guidelines** depicts the land use compatibility chart for community noise prepared by the State of California, Department of Health, as adopted by the City of Riverside. It identifies normally acceptable, conditionally acceptable, and clearly unacceptable noise levels for siting various new land uses. A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and the needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements.

California Code of Regulations, Part 2, Title 24, Appendix Chapter 35, Section 3501 establishes the State Noise Insulation Standards, which limit the interior noise level exposure within new hotels, motels, dormitories, long-term care facilities, apartment houses and dwellings. This State standard indicates that interior noise levels attributable to exterior noise sources shall not exceed 45 dB (CNEL or L<sub>dn</sub>) in any habitable room.

Business and Professions Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353 address buyer notification requirements for lands around airports and are available on-line at <http://www.leginfo.ca.gov/calaw.html>. Any person who intends to offer subdivided lands, common interest developments and residential properties for sale or lease within an airport influence area is required to disclose that fact to the person buying the property.

## Noise/ Land Use Noise Compatibility Criteria

Land Use Category	Community Noise Equivalent Level (CNEL) or Day-Night Level (Ldn), dB						
	55	60	65	70	75	80	85
Single Family Residential*							
Infill Single Family Residential*							
Commercial- Motels, Hotels, Transient Lodging							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Amphitheaters, Concert Hall, Auditorium, Meeting Hall							
Sports Arenas, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Rec., Cemeteries							
Office Buildings, Business, Commercial, Professional							
Industrial, Manufacturing Utilities, Agriculture							
Freeway Adjacent Commercial, Office, and Industrial Uses.							

**Nature of the noise environment where the CNEL or Ldn level is:**

**Below 55 dB**  
Relatively quiet suburban or urban areas, no arterial streets within 1 block, no freeways within 1/4 mile.

**55-65 dB**  
Most somewhat noisy urban areas, near but not directly adjacent to high volumes of traffic.

**65-75 dB**  
Very noisy urban areas near arterials, freeways or airports.

**75+ dB**  
Extremely noisy urban areas adjacent to freeways or under airport traffic patterns. Hearing damage with constant exposure outdoors.

<p> <b>Normally Acceptable</b></p> <p>Specific land use is satisfactory, based on the assumption that any building is of normal conventional construction, without any special noise insulation requirements.</p>	<p> <b>Conditionally Acceptable</b></p> <p>New construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.</p>	<p> <b>Normally Unacceptable</b></p> <p>New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in design.</p>	<p> <b>Conditionally Unacceptable</b></p> <p>New construction or development should generally not be undertaken, unless it can be demonstrated that noise reduction requirements can be employed to reduce noise impacts to an acceptable level. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.</p>
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The Community Noise Equivalent Level (CNEL) and Day-Night Noise Level (Ldn) are measures of the 24-hour noise environment. They represent the constant A-weighted noise level that would be measured if all the sound energy received over the day were averaged. In order to account for the greater sensitivity of people to noise at night, the CNEL weighting includes a 5-decibel penalty on noise between 7:00 p.m. and 10:00 p.m. and a 10-decibel penalty on noise between 10:00 p.m. and 7:00 a.m. of the next day. The Ldn includes only the 10-decibel weighting for late-night noise events. For practical purposes, the two measures are equivalent for typical urban noise environments.

\* For properties located within airport influence areas, acceptable noise limits for single family residential uses are established by the Riverside County Airport Land Use Compatibility Plan.

SOURCE: STATE DEPARTMENT OF HEALTH,  
AS MODIFIED BY THE CITY OF RIVERSIDE

H:\2022\22-0172\GIS\PRO\traffic\_transportation\traffic\_transportation.aprx Map created 28 Jul 2023

Source: City of Riverside General Plan and Supporting Documents EIR, Nov, 2007.

### Figure 5.8-2 Land Use/Noise Compatibility Guidelines

Arlington Mixed Use

*Green Building Standards Code*

The California Green Building Standards Code (“Green Code”) limits noise within non-residential buildings. Relevant portions include the following:

- 5.507.4.2 Performance method. For buildings located as defined in Section 5.507.4.1 or 5.507.4.1.1 (exposed to a noise level of 65 dB Leq-1-hr during any hour of operation), wall and roof-ceiling assemblies exposed to the noise source making up the building or addition envelope or altered envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise level (Leq-1Hr) of 50 dBA in occupied areas during any hour of operation.

**Regional Regulations**

*Riverside Municipal Airport Land Use Compatibility Plan*

The Riverside County Airport Land Use Commission (ALUC) is the lead agency responsible for airport land use compatibility planning in Riverside County. The fundamental purpose of ALUC is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. The basic function of the airport land use compatibility plans is to promote compatibility between airports and the land uses that surround them. Land Use Compatibility Plans (LUCP) serve as a tool for use by airport land use commissions in fulfilling their duty to review proposed development plans for airports and surrounding land uses. Additionally, compatibility plans set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances and to landowners in their design of new development. In March 2005, ALUC adopted the Riverside County Airport Land Use Compatibility Plan (RCALUCP). The compatibility zones and associated criteria set forth in the RMA LUCP provide noise and safety compatibility protection. The Project site is located within Land Use Compatibility Zones B1, C, and D which restrict maximum residential density and non-residential intensity. As such, the Project has been reviewed by ALUC to determine compatibility with the RCALUCP. The ALUC determined via a public hearing January 12, 2023, that the Project is inconsistent with the RCALUCP.

**Local Regulations**

*City of Riverside 2025 General Plan*

The City of Riverside General plan contains policies and implementation tools that are considered applicable to the proposed Project, as identified below (GP 2025, pp. 5.11-17 – 5.11-20):

**Noise Element**

In compliance with California Government Code Section 65302, the GP 2025 Noise Element identifies noise and land use compatibility criteria that identifies “Normally Acceptable,” “Conditionally Acceptable,” “Normally Unacceptable,” and “Conditionally Unacceptable” noise exposure ranges for various land uses as shown on Figure 5.8-2, Land Use/Noise Compatibility Guidelines (Figure N-10 of the GP 2025).

These standards are primarily used for planning purposes such as determining a project’s compatibility with a proposed site with regard to existing and future acoustical impacts upon a project site sourced from the surrounding environment. In other words, the noise impacts from existing surrounding land uses to a proposed project.



The “Normally Acceptable” range is defined as: specific land use is satisfactory, based on the assumption that any building is of normal conventional construction, without any special noise insulation requirements.

The “Conditionally Acceptable” range is defined as: new construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

The “Normally Unacceptable” range is defined as: new construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and include needed noise insulation features in design.

The “Conditionally Unacceptable” range is defined as: new construction or development should generally not be undertaken, unless it can be demonstrated that noise reduction requirements can be employed to reduce noise impacts to an acceptable level. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and include needed noise insulation features in the design.

### **Noise Element Policies**

- |              |  |
|--------------|--|
| Policy N-1.1 | Continue to enforce noise abatement and control measures particularly within residential neighborhoods.  |
| Policy N-1.2 | Require the inclusion of noise-reducing design features in development consistent with standards in Figure N-10 – Noise/Land Use Compatibility Criteria (see <b>Figure 5.8-2</b> of this Draft EIR above), Title 24 California Code of Regulations and Title 7 of the Municipal Code.  |
| Policy N-1.3 | Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.   |
| Policy N-1.4 | Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.  |
| Policy N-2.1 | Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards in Figure N-10 – Noise/Land Use Compatibility Criteria (see <b>Figure 5.8-2</b> of this Draft EIR above) and the airport noise contour maps (found in the Riverside County Airport Land Use Compatibility Plans) as guides to future planning and development decisions. |
| Policy N-2.2 | Avoid placing noise-sensitive land uses (e.g., residential uses, hospitals, assisted living facilities, group homes, schools, day care centers, etc.) within the high noise impact areas (over 60 dB CNEL) for Riverside Municipal Airport and Flabob Airport in accordance with the Riverside County airport Land Use Compatibility Plan.   |

- Policy N-2.5 Utilize the Airport Protection Overlay Zone, as appropriate, to advise landowners of special noise considerations associated with their development.
- Policy N-3.2 Work with the Riverside County Airport Land Use Commission and the March Joint Powers Authority to develop noise/land use guidelines and City land use plans that are consistent with ALUC policies.
- Policy N-4.1 Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (e.g., earthen berms, landscaped walls, lowered streets, improved technology).

#### **Noise Element Implementation Tools**

- Tool N-1: Review development proposals to ensure that the noise standards and compatibility set forth in the Noise Element are met to the maximum extent practicable. Require acoustical analyses for all proposed development within the 60 dB CNEL contour as shown in the Noise Element and for all proposed residential projects within the vicinity of existing and proposed commercial and industrial areas. Require mitigation, where necessary, to reduce noise levels to meet standards and construction methods.
- Tool N-2: Implement CEQA during the development review process for new projects. Assess future development projects' potential for noise and ground-borne vibration impacts related to noise land use compatibility, construction-related noise, on-site stationary noise sources, and vehicular-related noise.
- Tool N-3: Continue to enforce City noise regulations to protect residents from excessive noise levels associated with nuisance and stationary noise sources (Title 7 of the City of Riverside Municipal Code). Periodically evaluate regulations for adequacy and revise, as needed, to address community needs and changes in legislation and technology.
- Tool N-4: Ensure proposed development meets Title 24 Noise Insulation Standards for construction.

#### **Circulation and Community Mobility Element Policies**

- Policy CCM-2.9 Design all street improvement projects in a comprehensive fashion to include consideration of street trees, pedestrian walkways, bicycle lanes, equestrian pathways, signing, lighting, noise, and air quality wherever any of these factors are applicable.
- Policy LU-22.3 Work to limit the encroachment of uses that potentially pose a threat to continued airport operations, including intensification of residential and/or commercial facilities within identified airport safety zones and areas already impacted by current or projected airport noise.
- Policy LU-22.4 Adopt and utilize an Airport Protection Overlay Zone and the Riverside County airport Land Use Compatibility Plan as it affects lands within the City of Riverside.

Policy LU-22.5 Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted on Figure PS-6 – Airport Safety Zones and Influence Areas (in the General Plan) for consistency with all applicable airport land use compatibility plan policies adopted by the Riverside County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible.

*City of Riverside 2025 General Plan EIR*

The following mitigation measures from the Riverside 2025 General Plan EIR are applicable pertain to Noise.

**MM NOISE 1:** To minimize impacts resulting from or to proposed projects such that noise levels exceed General Plan Noise Element standards, projects shall be reviewed against the noise compatibility matrix in the Noise Element of the General Plan (Table 5.11-D, herein) and Figures 5.11-6, 5.11-7, 5.11-8, 5.11-9, and 5.11-10 of this EIR to determine suitability of the use in relation to adjacent land uses and noise sources such as roadways, freeways, and airports. To the extent required by the compatibility matrix or one of the figures, a noise study shall be required to evaluate noise levels against standards and to recommend suitable mitigation consistent with Title 24 regulations and the City’s Noise Code. Mitigation may include but not be limited to: walls, berms, interior noise insulation, double paned windows, or other noise mitigation measures as appropriate, in the design of new residential or other noise sensitive land uses. (GP 2025 FEIR, p. 5.11-42)

The preparation of the Noise Analysis satisfied mitigation measure **MM NOISE 1**.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.

*City of Riverside Phase I General Plan Update EIR*

There are no applicable mitigation measures from the GPU EIR that pertain to Noise.

*City of Riverside Municipal Code*

The following sections of the City’s Municipal Code are applicable and pertain to Noise:

**Chapter 16.08.175 Exterior Noise Insulation Standards.** This section establishes uniform minimum noise insulation performance standards to protect persons within new hotels, motels, apartment houses, and all other dwellings including detached single-family dwellings from the effects of excessive exterior noise, including but not limited to, hearing loss or impairment and persistent interference with speech and sleep. This section also requires submittal of an acoustical analysis with the building permit application.

- **Interior Levels.** Interior day-night average sound levels (Ldn) with windows closed, attributable to exterior sources shall not exceed an Ldn of 45 decibels (dBA) in any habitable room.
- **Airport noise source.** Residential structures to be located within an Ldn contour of 60 dBA or higher require an acoustical analysis showing that the structure has been designed to limit intruding noise to the allowable interior noise levels prescribed in this subsection. The Ldn contour shall be determined in accordance with Ldn noise levels anticipated by the Riverside general plan or by more current Ldn contour maps developed for governmental agencies and deemed acceptable by the Planning Director.

- **Vehicular and industrial noise sources.** Residential buildings or structures to be located within Ldn contours of 60 dBA or higher from the select system of County roads and City streets (as specified in Section 186.4 of the State Streets and Highways Code), freeways, State highways, railroads, rapid transit lines and industrial noise sources shall require an acoustical analysis showing that the proposed building has been designed to limit intruding noise to the allowable interior noise levels prescribed in this subsection. The Ldn contour shall be determined in accordance with Ldn noise levels anticipated by the Riverside General Plan or by more current Ldn contour maps developed for governmental agencies and deemed acceptable by the Planning Director. Exception: Railroads, where there are no nighttime (10:00 p.m. to 7:00 a.m.) railway operations and where daytime (7:00 a.m. to 10:00 p.m.) railway operations do not exceed four per day.
- **Compliance.** Evidence of compliance with this chapter of the municipal code shall consist of submittal of an acoustical analysis report, prepared under the supervision of a person experienced in the field of acoustical engineering, with the application for building permit. The report shall show topographical relationship of noise sources and dwelling site, identification of noise sources and their characteristics, predicted noise spectra at the exterior of the proposed dwelling structure considering present and future land usage, basis for the prediction (measured or obtained from published data), noise attenuation measures to be applied, and an analysis of the noise insulation effectiveness of the proposed construction showing that the prescribed interior noise level requirements are met. If interior allowable noise levels are met by requiring that windows be inoperable or closed, the design for the structure must also specify the means that will be employed to provide ventilation, and cooling if necessary, to provide a habitable interior environment.

**Chapter 7.25.010 Exterior Sound Level Limits.** This section specifies standards for exterior sound level limits. Per RMC 7.25.010 it is unlawful to for any person to cause or allow the creation of any noise that exceeds the levels set forth in **Table 5.8-F, Exterior Noise Standards**. This table summarizes the exterior noise standards by land use. If the measured ambient noise level exceeds that permissible within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five decibel increments in each category as appropriate to encompass the ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.

**Table 5.8-F, Exterior Noise Standards**

Land Use	Time Period	Noise Level
Residential	Nighttime <sup>1</sup>	45 dBA
	Daytime <sup>1</sup>	55 dBA
Office/Commercial	Anytime	65 dBA
Industrial	Anytime	70 dBA
Community Support	Anytime	60 dBA
Public Recreation Facility	Anytime	65 dBA
Non-Urban	Anytime	70 dBA



Source: MC, Table 7.25.010 B  
Notes:  
1. Nighttime hours 10 p.m. to 7 a.m.; Daytime hours 7 a.m. to 10p.m

Based on the ambient noise measurements collected as part of the Noise Analysis, noise levels at the southern and western property lines of the Project site (shown on **Figure 5.9-A** as ML1 and ML2, respectively) currently exceed the exterior noise standards reported in **Table 5.8-F**, above. As indicated in **Table 5.8-E, Existing Noise Levels** (dBA Leq), the existing ambient noise levels at ML1 and ML2 are 68.5 and 69.0 Leq, respectively. **Chapter 7.30.015 Interior Noise Level Limits**. This section specifies standards for operational noise sources. **Table 5.8-H, Interior Noise Standards** below summarizes the interior noise standards by land use at when measured inside the dwelling unit, school, or hospital.

**Table 5.8-G, Interior Noise Standards**

Land Use	Time Period	Noise Level
Residential	Nighttime <sup>1</sup>	35 dBA
	Daytime <sup>1</sup>	45 dBA
School	Daytime <sup>1</sup> while school is in session	45 dBA
Hospitals	Anytime	45 dBA
Source: MC, Table 7.30.015 Notes: 1. Nighttime hours 10 p.m. to 7 a.m.; Daytime hours 7 a.m. to 10p.m		

**Chapter 7.35.020 – Exemptions.** This chapter, specifically subsection (G) Construction identifies those uses exempt from noise ordinance. Noise sources associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City as required; and provided said activities do not take place 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.

### 5.8.3 Comments Received in Response to the Initial Study/Notice of Preparation

No comments were received regarding noise in response to the Initial Study/Notice of Preparation (IS/NOP).

### 5.8.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State CEQA Guidelines.

As identified in the Initial Study (Appendix A), prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- 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;
- Generation of excessive groundborne vibration or groundborne noise levels; and
- For a project located within the vicinity of a private airstrip of an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

### 5.8.5 Project Design Features

The Project includes design features that includes a 6-foot cinder block wall (also referred to as Concrete masonry unit wall [CMU wall]) screen walls along the perimeter of the adjacent resident uses to screen and block noise and vibration, provide a buffer between the existing residential development to the east and the north of the Project site to mitigate noise impacts to adjacent uses. Specifically, the residential portion of the Project site will be surrounded by a 6 foot high tubular steel fence, 6 foot high block wall, or combination block wall/steel fence as reflected in **Figure 3.0-27** in Section 3.0 – Project Description of this Draft EIR.

### 5.8.6 Methodology

The Noise Analysis reviewed the proposed Project’s construction noise and operational noise (offsite traffic noise and onsite operational noise). The purpose of the Noise Analysis is to provide an assessment of the noise impacts resulting from development of the proposed Project and to identify mitigation measures that may be necessary to reduce those impacts in the context of the California Environmental Quality Act (CEQA). There are two types of noise impacts applicable to any project; noise impacts to a project and noise impacts from a project. Noise from the proposed Project is generated during the construction and operational phases. Noise impacts to the Project may be from non-Project sources, such as airport operations, railroads, and traffic as well as from Project-generated noise.

#### Construction Noise

The magnitude of the noise impact during construction is a function of the type of construction activity, equipment, duration of the construction activity, distance between the construction noise source and receptor, and intervening structures. Noise levels associated with construction activities of the Project were estimated based on information from the Project developer for construction equipment requirements and schedule. It was assumed that construction of the Project will take 23 months to complete and that construction would be built in two phases with the first phase being commercial parcel and the second phase being the residential parcel. Construction is anticipated to commence July 2024. A grading plan and construction phasing plan has not been finalized at the time of this analysis; therefore, only a general estimate of construction noise levels can be provided.

The proposed Project would include the demolition of the existing vacant former Sears buildings (Sears Department Store building, Sears Auto Center building, and all appurtenances). Demolition would include removal of both structures, parking lot, existing onsite utility lines, and existing vegetation including trees. A protective fence with windscreen material would be installed around the Project site

during demolition to obscure views. Project construction would utilize crushed materials from the site as engineered fill material. Based on the **Table 5.2, Estimated Construction Schedule** in Section 5.2 – Air Quality of this Draft EIR, demolitions will take place over approximately 20 days. No blasting is anticipated as part of the Project. However, heavy machinery such as, but not limited, to crushing/processing equipment, concrete/industrial saws, excavators, rubber tired dozers, and other small- to medium-sized construction equipment may be utilized.

The Project would implement conventional construction techniques and equipment. The sound levels of standard equipment would range from 65 dBA to 95 dBA at 50 feet from the source (i.e., the piece of equipment). Worst case construction noise levels are associated with grading activities. Grading would require the use of heavy equipment such as bulldozers, backhoes, water trucks, and rollers. No blasting would be required. Noise sources associated with grading of the proposed Project, and associated noise levels, are shown in **Table 5.8-H, Grading Noise Source Levels**, below. (dBF, p 16).

**Table 5.8-H, Grading Noise Source Levels**

Noise Source	Noise Level	Number
Bulldozer	80 dBA at 10 meters	1
Backhoe	69 dBA at 10 meters	1
Water Truck	81 dBA at 10 meters	1
Roller	73 dBA at 10 meters	1

Source: dBF, Table 3

The Datakustik Cadna/A industrial noise prediction model was used to estimate worst-case noise from construction activity. It was assumed that up to four pieces of equipment at any given time would operate continuously within the grading boundary. No correction was made for downtime associated with equipment maintenance, breaks, or similar situations. And no noise reduction related to ground effects, atmospheric absorption, or intervening topography was taken into account in the model. (DBF, p 16).

**Operational Noise**

Sources of Project-related operational noise are mechanical equipment and Project-generated traffic. The following basic parameters were used in the modeling assumptions. The Project applicant proposes development of approximately 576,203 sf of residential and commercial-retail uses. The residential component of the proposed Project includes development of 27 residential buildings. The commercial component of the proposed Project includes development of 25,320 sf of commercial-retail use by way of two commercial-retail buildings totaling 5,000 sf in the southeastern portion of the site along Arlington Avenue. The Project also includes a 5,000 sf multi-tenant retail speculative pad with an adjoining outdoor dining/flex space and a 20,320 sf grocery store.

As described in the Noise Analysis, the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) version 2.5 was used to estimate traffic noise levels. The modeling calculations take into account the peak-hour traffic volumes, average estimated vehicle speed, and the estimated vehicle mix (percentage of cars, medium trucks, heavy trucks, buses, and motorcycles). The peak-hour traffic noise

was considered equivalent to the interior day-night average sound levels (Ldn) / Community Noise Equivalent Level (CNEL). (dBF, p. 12).

The model assumed pavement propagation conditions which corresponds to a drop-off rate of approximately 3 dBA per doubling distance. Noise attenuation effects such as changes in elevation, topography, and intervening structures were not included in the model to represent a worst-case representation of the roadway nose. (dBF, p. 12).

The Project would result in an operational-related noise impact if Project-generated noise levels conflict with the noise standards set forth in RMC Chapters 7.25.010 and 7.35.010, which are shown in **Table 5.8-F, Exterior Noise Standards** and **Table 5.8-G, Interior Noise Standards**.

#### *Mechanical Equipment*

One rooftop HVAC unit is proposed to be positioned over each of the residential units while three units are proposed on top the clubhouse/fitness/ leasing building. Each HVAC unit was assumed to be a 3-ton HVAC that would produce a sound power level of approximately 77 dBA. Rooftop HVAC units were treated as stationary point sources and assumed to be constantly operational. It is anticipated that there would be four 12.5-ton HVAC units on the commercial (grocery) structure, and two 10-ton units on the other retail building proposed by the Project. The units on the commercial spaces are expected to produce a sound power level of 88-90 dBA. These units would be at least 50 feet from the nearest residential property line and would be shielded with solid parapets at least as tall as the units. Further, they would not be in operation during nighttime hours of 10:00 pm to 7:00 am. The Datakustik Cadna/A industrial noise prediction model was used to estimate operational noise levels from noise sources on the Project site. (dBF, p. 15).

#### *Project Generated Traffic Noise*

As described in the Noise Assessment, the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) version 2.5 was used to estimate traffic noise levels. The modeling calculations consider the peak-hour traffic volumes, average estimated vehicle speed, and the estimated vehicle mix (percentage of cars, medium trucks, heavy trucks, buses, and motorcycles). (dBF, pp. 12). Project generated traffic would result in a noise related impact if traffic noise levels would result in an increase of 3 dBA at nearby roadways.

#### **Vibration**

The potential ground-borne vibration levels resulting from construction activities occurring from the proposed Project were estimated by data published by the Federal Transit Administration (FTA). Thus, the groundborne vibration levels generated by these sources have also been quantitatively estimated and compared to the applicable thresholds of significance listed below.

There are no City or state vibration standards applicable to the proposed Project. As such, available guidelines from the FTA are utilized to assess impacts due to ground-borne vibration. The FTA has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. As shown in **Table 5.8-D** above, the threshold at which there is a risk to “architectural” damage to residential structures (non-engineered timber and masonry buildings) is a PPV of 0.2. The FTA has also adopted standards associated with human annoyance for groundborne vibration. As shown on **Table 5.8-B** above the FTA has identified that 75 VdB is the threshold for annoyance from groundborne vibration at sensitive receptors. As such, impacts would be significant if



construction activities result in groundborne vibration of 0.2 PPV or higher at residential structures or 75 VdB.

### **Noise Impacts to the Project**

According to the *City of Riverside 2025 General Plan Final Environmental Impact Report* (the GP 2025 FEIR), the City relies on the noise compatibility matrix in the GP 2025 Noise Element identified in **Figure 5.8-2**, above to determine if a future development project will be subject to significant noise impacts, whether self-created or from the existing environment. Therefore, a significant noise impact to the proposed Project may occur if noise at the Project site produced by surrounding sources, including Project-generated traffic, will exceed:

- 75 Ldn / CNEL at the residential portion of the Project Site. This noise level was selected because it is the highest “Conditionally Acceptable” noise level for Infill Single Family Residential land uses.<sup>1</sup>
- 75 Ldn / CNEL at the commercial portion of the Project Site. This noise level was selected because it is the highest “Conditionally Acceptable” noise level for Office Buildings, Business, Commercial, Professional land uses.

## **5.8.7 Environmental Impacts**

***Threshold: Would the Project 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 for this threshold are Project-related noise impacts are evaluated from the perspective of noise impacts to the Project and noise impacts from the Project.

### **Temporary Noise Levels**

#### *Construction*

Construction noise is considered temporary because once construction is completed this noise source ceases. On-site construction and demolition of the structures at the Project site will result in the generation of new temporary noise from the transport of workers, the movement of construction materials to and from the Project site, demolition of the existing structures, excavation, grading, and building activities. The closest sensitive receptors to the Project site, i.e., existing residences, are located to the north and east of the Project site. As indicated in Section 5.1 – Aesthetic Resources of this Draft EIR, habitable structures located within the existing residential neighborhoods east of the Project site are generally setback 37 to 79 feet from the Project site’s property line. Habitable structures located within the existing residential neighborhoods north of the Project site are generally setback 24 to 43 feet from the Project site’s property line. One exception is a structure at the northeastern most corner of the Project site’s property line which is only 8 feet from the property line which is actually non-compliant with its R-1-7000 zoning, which requires a 25 foot minimum setback. The Project would implement conventional construction techniques and equipment. Standard equipment such as scrapers, graders, backhoes, loaders, tractors, cranes, and miscellaneous trucks would be used for construction. Sound levels of typical construction equipment range from 65 dBA to 95 dBA at 50 feet from the source. Worst-case construction noise levels are associated with grading activities. As stated in Section 5.8.6 above, no noise reduction measures were utilized in the noise modeling in order to produce a

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1. The City’s Land Use/Noise Compatibility Guidelines does not have a land use category for mixed use projects; therefore, the Infill Single Family Residential land use was used for the residential component of the Project.

worst-case construction noise outcome. Construction equipment constantly moves around the site so the average noise level at a point on the property line is lower than the levels identified in Table 5.8-H, above. As such, construction equipment will be farther than 10 meters from any residence most of the time so the noise level would be lower. Without the inclusion of any noise abatement during construction, grading activities would produce noise levels ranging up to 73 dBA Leq at the property lines of the residences. RMC 7.35.020(G) indicates that construction between 7:00 a.m. and 7:00 p.m. on weekdays or between 8:00 a.m. and 5:00 p.m. on Saturday is exempt from noise limits. Construction activities and the delivery of construction materials and equipment would occur within these hours (dBF, p. 16). As such, temporary noise impacts as a result of Project site construction would be **less than significant**.

Off-site construction activities within the right-of-way (ROW) are exempt from the City's General Noise Regulations outlined in RMC chapter 7.35. RMC 7.35.020 (E) states construction within City ROW is exempt from the provisions of RMC Chapter 7.35 when, in the opinion of the Public Works Director or designee, such work will create traffic congestion and/or hazardous or unsafe conditions. As such, temporary noise impacts as a result of Project-related construction within the City's ROW would be **less than significant**.

#### *Construction Conclusion*

Through PDF's and compliance with RMC Section 7.35, Project-related construction noise levels would not exceed the City's acceptable noise levels so temporary noise related impacts would be **less than significant**.

#### **Permanent Noise Levels**

##### *Operation (Noise From the Project)*

The mechanical equipment on the residential buildings (i.e., the HVAC units) would generate noise levels up to approximately 35 dBA Leq at the Project's property lines. The mechanical equipment on the commercial buildings would produce noise levels up to approximately 50 dBA at the Project's northern and eastern property lines. Since the noise levels would be lower than the allowable levels of 55 dBA during the daytime hours and 45 dBA during nighttime hours (because the mechanical equipment on the commercial structures would not be operating) set forth in RMC 7.25.010, impacts would be **less than significant**. (dBF, p. 15).

##### *Project Traffic*

As discussed in *Section 5.8.1 – Setting* above, Project-generated trips, which includes both residential and commercial uses from the proposed Project, would need to result in a doubling of the traffic volumes on a road segment in order to result in an audible increase in ambient noise levels. The Project would add peak-hour volume of up to 1,700 vehicles to the existing 29,250 vehicles on Arlington Avenue and add peak-hour volume of up to 1,500 vehicles to the existing volume of 18,650 vehicles on Streeter Avenue. These increases in traffic would result in increases of less than 1 dBA CNEL. As the increases in traffic noise would be less than 3 dBA, it would be not perceptible to the average person. (dBF, p. 16). As such, roadway noise levels during operations would be **less than significant**.

##### *Operation*

The existing and future noise environment may have impacts on the proposed residential land uses. As such, an analysis to determine impacts to these uses was conducted. The existing and future noise environment would continue to be a result of vehicular traffic on Arlington Avenue and Streeter Avenue

as well as the aircraft activity associated with Riverside Municipal Airport, which may result in potentially significant exterior noise impacts to the Project site.

Arlington Avenue at California Avenue is projected to carry a future (Horizon Year 2045 with Project) average daily trip (ADT) volume of 75,900 vehicles and it was assumed the existing speed limit of 40 mph and traffic mix of 2 percent medium trucks, 0.5 percent heavy trucks, 0.5 percent buses, and 1 percent motorcycles, would remain constant in the future. Streeter Avenue at El Molino Avenue is projected to carry a future ADT volume of 50,050 vehicles and assumed the existing speed limit of 40 mph and traffic mix of 3 percent medium trucks would also remain constant in the future. Since no noise projections for the Riverside Municipal Airport were available, it was assumed that the current noise levels of 55-62 dBA CNEL would not increase in the future. (dBF, pp. 12-13).

Based on these assumptions, the Project's exterior composite (roadway plus airport) noise levels at the proposed residential buildings are projected to range from below 60 dBA Ldn / CNEL at the northeast façades to approximately 70 dBA Ldn / CNEL at the west façades as shown on **Figure 5.8-3, Future Exterior Composite Noise Levels**. (dBF, pp. 12-13). Because exterior noise levels in the residential portion of the Project site would exceed 60 dBA, based on standard construction providing 15 dBA noise reduction, the interior noise levels in Project's proposed habitable rooms may exceed the RMC Section 16.08.175 and CBC Section 1206.4 maximum residential noise limit of 45 dBA Ldn / CNEL in habitable rooms. However, through compliance with RMC Section 16.08.175 B 5, which requires preparation of an acoustical analysis report with the application for building permit and implementation of mitigation measure **MM NOI-1** which would require noise attenuation measures to ensure interior noise levels do not exceed these requirements, impacts would be **less than significant with mitigation incorporated**.

The residential component of the proposed Project includes the following outdoor use areas: pool, pedestrian, promenade, and dog park. Future exterior composite noise levels in these areas would be 65 dBA Ldn / CNEL or less at all of these areas, which would be considered Normally Acceptable for Infill Single Family Residential land uses. (dbf, p. 13). Because the future composite noise level is considered Normally Acceptable, **impacts would be less than significant** and no mitigation is required.

Future exterior composite noise levels at the proposed commercial buildings would range from approximately 61 dBA Ldn / CNEL at the north façades, which is considered Normally Acceptable for Office Buildings, Business, Commercial, Professional land uses to approximately 72 dBA Ldn / CNEL at the south retail façade, which is considered Conditionally Acceptable for Office Buildings, Business, Commercial, Professional land uses. According to **Figure 5.8-3**, The "Conditionally Acceptable" range is defined as: new construction or development should be undertaken only after a detailed analysis of noise reduction requirements is made and needed noise insulation features included in design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice. The Project will implement mitigation measure **MM NOI-2**, which requires preparation of a detailed acoustic analysis report and incorporation of noise attenuation measures. Thus, impacts would be **less than significant with mitigation incorporated**.

The Project's commercial component includes an outdoor dining / flex space area on the west side of the retail pad. Future exterior composite noise level at this space would be approximately 68 dBA Ldn / CNEL and would be considered "Conditionally Acceptable." (dbf, p. 13.) With implementation of mitigation measure **MM NOI-2**, impacts to the outdoor dining / flex space would be **less than significant with mitigation incorporated**.







*Operation Conclusion*

Through compliance with RMC Section 16.08.175 and implementation of mitigation measure MM NOI-1, Project-related operational noise levels would not exceed the City’s acceptable noise levels so operational noise related impacts would be **less than significant with mitigation incorporated**.

*Conclusion*

Thus, with through compliance with the RMC and implementation of mitigation measures **MM NOI-1** and **MM NOI-2**, the Project would not result in 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. Therefore, impacts would be **less than significant with incorporation of mitigation**.

**Threshold: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?**

**Construction**

This construction vibration impact analysis discusses the level of human annoyance using vibration levels in vibration velocity decibels (VdB) and assesses the potential for building damage using vibration levels in peak particle velocity (PPV) (inches per second [in/sec]). Federal Transit Administration typical vibration levels associated with construction equipment are presented in **Table 5.8-I, FTA Vibration Source Levels for Construction Equipment** below.

**Table 5.8-I, FTA Vibration Source Levels for Construction Equipment**

Equipment	Reference PPV/Lv at 25 feet	
	PPV (in/sec)	Lv (VdB)
Pile Driver (impact), Typical	0.644	104
Pile Driver (sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson drilling	0.089	87
Loaded Truck	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58
Source: Caltrans, Table 7-4		

The greatest vibration levels are anticipated to occur during the grading phase of the Project. All other phases are expected to result in lower vibration levels. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the Project boundary (assuming the construction equipment would be used at or near the Project boundary) because vibration impacts normally occur within the buildings.

To determine potential construction vibration damage annoyance the following formula was used  $PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$ . Where  $PPV_{ref}$  is the reference equipment and  $D$  is the distance from the equipment to the receiver in feet. The Project's grading activities would include one large bulldozer. The large bulldozer could be operated as close as 10 meters (32 feet) from the adjacent residential buildings located to the north and east of the Project site. At 32 feet, the large bulldozer would generate approximately 0.07 in/sec peak particle velocity (PPV). As reflected in **Table 5.8-D** above, the threshold at which there is a risk to "architectural" damage to residential structures (non-engineered timber and masonry buildings) is a PPV of 0.2 (in/sec). Because the large bulldozer would generate vibration below FTA's threshold, then the potential for vibration building damage potential is low.

To determine potential construction vibration annoyance the following formula was used.  $L_{vdB}(D) = L_{VdB}(25\text{ ft}) - 30 \log(D/25)$ . Where  $L_{VdB}(25\text{ ft})$  is the reference equipment and  $D$  is the distance from the equipment to the receiver in feet. The large bulldozer could be operated as close as 32 feet and would generate approximately 84 vdB. As shown on **Table 5.8-B** above, the FTA has identified that 75 VdB is the threshold for annoyance from groundborne vibration at sensitive receptors. Although the large bulldozer would exceed FTAs threshold for vibration annoyance of 75 VdB, these impacts would be temporary since Project construction is expected to occur for 23 months. As such, temporary vibration impacts associated with construction would be **less than significant**.

### Operational

Once operational, the proposed Project would not generate vibration. In addition, vibration levels generated from Project-related traffic on the adjacent roadways (i.e., Arlington Avenue and Streeter Avenue) would be unusual for on-road vehicles because the rubber tires and suspension systems of on road vehicles provide vibration isolation.

Per Caltrans' *Transportation Noise and Vibration Manual*, vehicular traffic on roadways rarely generates vibration amplitudes high enough to cause structural or cosmetic damage. (CT-B, Appendix A, p.14). Caltrans collected vibration data for truck pass-bys, as a result it was concluded that vibration from trucks were higher than that of an automobile. However, vibration from these trucks drops off dramatically with distance. Vibration wavefronts emanating from several trucks closely together may either cancel or partially cancel (destructive interference) or reinforce or partially reinforce (constructive interference) each other, depending on their phases and frequencies. Since traffic vibrations can be considered random, total destructive or constructive interference probabilities are minimal. (CT-B, Appendix A, p.13).

Caltrans found that at 5 meters (m) from the centerline of the nearest lane vibrations never exceeded 2.0 mm/s (0.08 in/sec), even with worst combinations of heavy trucks. This amplitude coincides with the maximum recommended "safe amplitude" for historic buildings. Caltrans determined that for most people at 45 m from the center line vibration, amplitudes would dip below most human perception thresholds. According to Caltrans, sensitive receptors adjacent to local roadways within 15 m of the nearest travel lane's center line will have the maximum worst-case vibration levels of 0.08 mm/s or (0.0032 in/sec or 70 VdB). (CT-B, Appendix A, p.14.)

As previously mentioned, FTA's damage criteria is 0.2 PPV (in/sec) and the human annoyance level is 75 VdB. This worst-case vibration level from truck traffic would not exceed FTAs thresholds. Furthermore, it is expected that actual vibration levels within the Project area from truck traffic would be lower than this worst-case level when soil type and pavement conditions are considered so vibration from project-

related traffic on the adjacent roadways would not be significant. As such, vibration impacts associated with operations would be **less than significant**.

### **Conclusion**

Thus, the Project would not result in generation of excessive groundborne vibration or groundborne noise levels during project construction or operation. Therefore, impacts would be **less than significant**.

***Threshold: For a project located within the vicinity of a private airstrip of an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?***

The proposed Project was required to be reviewed by the Airport Land Use Commission (ALUC) for its consistency with the RCALUCP. As discussed in detail in Section 5.6 – Hazards and Hazardous Materials, on January 12, 2023, ALUC determined via a public hearing, that the proposed Project is inconsistent with the RCALUCP. However, the Project was determined to be inconsistent with the residential density and non-residential site intensity requirements, not due to airport noise. Noise from airport operations would be considered a noise impact to the Project; thus, the appropriate threshold for this noise source is the Land Use/Noise Compatibility Criteria shown on **Figure 5.8-2**.

Based on the Noise Analysis, the Project site is located approximately one mile from the RMA runway and is exposed to RMA noise levels of 55 dBA CNEL to 62 dBA CNEL. (dBF, p 9).. As shown on **Figure 5.8-2, Land Use/Noise Compatibility Guidelines**, this CNEL level is considered Normally Acceptable for Infill Single Family Residential land uses and Normally Acceptable for Office Buildings, Business, Commercial, Professional land uses.

Most of the Project site is located within Land Use Compatibility Zone B1 (with smaller portions located within Zones C and D). The residential component of the Project proposes 382 units in Compatibility Zone B1, 1 unit in Zone C, and 5 units in Zone D. Zone B1 is identified as the Inner Approach/Departure Zone of the Riverside Municipal Airport. Zone B1 is considered a "High Noise Impact" area since it lies mostly within the 60 Community Noise Equivalent Level (CNEL) contour. Because of this, single-event noise may be sufficient enough to disrupt a wide range of land use activities, including indoor uses if windows are open. (ALUC-A, pp. 5-6). However, as presented above, the Project's Noise Analysis indicated that the actual noise levels from RMA operations are in the 55 dBA CNEL to 62 dBA CNEL range, which is considered "Normally Acceptable" for Infill Single Family Residential Uses and as such does not exceed the City's standards for exterior noise.

Since the RCALUCP considers Zone B1 as a "High Noise Impact" area, the Project proposes a number of outdoor recreational areas that could expose users to a moderate level of interference from aircraft noise including promenades, pool, and dog park. While the overall land use in this area is designated as a residential use, the proposed open space areas are recreational in nature. As shown on **Figure 5.8-2**, the "Normally Acceptable" range for the Playgrounds, Neighborhood Parks<sup>2</sup> land use category is 50 dBA Ldn / CNEL to 70 dBA Ldn / CNEL.

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<sup>2</sup> The Playgrounds, Neighborhood Parks land use category was selected because it is the best fit for the proposed promenade, pool, and dog park.

As outlined in the Project's Noise Analysis, noise from airport operations combined with the ambient and future traffic noise, will combine to result in future exterior composite noise levels of 65 dBA Ldn / CNEL or less, for the exterior/outdoor areas of the Project's residential component, which is considered "Normally Acceptable;" and approximately 68 dBA Ldn / CNEL at the proposed outdoor dining / flex space area, which is considered "Conditionally Acceptable." (dbf, p. 13).

Since the airplane noise by itself will not exceed the City's Land Use/Noise Compatibility Criteria or RMA's outdoor noise limit of 65 dBA, the Project's location within the RCALUCP Noise Contour of the B1 Zone, is not anticipated to expose residents and patrons to excessive aircraft noise alone. However, when combined with existing and future traffic noise, the exterior noise levels for residents will exceed the 65 dBA standard at the west residential façades (70 dBA), south retail façade (72 dBA), and the outdoor dining/flex space area on the west side of the retail pad (68 dBA). (dbf, p. 13.) However, as shown in Table 5.8-E, Existing Noise Levels (dBA), existing ambient noise levels already exceed noise levels from aircraft and the 65 dBA threshold for exterior noise identified by RMA policy 2.1.

For indoor noise levels which are 45 dBA CNEL, the expected airplane noise ranging from 55 to 62 dBA CNEL will cause an exceedance indoors, if not mitigated. Although standard construction is normally considered to provide for a 15-decibel reduction from exterior noise levels, which could by itself reduce the expected interior noise levels inside from airplane noise levels to be 40 to 47dBA CNEL. Compliance with RMC 16.08.175 B 5 and implementation of mitigation measure **MM NOI-1**, which requires an acoustical noise analysis to be conducted to identify of the required noise attenuation measures and incorporation of said measures into the design of the residential uses to ensure interior noise levels from aircraft operations and other noise sources are at or below 45 CNEL. Regarding the commercial component, the Project will implement mitigation measure **MM NOI-2**, which requires preparation of a detailed acoustic analysis report and incorporation of noise attenuation measures. Thus, impacts would be **less than significant with mitigation incorporated**.

Thus, through compliance with the municipal code and implementation of mitigation measure **MM NOI-1** and **MM NOI-2**, the Project would not expose people residing or working in the project area to excessive noise from airport operations. Therefore, impacts would be **less than significant with mitigation incorporated**.

### 5.8.8 Recommended Mitigation Measures

An Environmental Impact Report is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines* § 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts related to Noise.

There are no mitigation measures required to reduce impacts related to an increase in temporary or permanent construction noise levels or impacts related to excessive groundborne vibration or groundborne noise levels since less than significant impacts are anticipated from implementation of the Project. Exterior noise levels were found to be less than significant. The following mitigation measures shall be implemented to eliminate or reduce potentially significant impacts related to traffic noise to the new residential units:

**MM NOI-1 Residential Interior and Exterior Noise.** Prior to issuance of a building permit for any residential building or unit, an acoustical analysis shall be conducted by a noise specialist meeting the requirements set forth in Riverside Municipal Code 16.08-175 B 5



to confirm that the noise insulation proposed in the final design is sufficient to achieve interior noise levels at or below 45 CNEL and exterior noise levels at or below 65 CNEL. Interior noise attenuation measures identified in said acoustical analysis shall be incorporated into the design of the residences, to the extent such measures are necessary, to ensure that interior noise levels are at or below 45 CNEL. Measures may include, but not be limited to, upgraded building façade elements (windows, doors, and /or exterior wall assemblies) with Sound Transmission Class (STC) rating of 35 or higher. If the interior limit can be achieved only with the windows closed, then the building design shall include mechanical ventilation that meets California Building Code requirements. Exterior noise attenuation measures, which shall be unit/structure specific, may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 CNEL.

**MM NOI-2 Commercial Exterior Noise.** Prior to issuance of a building permit for any commercial structure, an acoustical analysis shall be conducted by a noise specialist meeting the requirements set forth in Riverside Municipal Code section 16.08-175 B 5 to confirm that the noise insulation proposed in the final design is sufficient to achieve exterior noise levels at or below 65 CNEL in any outdoor dining / flex space. Noise attenuation measures identified in said acoustical analysis shall be incorporated into the design of the commercial area, to the extent such measures are necessary, to ensure that exterior noise levels are at or below 65 CNEL. Exterior noise attenuation measures, which shall be specific to the ultimate location of the outdoor dining / flex space may include site design and building layout and/or noise barriers sufficient to achieve exterior noise levels at or below 65 CNEL.

### **5.8.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

Implementation of local, state, and federal regulations, project design features, and General Plan policies listed above, and project-specific mitigation measures **MM NOI-1** and **MM NOI-2** will reduce the Project's habitable rooms interior noise levels at or below 45 dBA Ldn / CNEL, the residential exterior areas at or below 65 dBA Ldn / CNEL, and commercial outdoor dining / flex space at or below 65 DBA Ldn / CNEL. Implementation of these mitigation measures will not result in residual environmental impacts.

## 5.9 Population and Housing

The focus of this section is to analyze potential impacts related to Population and Housing. The following discussion addresses the potential for adverse impacts that could result from the construction and operations as a result of the Project. Cumulative impacts related to this topic are discussed in Section 7.0 – Other CEQA Topics.

Changes in population, employment, and housing demand are social and economic effects, not environmental effects. According to Section 15382 of the CEQA Guidelines, “An economic or social change by itself shall not be considered a significant effect on the environment.” However, these effects should be considered in an EIR only to the extent that they create adverse impacts on the physical environment, such as increased traffic and associated air quality and noise impacts, and increased demands on public services and utilities. These effects are described in Section 5.2 – Air Quality, Section 5.8 – Noise, Section 5.10 – Public Services, and Section 5.13 – Utilities and Service Systems, of this DEIR.

### 5.9.1 Setting

The Project entails, an approximately 17.43 gross acre site located at the northeast corner of Arlington Avenue and Streeter The Project site currently houses an existing but vacant Sears Department Store building and associated Auto Center and respective surface parking lot. According to the latest Department of Finance (DOF) data, the City’s estimated population is currently 313,676 people (DOF).

### Regional and Local Data Forecasts

Population, housing, and employment data for the City and surrounding area are available from the DOF and the Southern California Association of Governments (SCAG) Regional Growth Forecasts. SCAG is the regional planning agency with responsibility for reviewing the consistency of local plans, projects, and programs with regional plans. It is a federally-designated metropolitan planning organization (MPO) for six Southern California counties, including Riverside County. As such, SCAG is mandated to create regional plans that address among other things, growth management.

### Population

Population forecasts for the City and surrounding area are provided by SCAG. The 2020-2045 SCAG Regional Transportation Plan/Sustainable Communities Strategy Growth Forecast, also known as Connect SoCal (RTP/SCS), was adopted September 3, 2020 by SCAG’s Regional Council. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals so that the region can grow smartly and sustainably. SCAG updates the growth forecast every four years and is broken down into separate growth forecasts for individual counties and cities. **Table 5.9-A, SCAG Growth Forecasts (Riverside County)**, shows SCAG’s population forecasts for Riverside County as a whole.

**Table 5.9-A, SCAG Growth Forecasts (Riverside County)**

	2018	2020	2035	2040	2045
Population	2,364,000	2,493,000	2,853,000	2,996,000	3,252,000
Households	716,000	785,000	930,000	988,000	1,086,000
Employment	743,000	823,000	961,000	1,009,000	1,103,000
Jobs-to-Housing Ratio <sup>1</sup>	1.04:1	1.05:1	1.03:1	1.02:1	1.02:1
Source: SCAG, Table 13					
<b>Notes:</b>					
1. Total number of jobs relative to the total number of households - calculated					

**Table 5.9-B, SCAG Growth Forecasts (Riverside)**, depicts the SCAG population forecasts for the City of Riverside.

**Table 5.9-B, SCAG Growth Forecast (Riverside)**

	2016	2045
Population	325,300	395,800
Households	94,500	115,100
Employment	145,400	188,700
Jobs-to-Housing Ratio <sup>1</sup>	1.54:1	1.70:1
Source: SCAG, Table 14		
<b>Notes:</b>		
1. Total number of jobs relative to the total number of households calculated.		
2. 2020, 2035, and 2040 data not available		

### Employment

According to SCAG’s most recent 2017 data, the City has approximately 148,352 jobs (SCAG 2019, p. 24). The five largest employment sectors represent 64.4 percent of the total jobs in the City. These sectors include Education (27.9 percent), Retail (11.4 percent), Professional (9.4 percent), Public (8.7 percent), and Leisure (8.1 percent). Education/Health jobs include organizations such as elementary and secondary schools, junior colleges, universities, professional schools, technical and trade schools, medical offices, dental offices, outpatient care centers, medical and diagnostic laboratories, hospitals, nursing and residential care facilities, social assistance services, emergency relief services, vocational rehabilitation services, and child day care services. Retail jobs include organizations engaged in the sale of durable goods directly to consumers. Professional/Management jobs include activities that specialize in professional/scientific/technical services, management of companies and enterprises and administrative and support services. Establishment types may include law offices, accounting services, architectural/engineering firms, specialized design services, computer system design and related services, management consulting firms, scientific research and development services, advertising firms, office administrative services and facilities support services. Public Administration jobs include public

sector organizations, such as legislative bodies, public finance institutions, executive and legislative offices, courts, police protection, parole offices, fire protection, correctional institutions, administration of governmental programs, space research and technology and nation security. Leisure jobs include activities involved in the performing arts, spectator sports, museums, amusement/recreation, travel accommodations, and food and drink services (SCAG 2019, pp. 38-39).

## Housing

In March 2021, SCAG adopted the Regional Housing Needs Assessment (RHNA) 6<sup>th</sup> Cycle for the planning period of October 2021 through October 2029. The RHNA identified new housing units needed by income category for the region, including the City of Riverside. The City has been allocated to provide 18,458 new housing units as shown in **Table 5.9-C, City of Riverside RHNA 2021-2029** below (RHNA). However, as part of the City Phase I General Plan Update (GPUI) which includes the 6<sup>th</sup> Cycle Housing Element for the planning period of 2021-2029, adopted in October 2021, the City added a self-prescribed buffer of new dwelling units to provide during this planning period to ensure the City meets the minimum recommended by State Department of Housing and Community Development to account for the “No Net Loss” requirements as mandated by Senate Bill 166 (SB 166). The City elected to provide an approximately 30 percent “No Net Loss” buffer and so will target providing 24,000 new homes. (GPUI, p. 3.9-12). The vacancy rate in the City has been steadily decreasing each year since 2010 and currently sits at 4.0 percent (DOF).

**Table 5.9-C, City of Riverside RHNA 2021-2029**

Household Income Category	Target (units)
Very Low	4,861
Low	3,064
Moderate	3,139
Above Moderate	7,394
<i>Subtotal</i>	<i>18,458</i>
<i>No Net Loss Buffer (30%)</i>	<i>5,500</i>
<b>Total<sup>1</sup></b>	<b>24,000</b>
Source: GPUI, p. 3.9-12	
Notes:	
1. No net loss units is approximate. Per GPUI, city will identify space for up to 24,000 new homes during the 2021-2029 RHNA cycle.	

## Jobs to Housing Ratio

The job-to-housing ratio is used as an indicator of a community’s jobs-rich or jobs-poor status. SCAG’s April 2001 report titled, *The New Economy and Jobs/Housing Balance in Southern California*, states that “a balance between jobs and housing in a metropolitan region can be defined as a provision of an adequate supply of housing to house workers employed in a defined area (i.e., community or subregion) (SCAG 2001, p.15). Alternatively, a jobs-to-housing balance can be defined as an adequate provision of



employment in a defined area that generates enough local workers to fill the housing supply.” Generally, a ratio of less than 1 to 1 indicates a jobs-poor area, and a ratio of more than 1 to 1 indicates a jobs-rich area. (SCAG 2001, p.15) The City of Riverside has a current unemployment rate of 3.5 percent (EDD).

As shown in **Table 5.9-A**, above, the RTP/SCS growth forecast indicates that in the year 2018 the jobs-to-housing ratio for Riverside County was 1.04:1, which by definition is considered jobs-rich. Riverside County is projected to continue to have a jobs-rich area through the year 2045. The City’s growth forecast indicates that in the year 2016 the jobs-to-housing ratio was 1.54:1 and is anticipated to increase to 1.70:1 by the year 2045. So, the City’s forecast remains jobs-rich as shown in **Table 5.9-B**, above.

## 5.9.2 Related Regulations

### Federal Regulations

No federal regulations are applicable to population and housing with respect to the proposed Project.

### State Regulations

State law mandates local communities plan for enough housing to meet projected growth in California. Article 10.6 of the California Government Code (Sections 655801–65590) requires each city and county to prepare a Housing Element as part of its General Plan. The Housing Element is one of seven state-mandated elements that every general plan must contain. The State requires it to be updated every five years and determined to be legally adequate. The purpose of the Housing Element is to identify the community’s housing needs, state the community’s goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs, and define the policies and programs that the community will implement to achieve the stated goals and objectives. The Housing Element identifies and establishes policies with respect to meeting the needs of existing and future residents. It also establishes policies that will guide decision makers and sets forth an action plan to implement its housing goals.

The California Department of Housing and Community Development (HCD) determines a Regional Housing Needs Allocation (RHNA) by income category for each Council of Governments (COG) throughout the state. The Southern California Association of Governments (SCAG) is the COG for Riverside County. The RHNA is based on California Department of Finance population projections and regional population forecasts used in preparing regional transportation plans.

Once HCD has determined the RHNA, SCAG is required to allocate to each locality, including the County, a share of the RHNA sufficient to meet the projected housing demand for each income category. The County and other localities must update their General Plan Housing Element to accommodate the applicable RHNA share by income category. The City updated the Housing Element for the “sixth cycle” covering the 2021-2029 period adopted in September 2021.

#### *Senate Bill 2 - Building Homes and Jobs Act*

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the State’s housing shortage and high housing costs. The package included the Building Homes and Jobs Act (SB 2), which established a funding source to increase the supply of affordable homes in California by collecting a \$75 recording fee on real estate documents. These funds were made available to all local governments in California to help prepare, adopt, and implement plans that streamline housing approvals and accelerate housing production. (SB2)

*Senate Bill 166 - No Net Loss Act*

In 2017 Senate Bill 166 (SB 166) was signed into law as a requirement for local government to ensure that its housing element inventory can accommodate its share of the regional housing need throughout the planning period. It prohibits them from reducing, requiring, or permitting the reduction of the residential density to a lower residential density than what was used by the California Department of Housing and Community Development for certification of the housing element, unless the city or county makes written findings supported by substantial evidence that the reduction is consistent with the adopted general plan, including the housing element. In such cases, any remaining sites identified in the housing element update must be adequate to accommodate the jurisdiction's share of the regional housing need. A local government may reduce the residential density for a parcel only if it identifies sufficient sites remaining within the housing element as replacement sites, so that there is no net loss of residential unit capacity (GPUI DEIR, pp.3-9).

*Senate Bill 375 – California's Sustainable Communities and Climate Protection Act*

Senate Bill 375 (SB 375) aligns land use and transportation planning to link development with transit-accessible places and reduce car dependency. SB 375 is the land use component of California's wider strategy to reduce greenhouse gas emissions, codified by the 2006 Global Warming Solutions Act through Assembly Bill 32 (AB 32). AB 32 enabled the state to regulate emission sources and set the aggressive goal of reducing emissions to 1990 levels by 2020. SB 375 requires California Metropolitan Planning Organizations (MPOs) to create Sustainable Communities Strategies (SCS) as part of the federally mandated Regional Transportation Plan (RTP). SCSs lay out the locations and types of development needed to lower vehicle miles traveled and meet greenhouse gas emission reduction targets (GPUI DEIR, p. 3.9-9).

*Senate Bill 330 – California Housing Crisis Act of 2019*

In 2019 Senate Bill 330 (SB 330) was signed into law as a means to combat the state's growing housing crisis. It applies to all urbanized areas or urban clusters. The legislation's goal is to increase California's housing stock by 3.5 million new units by 2025. To streamline residential development, a new preliminary application process is established which includes basic information regarding a project such as: (GPUI DEIR, pp. 3.9-9 – 3.9-10).

- Site characteristics
- Project Plans
- Certain environmental concerns
- Facts related to any potential density bonus
- Certain coastal zone-specific concerns
- Number of units to be demolished
- Location of recorded public easements

*Assembly Bill 1397*

California's AB 1397 made a number of changes to housing element law by revising what could be included in a local government's inventory of land suitable for residential development. AB 1397 changed the definition of land suitable for residential development to increase the number of multi-family sites. Identified sites must be "available" and "suitable" for residential development and have a "realistic and demonstrated potential" for redevelopment during the planning period. In addition, AB 1397 requires housing element inventory sites to be 0.5 acre to 10 acres, have sufficient infrastructure, or be included in a program to provide such infrastructure, to support and be accessible for housing development. The

local government must specify the realistic unit count for each site and whether it can accommodate housing at various income levels. (GPU EIR, p. 3.9-10)

## **Regional Regulations**

### *Southern California Association of Governments*

Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial. The region encompasses a population exceeding 19 million persons in an area of more than 38,000 square miles. As the designated MPO, the federal government mandates that SCAG researches and prepares plans for transportation, growth management, hazardous waste management, and air quality. Additionally, SCAG provides informational resources to regionally significant plans, projects, and programs per CEQA to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.

### *Connect SoCal*

The SCAG regional council adopted the 2020 – 2045 RTP/SCS or Connect SoCal in September 2020. Connect SoCal seeks to improve mobility and promote a more sustainable growth pattern. The long-range vision plan builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The goals included in Connect SoCal are meant to provide guidance for considering projects within the context of regional goals and policies. (RTP/SCS)

Connect SoCal includes population, housing, and employment growth projections for 2045. These growth projections are used in SCAG's transportation modeling and shape SCAG's regional planning efforts, as outlined in Connect SoCal. Connect SoCal minimizes increases in regional traffic congestion by focusing growth, density, and land use intensity within existing urbanized area as the general land use growth pattern for the region while enhancing the existing transportation system and integrating land use into transportation planning. Connect SoCal recommends local governments accommodate future growth within existing urbanized areas to reduce VMT, congestion, and greenhouse gas emissions. (RTP/SCS)

### *SCAG Regional Housing Needs Assessment*

State law requires that jurisdictions provide their fair share of regional housing needs by conducting a Regional Housing Needs Assessment (RHNA) and adopt a general plan for future growth (California Government Code Section 65300). The California Department of Housing and Community Development (HCD) is mandated to determine state-wide housing needs by income category for each Council of Governments (COG) throughout the state. The housing need is determined based on four broad household income categories: very low (households making less than 50 percent of median family income), low (50 to 80 percent of median family income), moderate (80 to 120 percent of median family income), and above moderate (more than 120 percent of median family income). The intent of the future needs allocation by income groups is to relieve the undue concentration of very low and low-income households in a single jurisdiction and to help allocate resources in a fair and equitable manner. SCAG is the COG for Riverside County. SCAG determined that Riverside's projected RHNA share for the 6th Cycle Housing Element (2021 - 2029) is 18,458 housing units.

## Local Regulations

### *City of Riverside General Plan*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project, as identified below (2025 GP, pp. AQ-26 – AQ-28, LU-26):

### ***Air Quality Element***

- Objective AQ-1      Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve job-housing balance; reduce vehicle miles traveled and length of work trips; and improve the flow of traffic.
- Policy AQ-1.5      Encourage infill development projects within urbanized areas that include job centers and transportation nodes.
- Policy AQ-1.6      Provide mixed-use development that allows the integration of retail, office, institutional and residential uses for the purpose of reducing costs of infrastructure construction and maximizing the use of land.
- Policy AQ-1.7      Support planned residential developments and infill housing, which reduce vehicle trips.
- Policy AQ-1.23      Increase residential and commercial densities around rail and bus transit stations

### ***Land Use Element***

- Objective LU-8      Emphasize smart growth principles through all steps of the land development process.
- Policy LU-8.3      Allow for mixed-use development at varying intensities at selected areas as a means of revitalizing underutilized urban parcels.

### *City of Riverside 2025 General Plan EIR*

There are no applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to Population and Housing.

### *City of Riverside Phase I General Plan Update*

The City of Riverside Phase I General Plan Update contains objectives and policies that are considered applicable to the proposed Project, as identified below (GPUI, pp. HE20 - HE22, HE26; AP9, AP13, EJ3):

### ***Environmental Justice Element***

- Policy LU-EJ-1.0      Housing Location: ensure new housing developments adhere to local, state, and federal requirements to avoid disproportionate impacts on environmental justice communities.

### ***Housing Element***

- Policy HE-4      Thriving Neighborhoods. Facilitate and encourage a variety of new housing types, including both single-and multi-family and missing middle housing, and the necessary public amenities to support a sense of community that results in equitable and sustainable neighborhoods.



Program HE-4-6	Conceptual Development Review. The City of Riverside already uses a conceptual development review process to encourage high-quality development and site design in residential and mixed-use districts through collaborative pre-application consultations between developers and City staff. The City will continue to program to facilitate the development of large lots.
Policy HE-5	Regulations. Reduce and remove government barriers, where feasible and legally permissible, to reduce costs of housing production and facilitate both ownership and rental opportunities for all residents
Program HE-5-1	Adequate Housing Opportunities Sites for RHNA. The City has developed an extensive inventory of potential development sites to accommodate the City's share of the Regional Housing Needs Allocation (RHNA). While not all of these sites are currently zoned to allow for residential uses or for residential densities suitable for lower-income housing, the City has proactively initiated and effort to rezone these sites for higher-density residential and mixed-use development. The rezoning will be completed prior to the beginning of the 2021-2029 Housing Element cycle.
Program HE-5-2	<p>Zoning Code Amendments. The City's Zoning Code will implement many of the policies and programs in the Housing Element. Updates to the Zoning Code prepared concurrently with or planned to be implemented with this Housing Element include:</p> <ul style="list-style-type: none"> <li>▪ Urban design regulations;</li> <li>▪ Incentives for building the maximum number of homes allowed;</li> <li>▪ Inventory sites for lower-income development that contain existing residential units occupied by or deed-restricted for lower-income households will be subject to replacement requirements pursuant to AB 1297 as a condition of project approval, consistent with the requirements State density bonus laws;</li> <li>▪ Allowance for the use of pre-approved construction plans;</li> <li>▪ Modifications to required findings for Requests for Reasonable Accommodations;</li> <li>▪ Streamlined review and approval processes for residential development;</li> <li>▪ Objective Design Standards pursuant SB330; and</li> <li>▪ Written procedures for streamlined approval of qualifying affordable housing projects pursuant SB 35.</li> </ul>
Policy HE-EJ-7	Development Process. Facilitate a development process that promotes the design and rehabilitation of housing that is responsive to the needs and desires of the residents of environmental justice communities.
Program HE-EJ-7-3	Housing on Small and Infill Lots. The City has identified that housing on infill lots will increase housing opportunities in Riverside. A small lot and/or Infill Development Ordinance would then be prepared to facilitate streamlining of development on these lots. Revisions to the Zoning Code may include reduced minimum lot sizes, reduced setbacks, greater building heights, or less parking to eliminate the need for variances.

*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUI EIR that pertain to Population and Housing.

*City of Riverside Municipal Code*

The following section of the City's Municipal Code are applicable and pertain to population and housing:

**Title 19 – Zoning.** The purpose of the Zoning Code is to encourage, classify, designate, regulate, restrict and segregate the highest and best location and use of buildings, structures and land for agriculture, residence, commerce, trade, industry, water conservation or other purposes in appropriate places; to regulate and limit the height, number of stories and size of buildings and other structures hereafter erected or altered; to regulate and determine the size of yards and other open spaces; and, to regulate and limit the density of population and for such purpose to divide the City into zones of such number, shape and area as may be deemed best suited to carry out these regulations and provide for their enforcement.

### **5.9.3 Comments Received in Response to the Initial Study/Notice of Preparation**

No comments were received regarding Population and Housing in response to the Initial Study/Notice of Preparation (IS/NOP).

### **5.9.4 Thresholds of Significance**

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the Initial Study (Appendix A) prepared for this Project, and as outlined in Section 4.0 of this DEIR< implementation of the proposed Project will have a less than significant impact in the following area and this topic is not addressed in this DEIR:

- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impact in the following area and this topics is addressed in this DEIR:

- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

### **5.9.5 Project Design Features**

Because the Project is proposing the implementation of new residential buildings which will introduce population growth at the Project site, no Project Design Features are incorporated that would lessen impacts related to population and housing.

### 5.9.6 Methodology

In September 2021, the City adopted Phase I General Plan Update (GPU) which consisted of the 6th Cycle Housing Element (2021-2029). The GPU utilized data from SCAG which estimated a current 2020 population within the City of 328,155 people. SCAG projected population within the City to increase to approximately 395,800 people by 2045, representing 20.6 percent increase in people. (GPU DEIR, p. 3.9-17).

However, the GPU utilized the 2020 Department of Finance (DOF) population generation factor of 3.28 people per household (the City's average household size). The population generation factor is an average of both single and multi-family uses. The GPU projected that population would increase resulting in a total population of 431,685 persons by 2045; 35,885 more people than projected by SCAG. Ultimately, the GPU used a more conservative population projection over SCAG to determine population by buildout year 2045. With this more conservative projection, the GPU determined that no mitigation was available to reduce the resulting impact to a less than significant level and that the impacts would be significant and unavoidable.

The analysis below has utilized 2023 Department of Finance (DOF) data to ascertain the City's current population estimate which has been identified as 313,676 people. The DOF data also identifies current average household size is 3.05 persons per household. However, the subsequent analysis utilizes the more conservative 2020 DOF factor of 3.28 persons per household from the City's Phase I General Plan Update to project the most conservative number of people the Project site would generate. .

Additionally, this Project is projected to provide a total of 51<sup>1</sup> employees. The Employment projections are based on Riverside County General Plan Appendix E-2: Revised Socioeconomic Build-Out Assumptions and Methodology generation factors of 500 SF per commercial-retail employee (COR GP, Appendix E, p. 3.).

### 5.9.7 Environmental Impacts

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

The proposed Project includes an amendment to the General Plan land use designation and rezone to allow for Mixed-Use Village (MU-V) to permit residential and commercial uses on the currently Commercial designated site. The Project proposes to development 27 residential buildings consisting of 2- and 3- story structures allowing for a total of 388 residential units and two commercial buildings totaling 25,320 sf located on the southeastern portion of the site.

Current data from DOF of approximately 26 percent from the current population estimate of 313,676 people DOF).

As identified in Section 5.9.6 – Methodology above, assuming a generation factor of 3.28 persons per dwelling unit, the Project would generate 1,273 persons<sup>2</sup>. This results in an increase of 0.4 percent over current City population and an increase of 0.3 percent of City's 2045 buildout projections; neither of

1. Derived by dividing proposed commercial-retail square footage of 25,320 by a generation factor of 500 square foot/employee resulting in approximately 51 employees.
2. Based on household generation factor of 3.28 people per dwelling unit for the City of Riverside (GPU EIR, p. 3.9-5).

which represent substantial growth. Hence, impacts related to substantial unplanned growth would be less than significant.

RHNA for the 6<sup>th</sup> Cycle planning period has projected the City is obligated to provide for 18,458 units to meet their fair share allocation of RHNA requirements. The City self-prescribed a target 30 percent over SCAG's target in order to include a "No Net Loss" buffer consistent with SB 166 resulting in the City goal to provide for 24,000 units as identified in **Table 5.9-C**, above. (GPUI, p. HE-TBR 101)

Because the City is built-out and has self-prescribed a buffer increasing target housing beyond RHNA requirements, the City has adopted a number of policies to help meet these goals by reducing and removing governmental barriers; specifically policies HE-5-1 through HE-5-6. (GPUI, p. HE22-HE23). . The Project will be able to develop the underutilized the Project site for mixed-use, By introducing mixed uses to the Project site, the proposed rezone and general plan amendment will allow for residential uses. The ability to provide residential uses will provide the City an opportunity to help fulfill RHNA housing needs. The Project proposes to provide 388 dwelling units which will allow the City to move closer to the City's fair share of RHNA allocation.

As demonstrated in **Table 5.9-B**, SCAG predicted that the City would have a Job-to-Housing Ratio of 1.70:1 in 2045 based on population projection of 395,800 persons. The Project would increase the existing population but would provide employment opportunities by adding approximately 51 new jobs.

SCAG predicted that the City would remain a job-rich area with the projected 2045 population growth and implementation of the Project would contribute to employment opportunities within the City, contributing to the City's job to housing ratio. Implementation of the Project may introduce indirect population growth through the introduction of new job opportunities during both construction and operation of the Project site. Employment during construction activities would be short-term in nature. As mentioned in Section 3.0 – Project Description during operation the proposed commercial retail portion of the Project site is estimated to employ approximately 51 employees. Additionally, the project will not create indirect population growth because the Project would not require the expansion of infrastructure and utilities to service the Project. Because existing infrastructure is already in place and the Project does not include any construction, the Project would not remove any obstacles to population growth. Moreover, the Project does not propose construction of any new major infrastructure facilities that create indirect growth and impacts.

The Project is consistent with applicable General Plan policies related to housing and infill development, as outlined above. Additionally, implementation of the Project would provide the City opportunities to help fulfill State RHNA housing requirements and would represent growth that is less than one percent of buildout projections. Thus, the Project would not induce substantial unplanned population growth. Therefore, the impacts would be **less than significant**.

### 5.9.8 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). There are no mitigation measures required to reduce impacts to since less than significant impacts to population and housing are anticipated from implementation of the Project. Therefore, no mitigation measures are required.



### **5.9.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

Less than significant impacts to population and housing are anticipated from implementation of the Project. There are no mitigation measures required to reduce impacts to Population and Housing.

## 5.10 Public Services

The focus of this section is to analyze potential impacts related to Public Services, including fire protection, police protection, schools, and libraries. The following discussion addresses the potential for adverse impacts that could result from the construction and operations as a result of the Project. Cumulative impacts related to this topic are discussed in Section 7.0 – Other CEQA Topics. Park services are addressed in Section 5.11 – Recreation of this Draft EIR.

### 5.10.1 Setting

The City of Riverside (City) is located in the northwestern portion of Riverside County. The City is bounded on the north by the Cities of Jurupa Valley, Colton, and Grand Terrace and the unincorporated community of Highgrove, to the east by the City of Moreno Valley, to the south by the unincorporated community of Woodcrest, and to the west by the Cities of Corona and Norco. The Project entails an approximately 17.43 gross acre site located at the northeast corner of Arlington Avenue and Streeter Avenue as discussed in Section 3.0 – Project Description of this Draft EIR. The Project site is located within the City’s Magnolia Center neighborhood. Discussion of Project parcel throughout this document is based upon net acreage of 17.37 acres.

### Fire Protection Services

The Riverside Fire Department (RFD) provides fire protection for the City. RFD is an all-hazard emergency service agency that provides fire protection, emergency medical services, fire safety inspections, community education, and emergency preparedness planning and training for the City. RFD covers six divisions: Administration, Fire Prevention, Operations, Special Services, Urban Search and Rescue, and Training. RFD’s major facilities includes 14 fire stations located throughout the City, Administration/Prevention offices, an Emergency Operations Center, and a Fire Training Center to advance the training of personnel. (GPUJ FEIR, p. 3.10-1). The two closest fire department are Station 5 – Airport, which is approximately 0.8 miles east of the Project site, and Station 3 – Magnolia Center (Midtown), which is approximately 1.7 miles west of the Project Site. (GE)

Station 5 – Airport serves the Airport neighborhood and portions of the Ramona, Grand, and Magnolia Center neighborhoods. Station 5 is a multi-company station staffing Engine 5, Squad 5, and Breathing Support 5. On duty Station 5 personnel include one captain, one engineer, one firefighter and two firefighter/paramedics. Station 3 – Magnolia Center (Midtown) serves the Magnolia Center and Wood Streets neighborhoods and portions of the Victoria, Grand, Casa Blanca, Ramona, and Hawarden Hills neighborhoods. Station 3 is a multi-company station staffing Engine 3, Truck 3, and Rescue 3. On duty Station 3 personnel include; two captains, two engineers, two firefighter/paramedics and one firefighter. (RFD).

The City’s Fire Department Operations Division responds to over 41,000 service calls annually and has an average response rate of approximately 7 minutes and 59 seconds (RFD-SP, p. 12). RFD has established a performance goal for emergency response to arrive within 8 minutes of dispatch over 90 percent of the time, slower than the 5-minute response time that is generally preferred by fire officials for urban areas. It is a long-term goal of the City to provide a high level of service to the community. (GPUJ FEIR, p. 3.10-3).

**Police Protection Services**

The Riverside Police Department (RPD) provides police protection services to the City from four RPD stations. The locations and services provided at each station are shown below in **Table 5.10-A, Riverside Police Stations**.

**Table 5.10-A, Riverside Police Stations**

Station	Address	Services/Divisions	Personnel	Ward
Orange Station	4102 Orange Street	Headquarters, Support Services Division – Personnel Bureau, Community Services, Records Bureau, and Administrative Functions	70	1
Lincoln Station	8181 Lincoln Avenue	Field Operations Division – Patrol/Traffic Functions, and Technical Services Unit (Bomb Squad)	184	4
Magnolia Station	10540 Magnolia Avenue	Investigations and Special Operations Divisions – Investigations, Forensics, Property Room, Communications (Dispatch), Neighborhood Policing Centers, and Training Bureau	281	6
Aviation	7020 Central Avenue	Air Support, METRO (SWAT) Team	25	3
Source: GPUI FEIR, p. 3.10-4, Table 3.10-2				

The Field Operations Division provides first response to all emergencies, performs preliminary investigations, and provides basic patrol services for the City. The Field Operations Division is managed by a Captain who oversees patrol officers, sergeants, lieutenant Watch Commanders, an Executive Lieutenant, and civilian support staff. The Field Operations Division includes over 130 patrol officers, 24 Sergeants, six Lieutenant Watch Commanders, one Executive Lieutenant, one Traffic Lieutenant, and a civilian support staff position. (GPUI FEIR, p. 3.10-4).

The City has reconsidered RPD’s centralized form of organization, and RPD has implemented a decentralized Neighborhood Policing Center model in an effort to provide more equitable and responsive services across the City. Additionally, RPD does not use a formula for calculating the number of officers per capita. According to the RPD Policy Manual, adequate staffing ensures that proper supervision is available for all shifts. (GPUI FEIR, p. 3.10-4).

The precinct-based system of the police department automatically assigns officers to certain districts of the City which allows the officers to become more familiar with the areas of the community they are assigned to. This method is called community policing and it balances the reactive responses to calls for service with proactive problem-solving to prevent crime incidences. There are two essential criteria for police response. The first criteria are Priority One calls and these are considered urgent calls which include life-threatening incidences such as an in-progress robbery or a bodily injury. Police officers typically respond to Priority One calls within seven minutes from the time calls for service are received. The second criteria is Priority Two calls. These calls are less urgent and include non-life-threatening

incidences such as past burglary, petty theft, shoplifting, etc. and these calls are typically responded to within twelve minutes. (GPUI FEIR, p. 3.10-4).

## **Public Schools**

The Project site is within the boundaries of the Riverside Unified School District (RUSD). RUSD is the 14<sup>th</sup> largest school district in California and serves approximately 42,000 students across 47 schools in Riverside. The RUSD operates 30 elementary schools, one special-education preschool, seven middle schools (grades 7–8), five comprehensive high schools, two continuation high schools, and the Riverside Virtual School. Additionally, RUSD has approximately 7,000 adult education students enrolled in its District. (GPUI FEIR, pp. 3.10-43.10-5). Per RUSD’s School Locator, school-aged children are expected to attend the following schools; Jefferson Elementary School (4285 Jefferson Street) located 0.35 miles southwest, Sierra Middle School (4950 Central Avenue) located 0.44 miles northeast and Romona High School (7675 Magnolia Avenue) located 0.55 miles south. (RUSD-B; GE)

## **Charter Schools**

Charter schools are public schools that are created or organized by a group of teachers, parents, community leaders, or a community-based organization. Charter schools may provide instruction in any grades K–12 and are generally sponsored by a local public school board or county board of education. Specific goals and operating procedures for the charter school are detailed in an agreement (or “charter”) between the sponsoring board and charter organizers. Public charter schools may not charge tuition and may not discriminate against any pupil on the basis of ethnicity, national origin, gender, or disability.

The State of California charters one school in the Riverside area: River Springs Charter. River Springs Charter has multiple schools which overall serves grades TK-12. (CDE).

## **Libraries**

The Riverside Public Library (RPL) system provides library service to the City. Eight RPL libraries serve the City in addition to libraries and three universities (University of California Riverside, La Sierra University, California Baptist University) and Riverside City College. The closest libraries to the Project site are the Marcy Branch approximately one mile west of the Project site and the SSgt. Salvador J. Lara Casa Blanca Library approximately 1.5 miles southwest of the Project site. (GPUI FEIR, p. 3.10-7.)

Collectively, RPL offers the following services at their library locations: books and E-media, including E-books; Wi-Fi and internet access; computer, laptop, and iPad access; printing; home delivery of books and audiovisual materials; Technology and literacy programs; reference and research services; public meeting rooms; veteran resource center; community outreach efforts; annual summer reading program; cultural programming; makerspace containing computers, 3-D printers, audio and video capture and editing tools; and traditional arts and crafts supplies; youth services; and toy-lending library. (GPUI FEIR, p. 3.10-7).

Library service needs and standards are determined by the following methods: volumes by population; community need/service gaps (including services provided/not provided by other area departments and agencies); customer requests; and innovation/success of pilot projects. The City does not collect assessed development impact fees on the library’s behalf. Library funding sources include the General Fund, trust funds, gift funds/donations, grants, and the Riverside Library Parcel Tax. (Measure I).



## 5.10.2 Related Regulations

### Federal Regulations

There are no federal regulations directly applicable to public services with respect to this Project.

### State Regulations

#### *California Fire Code*

The California Fire Code (Title 24, Part 9) is based on the 2021 International Fire Code and includes amendments from the State of California fully integrated into the code. The California Fire Code contains fire safety related building standards referenced in other parts of Title 24 of the California Code of Regulations (CCR), also known as the California Building Standards Code (BSC).

#### *California Building Code*

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the California Building Code (CBC) within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission and the code is also known as Title 24 of the California Code of Regulations. The most recent building standard adopted by the legislature and used throughout the state is the 2022 version of the CBC, often with local, more restrictive amendments that are based upon local geographic, topographic, or climatic conditions. These codes provide minimum standards to protect property and the public welfare by regulating various aspects of the design and construction of buildings. (BSC).

#### *Assembly Bill 2926 and Senate Bill 50 (California Government Code 65996)*

To assist in providing school facilities to serve students generated by new development projects, the state passed Assembly Bill (AB) 2926 in 1986. This bill allows school districts to collect impact fees from developers of new residential and commercial/industrial building space. Development impact fees are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of costs for construction, modernization, and reconstruction projects. (AB 2926).

Senate Bill (SB) 50, which passed in 1998, provides a comprehensive school facility financing and reform program, and enables a statewide bond issue to be placed on the ballot. The provisions of SB 50 allow the state to offer funding to school districts to acquire school sites, construct new school facilities, and modernize existing school facilities. SB 50 also establishes a process for determining the amount of fees developers may be charged to mitigate the impact of development on school facilities resulting from increased enrollment. Under this legislation, a school district could charge fees above the statutory cap only under specified conditions, and then only up to the amount of funds that the district would be eligible to receive from the state. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.” (SB 50).

### Regional Regulations

There are no regional regulations directly applicable to these public services with respect to this project.

### Local Regulations

#### *City of Riverside 2025 General Plan*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. E-19, PS-29, PS-31, PS-32, PS-34, PS-35):

**Education Element**

Objective ED-5: Ensure that the library system remains a premier information and independent learning resource for the Riverside residents and a complement to formal education.

Policy ED 5.1 Provide ample and convenient library facilities.

**Public Safety Element**

Policy PS-6.1 Ensure that sufficient fire stations, personnel and equipment are provided to meet the needs of the community as it grows in size and population.

Policy PS-6-3: Integrate fire safety considerations in the planning process.

Policy PS 6.7 Continue to involve the City Fire Department in the development review process.

Policy PS 7.1 Deploy human and financial resources to ensure adequate and equitable distribution of police services.

Policy PS-7.2 Support the transition of the Riverside Police Department from a centralized agency to one built around precincts as a means of providing more rapid, equitable and proactive community policing services.

Policy PS -8.2 Promote land use and design policies and regulations which encourage a mixture of compatible land uses to promote and increase the safety of public use areas and of pedestrian travel.

Policy PS-8.4 Coordinate efforts between the Police Department and Planning Division to develop guidelines for implementation of CPTED-related issues.

Policy PS-8.5 Continue to encourage residents and apartment managers to become involved in the Crime Free Multi-Housing Program as a way to reduce crime in apartment communities.

*City of Riverside 2025 General Plan EIR*

There are no applicable mitigation measures from the 2025 General Plan EIR that pertain to Public Safety.

*City of Riverside Phase I General Plan Update*

The City of Riverside Phase I General Plan Update contains objectives and policies that are considered applicable to the proposed Project, as identified below (GPUI, pp.15-16):

**Public Safety Element**

Policy PS-4 Emergency Services: Provide Responsive police, fire, and emergency services to all residences and businesses in Riverside.

Action Plan PS-4.2-3 (Emergency Preparedness) Through the Development Review Committee and plan check process, require new and redeveloped structures and facilities to adhere to Riverside Municipal Code Title 16, California Fire Code (as amended), the International Building and Fire Code and other applicable local, state, and national fire safety standards.

*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUI EIR that pertain to Public Safety.

*Riverside Municipal Code*

**Chapter 16.52 – Development Fees for Fire Stations.** This Chapter provides for the collection of development fees to be utilized for the purchase of land for and the construction of fire stations and the acquisition of equipment and furnishings to equip fire stations. The fee is required to be paid prior to issuance of a building permit for new development (MC). However, to date, the City has not adopted a resolution establishing those development fees, so no fees are currently being collected. RFD implemented service improvements through application of Riverside Measure Z funding and achieved an Insurance Services Office (ISO) Rating of ISO Class 1, the highest awarded level in December 2019. Measure Z also continues to provide funding for RFD staff positions, training, and vehicle replacement and maintenance.

**Chapter 16.56 – School Development Fee.** This chapter provides for the collection of a school development fee as established by a school district for school facilities. The fee shall be paid prior to the issuance of a building permit for a proposed residential development. The proposed Project is subject to payment of the established school development fee for RUSD.

*Measure Z*

Measure Z is a one-cent transaction and use tax (similar to a sales tax) approved by Riverside voters on November 8, 2016, to help pay for critical unfunded City programs and services. Measure Z was placed on the ballot at the recommendation of City staff to fund critical needs such as first responder staffing and vehicles, road, tree maintenance, and building repair and maintenance. Measure Z is projected to generate approximately \$48,00,000 in annual revenues through 2036 unless extended by the voters. (MZ).

### 5.10.3 Comments Received in Response to the Notice of Preparation

No comments were received regarding recreation in response to the Initial Study/Notice of Preparation (IS/NOP).

### 5.10.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the Initial Study (Appendix A) prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, and libraries.

### 5.10.5 Project Design Features

Design features refer to ways in which the proposed Project will avoid or minimize potential impacts through the design of the Project. The proposed Project has been designed with sensitivity to the adjacent land uses and the existing residential neighborhoods surrounding the site. The proposed Project will include exterior building lights and pedestrian lighting for safety and security purposes within parking lots, along pathways, and on buildings as identified in **Figure 3.0-30** in Section 3 – Project Description of this Draft EIR. The residential portion of the Project will be gated. Existing streetlights are located along Streeter Avenue and Arlington Avenue within the right-of-way.

### 5.10.6 Methodology

The following discussion analyzes potential impacts to public services based on the specific service ratios, response times, or infrastructure requirements of each public service.

### 5.10.7 Environmental Impacts

**Threshold:** *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:*

As discussed in Section 3.0 – Project Description of this Draft EIR, the Project proposes development of a 576,203 square foot (sf) mixed-use apartment community. The residential component of the project will consist of 546,474 sf of residential use that will include 27 residential apartment buildings consisting of 2- and 3-story structures. The residential portion of the site would provide for a total of 388 residential dwelling units and one clubhouse/fitness/leasing building. The commercial component of the Project will develop 25,320 sf of commercial-retail use (20,320 sf for grocery and 5,000 sf for retail) via two commercial buildings. As discussed in Section 5.9 – Population and Housing of this Draft EIR, the Project is expected to increase the City’s population by approximately 1,273 persons and generate approximately 51 employees. This increase in population and employment has the potential to increase demand for public services. A detailed discussion regarding impacts to recreational parks can be found in Section 5.11 – Recreation.

### Fire Protection Services

Demand for fire protection services, in the form of new service calls, may increase as a result of Project implementation from both the residential and commercial uses. Based on the City’s Fire Department Incident Data<sup>1</sup>, the last incident reported on the Project site was in November 2019, while the Project site was being utilized for commercial-retail purposes. The Project site has been vacant since 2020. It is anticipated that re-development of the Project site would result in an increase of service calls in comparison to its current state. State, county, and City jurisdictions have policies related to providing adequate fire services. All Project-related development would be constructed in accordance with current building and fire/life/safety ordinances and codes, including all applicable code requirements related to construction, access, water mains, fire flows, and hydrants. GP 2025 Public Safety Element, Policy PS-

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<sup>1</sup> City of Riverside Fire Department provided Project site Data via email December 19, 2023.



6.1 ensures that sufficient fire stations, personnel, and equipment are provided to meet the needs of the community as it grows in size and population. (GPUJ FEIR, p. 3.10-18).

The closest fire stations to the Project site are Station 5 – Airport and Station 3 – Magnolia Center (Midtown). These stations are expected to serve the Project site. While the increase dwelling units of the project would likely result in increased service calls to these stations, the Project proponent will be required to enter into a cost contribution agreement to pay for the incremental increase to fire services which will reduce any impacts resulting from the Project.

State, county, and City jurisdictions have policies related to providing adequate fire services to the area. All Project-related development would be constructed in accordance with current building and fire/life/safety ordinances and codes, including all applicable code requirements related to construction, access, water mains, fire flows, and hydrants. Additionally, the Project does not propose to use substantially hazardous materials or engage in hazardous activities that will require new or expanded fire protection facilities to meet potential emergency demand. Hence, any incremental impacts to the provision of fire protection or emergency medical facilities and services will be offset from funds identified within the cost contribution agreement that Project will be required to enter into with the City for fire services.

As such, impacts to fire protection services would be **less than significant**.

### **Police Protection Services**

Demand for police protection services, in the form of new service calls, may increase as a result of Project implementation from both the residential and commercial uses. While an incremental increase in law enforcement calls to the Project site may occur, such calls would be consistent to the types of calls RPD responds to at the existing area. GP 2025 policy PA-7.5 strives to provide minimum response times of seven minutes on all Priority 1 calls and twelve minutes on all Priority 2 calls. The Lincoln Police Station is nearest the Project site at just under 3 miles southwest of the Project so the City would continue to meet the recommended police response times (7 minutes for Priority 1 calls and 12 minutes for Priority 2 calls) Based on location of this station. RPD is required to evaluate its budget annually to provide adequate police services to accommodate additional growth in the City in accordance with GP 2025 policy PA-7.1. As such, the Project proponent would be required to contribute to police services as assessed to reduce any impacts. Further, the Project would be required to comply with all State, County, and local regulations which ensure sufficient police protection service and facilities are available to accommodate existing and future population.

As such, impacts related to police services would be **less than significant**.

### **Schools**

As discussed in Section 5.9 – Population and Housing, the Project’s residential component is expected to increase population within the City by approximately 1,273 persons, which will increase the numbers of school-aged children within RUSD. The combined student generation rate for multi-family units within RUSD as set forth in the *School Fee Justification Study 2022*, is 0.239 students per dwelling unit. Based on the 388 proposed dwelling units, the residential component of the Project is expected to generate approximately 93 students. Based on the neighborhood shopping center student generation rate of 0.2979 students per 1,000 sf, as set forth in the *School Fee Justification Study 2022*, and 25,320 sf of commercial uses, the commercial component of the Project is expected to generate approximately 8 students. Thus, the Project is anticipated to generate a total of approximately 101 students.

As of the 2022-2023 school year data 52 percent of RUSD’s school aged children are elementary school students, 15 percent are middle schoolers and 33 percent are highschoolers. (DQ-A) Assuming that the projected students will follow similar age group patterns as the existing RUSD’s population it is anticipated that approximately 53 students will be elementary school students, 15 will be middle school students, and 33 will be high school students<sup>2</sup>.

**Table 5.10-B, Multi-Year RUSD Student Enrollment** below, shows recent student enrollment trends for the schools anticipated to be affected by the proposed Project.

**Table 5.10-B, Multi-Year RUSD Student Enrollment**

Academic Year	Jefferson Elementary School Number of Students	Sierra Middle School Number of Students	Ramona High School Number of Students
2022-23	920	830	2,220
2021-22	901	792	2,078
2020-21	953	870	2,213
2019-20	974	840	2,030
2018-19	993	871	2,157
2017-18	1,002	825	2,154
2016-17	1,015	808	2,142

Source: DQ-B, DQ-C, DQ-D

As shown above the student population at Jefferson Elementary has declined since 2016. Sierra Middle school has also seen a similar decline between student enrollments over the year. Ramona High School is currently serving the highest student population of the last 7 years. However, it should be noted that high school enrollment does fluctuate based on student enrollment from middle school and elementary schools from the previous years as students advance to each grade. Thus, since with a current decline in student enrollment for both Jefferson Elementary School and Sierra Middle School, high school enrollment is also expected to decline in the upcoming years. As previously mentioned, it is anticipated that Project implementation will increase the number of elementary school students. As shown in the **Table 5.10-B**, Jefferson Elementary School has previously served a higher population. Nonetheless, the Project will comply with RMC Chapter 16.556 and pay the school development fee established by the RUSD prior to the issuance of building permits. As per AB 2926 and SB 50, the school development fee is charged to developers to mitigate the impact of development on school facilities which may result from increased enrollment and is deemed to provide full and complete school facilities mitigation for impacts to school facilities. (RUSD-A, pp. 10, 19).

As such, through compliance with City policy and payment of development impact fees, impacts related to schools would be **less than significant**.

**Libraries**

The City of Riverside Public Library consists of one Main Library and seven branch libraries. The library system has a collection of approximately 425,000 books and other library materials, 400 public access computers, and an annual circulation of 1.23 million. The Marcy Branch Public Library, covering 4,200 square feet, is located just under one mile from the site. The Arlanza Branch Public Library just under

2. 101 studnets x 0.52≈ 53 students; 101 students x 0.15 ≈15 students; and 101 students x 0.33 ≈33 students.

three miles from the Project site and is a 10,000 square foot library with over 80 computers for public use and houses a starting collection of more than 11,750 items. Further, the City's new main Library which was expanded in 2021 covering 42,000 square feet and providing more than 60,000 items is also anticipated to serve the site. As such, the proposed Project may result in an incremental increase in the use of libraries but is not expected to substantially increase the demand of these services such that construction of new or expanded facilities would be required. While there are no there are no development impact fees that would fund the RPL system, the Project would be required to comply with GP 2025 Education Element Objective ED-5 and Policy ED-5.1, which states that the City is required help to provide ample and convenient library facilities. Compliance with these policies would ensure that the Project would not affect the City's ability to provide adequate libraries. Further, City Council may approve funds as necessary for library services.

As such, impacts related to library facilities and services would be **less than significant**.

### **Conclusion**

Through implementation of PDF's and compliance with all regulatory requirements, the Project will 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. Therefore, impacts would be **less than significant**.

### **5.10.8 Recommended Mitigation Measures**

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Since impacts to fire protection services, police protection services, schools, and libraries are less than significant, no mitigation measures are required.

### **5.10.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

There are no mitigation measures required to reduce impacts to public services.

## 5.11 Recreation

The focus of this section is to analyze potential impacts related to recreation. The following discussion also addresses the potential for adverse impacts that could result from the construction of additional recreational facilities as a result of the Project. Cumulative impacts related to this topic are discussed in Section 7.0 – Other CEQA Topics.

### 5.11.1 Setting

The City provides numerous parks, open spaces, and offers diverse recreation activities and resources. These parks, recreation facilities and activities allow residents of Riverside numerous ways to enhance their quality of life and allow for natural outdoor experiences. The City envisions a “necklace” of parks and open space that exists on and/or defines the edges of the City with connectivity occurring between these spaces and Riverside’s neighborhoods with landscaped parkways and trails accessible to pedestrians and cyclists alike. Together these parks and open spaces embody a broader concept of “Riverside Park,” a citywide park that provides places to find the peace and harmony of nature within or on the edges of the City’s urban fabric. (GP 2025, p. PR-2).

The PMP defines parks as areas that are “intended as public green space where city dwellers can escape for the rush of urban life.” The City categorizes its parks into three categories: Developed Parks, Natural Parks, and Miscellaneous Facilities as described below. (GPUI FEIR, pp. 3.11-2, 3.11-3).

#### Developed Parks

##### *Pocket Parks*

These are small parks that the general public has access to. They are often designed and built in a single lot or smaller parcel. These parks may be created as a component of public space requirements of larger developments and can occur in all manner of settings.

##### *Neighborhood Parks*

These may provide green space, recreation centers, sports facilities, or playgrounds. They are often landscaped and serve a multitude of functions from passive recreation to a planned center for sports activities. They are typically less than 30 acres in total size and will often present themselves as a community or neighborhood focal point.

##### *Community Parks*

These are typically larger parks meant to serve a larger geographic area than the immediate neighborhood. These parks are formed with the intent to engage the community and visitors for longer periods of time and offer more diverse activities and amenities.

##### *Regional Parks*

These are areas preserved to protect or bring attention to natural features, historic significance, or recreational use or other reasons. These parks are administered by a local jurisdiction, usually a city or a county.

##### *Joint-Use Facilities*

These can also be referred to as shared-use or community-use sites. These sites are managed by jurisdictions or quasi-government entities and allow access for community use.



### *Special-Use Facilities*

These cover a broad range of specialized park and recreation facilities, often with a single major use. Golf courses, historical sites, community center sites, theme parks, and water parks are other special-use facilities that fall into this use type.

### *County and State Parks*

These exist within the City of Riverside and the City's Sphere of Influence. Although not directly owned or controlled by the City, these parks also provide recreation opportunities to the community.

## **Natural Parks**

### *Regional Reserves*

These are areas set aside for the protection of wildlife, habitat, and other ecological considerations. There is usually minimal infrastructure within the park beyond trails and signs. These areas may be accessible for low-impact use. (GPUJ FEIR, p. 3.11-2)

## **Miscellaneous Facilities**

### *Private Use Parks*

These are areas that have restricted access and are generally only available for use by the local community, such as a homeowners' association or a private club.

### *Undeveloped City-Owned Property*

This is land owned by the City. It can potentially be leased for use. It also may be projected as a potential park site in the future but is not included in calculations of acres or parkland per thousand people until improved as a Developed Park.

## **Existing Park Supply and Demand**

The City has 68 parks and additional open space areas with approximately 2,940.61 acres of City-owned parkland as reflected in **Table 5.11-A, City-Owned Park/Recreational Facilities**. The City has identified nine undeveloped City-owned park sites in underserved areas of the City that can be developed into parks contingent upon availability of funds. These sites include City Citrus State Park, Golden Star Park, Hole Lake, Mission Ranch Park, Mount Vernon Park, Savi Ranch Park, Seven Mile Trail, Tequesquite Open Space, and Victoria Cross Park (GPUJ FEIR, p. 3.11-1). Note that there are four parks within the City that are not owned by the City totaling 131.74 acres: 1) AB Brown Sports Complex; 2) Riverwalk Parkway; 3) City Citrus State Park; and 4) Mount Vernon Park. Those parkland acres are not included below.

**Table 5.11-A, City-Owned Park/Recreational Facilities**

<b>Facilities</b>	<b>Size (Acres)</b>
<b>Developed Parks</b>	
Pocket Park	3.50
Neighborhood Park	225.57
Community Park	370.18
Regional Park	279.45
Joint-Use Facilities	Not Included
Special Used Facility	97.54
<b>Natural Parks</b>	
Regional Reserve	1,615.33
<b>Miscellaneous Facilities</b>	
Undeveloped City-Owned Property	349.05
Total City-Owned Property	2940.61
<b>Total City Owned Acres excluding Undeveloped City Owned Property</b>	<b>2,595.07</b>
Source: GPUI FEIR, p.3.11-2	

The existing parkland-to-resident ratio is 6.07 acres per 1,000 residents citywide. The projected parkland-to-resident ratio remains compliant with both the current standard of 3 acres per 1,000 residents and the suggested standard of 5 acres per 1,000 residents. New development is required to provide facilities to serve its own needs. Potential population growth may exacerbate the already-existing neighborhood parkland deficiencies but, for the reasons explained above, would not lead to a further substantial physical deterioration of existing recreational facilities. Further, the City has signed joint-use agreements with the Alford Unified School District to use aquatic facilities and with Riverside Unified School District and Ramona High School to use the stadium at the school campus. As stated in the City of Riverside’s *Comprehensive Park, Recreation & Community Services Master (PMP)*, the City will continue to look for opportunities to implement joint-use agreements with the local school districts. (PMP)

### **5.11.2 Related Regulations**

#### **Federal Regulations**

No federal regulations would be applicable to recreation with respect to recreation.

#### **State Regulations**

*Quimby Act (California Government Code 66477)*

The Quimby Act was established by the California legislature in 1965 to provide parks for the growing communities in California. The Act authorizes cities to adopt ordinances addressing parkland and/or fees for residential subdivisions for the purpose of providing and preserving open space and recreational facilities and improvements. The Act requires the provision of 3 acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case the City may adopt a higher standard not to exceed 5 acres per 1,000 residents. The Act also specifies acceptable uses and expenditures of such funds. Because the City of

Riverside is a Charter City, it is not subject to the Quimby Act, but the City does base their analysis and imposition of appropriate Park Development Impact Fees on requirements of the Quimby Act. (GP 2025 FEIR, p. 5.14-13)

*Proposition 40 Park Bond Act*

Proposition 40 is intended to maintain a high quality of life for California’s growing population by providing a continuing investment in park and recreational facilities. Specifically, it is for the acquisition and development of neighborhood, community, regional parks and recreation land, as well as facilities in urban and rural areas. Eligible projects for Proposition 40 funding include the acquisition, development, improvement, rehabilitation, restoration, or enhancement of interpretive facilities, local parks, recreational land, or other related facilities. Funds are distributed based on the City’s population.

*California Public Park Preservation Act*

The California Public Park Preservation Act is the primary instrument for protecting and preserving parkland. Under the California Public Resources Code Sections 5400-5409, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land or both is provided to replace the parkland acquired. It provides that a public agency that acquires public parkland for non-park use must either pay compensation that is sufficient to acquire substantially equivalent substitute parkland or provide substitute parkland of comparable characteristics. This act ensures no net loss of parkland and facilities. However, the Project would not acquire parkland for non-park use, and this act would not apply.

**Regional Regulations**

No regional regulations would be applicable to recreation with respect to recreation.

**Local Regulations**

*City of Riverside General Plan*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project as identified below (GP 2025, pp. PR-15 – PR-18, OS-5, LU-27, LU-29 LU-30, PF-40):

***Park and Recreation Element***

- |                |  |
|----------------|--|
| Objective PR-1 | Provide a diverse range of park and recreational facilities that are responsive to the needs of Riverside residents.   |
| Policy PR-1.1  | Implement the policies of the City of Riverside <i>Comprehensive Park, Recreation &amp; Community Services Master</i> . Revise the neighborhood/community park ratio standard to two acres of community park and one acre of neighborhood park per one thousand residents. |
| Policy PR-1.3  | Encourage private development of recreation facilities that complement and supplement the public recreational system.  |
| Policy PR-1.6  | Develop standards to design park facilities and landscaping that enhance and preserve natural site characteristics as appropriate, to minimize maintenance demands and to incorporate xeriscape (low-water demand) principles where feasible.                              |

- Objective PR-2 Increase access to existing and future parks and expand pedestrian linkages between park and recreational facilities throughout Riverside.
- Policy PR-2.1 Integrate public transportation routes when locating regional reserve parks, community parks and community centers.
- Objective PR-3 Engage Riverside residents and the business community in planning for recreation and service needs.
- Policy PR-3.1 Consider the needs of all age groups, abilities, disabilities and special interest groups in park and recreation planning and design.

***Open Space/Conservation Element***

- Objective OS-1 Preserve and expand open space areas and linkages throughout the City and sphere of influence to protect the natural and visual character of the community and to provide for appropriate active and passive recreational uses.
- Policy OS-1.6 Ensure that any new development that does occur is effectively integrated through convenient street and/or pedestrian connections, as well as through visual connections
- Policy OS-1.8 Encourage residential clustering as a means of preserving open space.
- Policy OS-1.11 Develop a program for City acquisition of identified open space land and encourage land donations or the dedication of land in lieu of park fees for the acquisition of usable land for public parks, open space, and trail linkages.

***Land Use and Urban Design Element***

- Objective LU-9 Provide for continuing growth within the General Plan Area, with land uses and intensities appropriately designated to meet the needs of anticipated growth and to achieve the community's objectives.
- Policy LU-9.2 Evaluate proposed amendments to the Land Use Policy Map (Figure LU-10) to consider the effect such amendments will have on the City's ability to achieve its objectives.
- Policy LU-9.5 Encourage the design of new commercial developments as "integrated centers," rather than as small individual strip development. Integrate pedestrian access, parking, access, building design and landscape themes across all parcels in the commercial center to unify the development.
- Objective LU-11 Create a network of parkways to establish stronger linkages between Riverside's neighborhoods, major elements of its natural environment and neighborhood parks and schools.
- Policy LU-11.1 Recognize parkways as distinctive elements of the City's circulation network.
- Policy LU-11.2 Recognize Victoria Avenue, Magnolia Avenue/Market Street, University Avenue, Van Buren Boulevard, Riverwalk Parkway, La Sierra Avenue, Arlington Avenue,



Canyon Crest Drive, and Overlook Parkway as the fundamental elements of the City's parkway landscape network, and components of Riverside Park.

Policy LU-11.3 Seek opportunities to provide enhanced bicycle and pedestrian usage along parkways through the development process.

Objective LU-20 Recognize and enhance Arlington Avenue as a cross-city roadway that connects east to west.

Policy LU-20.1 Develop a landscaped parkway with distinctive signage that promotes the function of Arlington Avenue as a roadway that connects and links many neighborhoods and business centers.

**Public Facilities and Infrastructure Element**

Objective PF-10 Meet the varied recreational and service needs of Riverside's diverse population.

Policy PF-10.1 Provide every neighborhood with easy access to recreation and service programs by decentralizing community centers and programs. Promote the development of shared facilities and satellite offices in each Riverside neighborhood.

Policy PF-10.2 Work cooperatively with the Riverside Transit Agency to improve transportation services to community centers for those who rely on public transportation, such as seniors, the disabled and teenagers.

Policy PF-10.4 Ensure that youth activities and programs are provided or are accessible by all neighborhoods, either in City facilities or through joint-use or cooperative agreements with other service providers.

*City of Riverside 2025 General Plan EIR*

The following are applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to Recreation (GP 2025 FEIR, p. 5.14-24).

**Mitigation Measure MM Rec 1:** All future development shall provide developed parks as part of their project approvals at the discretion of the City Parks, Recreation and Community Services Department, or pay applicable Park Development Impact Fees to the City of Riverside Parks, Recreation and Community Services Department prior to issuance of building permits.

*City of Riverside Phase I General Plan Update*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project as identified below (GPU I p. HE20; HE-AP9):

**Housing Element**

Policy HE-4 Thriving Neighborhoods. Facilitate and encourage a variety of new housing types, including both single- and multi-family and missing middle housing, and the necessary public amenities to support a sense of community that results in equitable and sustainable neighborhoods.

*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUI EIR that pertain to Recreation.

*City of Riverside Municipal Code*

The following section of the City's Municipal Code are applicable and pertain to Recreation (MC):

**Chapter 16-44 – Regional Parks and Reserve Parks Development Fee.** The purpose of this chapter is to provide for the payment of a development fee to be utilized for the acquisition and development of regional parks and reserve parks, and if necessary, to be utilized for interfund borrowing for local parks.

**Chapter 16.60 – Local Park Development Fees.** The purpose of the Local Park Development Fee is to enable the acquisition and/or development and/or improvement of neighborhood and community parks to provide both passive and active recreational opportunities to the residents of the City of Riverside in order to improve the quality of life and for the public health, welfare, and benefit. New development within the City generates a need for added facilities and an increased demand upon existing facilities, and the imposition of a Local Park Development Fee upon such new development is necessary to provide funding for such new or improved facilities meeting established standards for such new development.

**Section 9.08.110 – Park hours and closure.** Hours of operation. All parks owned by the City of Riverside or to be hereafter owned by the City of Riverside, shall be closed from 10:00 p.m. to 5:00 a.m. for developed parks, and closed from a half hour after sunset to a half hour before sunrise for undeveloped parks, except for those uses noted in Section 9.08.110(C.) or 9.08.120.

1. "Developed park" means park acreage that has been improved with typical park amenities such as turf, trees, irrigation, children's play equipment, and picnic areas.
2. "Undeveloped park" means park acreage established for the protection and stewardship of wildlife, habitat, and other natural systems support functions with minimal infrastructure which may include trails, signage, staging areas, parking, restrooms, picnic tables, and other support facilities.

*City of Riverside Comprehensive Park, Recreation and Community Services Master Plan*

On February 4, 2020, the City adopted the *Comprehensive Park, Recreation & Community Services Master (PMP)* which serves as a guide and implementation tool for the management and development of parks and recreation facilities within the city boundaries. The PMP builds on previous planning efforts and provides an up-to-date understanding of the current and future recreation facility and program needs and opportunities within the city. The purpose of the PMP is to: (PMP, p. 18)

- Revise the City's park standards to reflect the current ratio of 1.0 to 2.0 in favor of community parks;
- Establish new park designations and categories to eliminate redundancy and confusion;
- Acquire key remaining open space areas, including La Sierra/Norco Hills, Alessandro and Prenda Arroyos and wildlife corridors
- Create seven (7) new park sites in underserved areas of the City;
- Revitalize existing parks, including Fairmount Park;
- Consider Tequesquite Arroyo for a potential neighborhood park site and Arlington Heights for a potential community park site;

- Partner with schools to increase the areas serviced by recreation programs;
- Improve and create connections between park facilities and increase the safety of the bicycle, equestrian, and pedestrian trails system.

### **5.11.3 Comments Received in Response to the Initial Study/Notice of Preparation**

No comments were received regarding recreation in response to the Initial Study/Notice of Preparation (IS/NOP).

### **5.11.4 Thresholds of Significance**

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

The following Section 5.10 – Public Service threshold questions will be analyzed here in relation to Parks.

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.

### **5.11.5 Project Design Features**

The Project includes design features that integrate recreational areas into residential and commercial spaces that will provide public access to open space areas including promenade areas and a dog park. Furthermore, the Project site offers additional amenities such as outdoor resort style pool and spa, fitness area, clubhouse, shade structures with barbeques and tables, multi-use turf areas, outdoor gaming, play spaces for the on-site residents.

### **5.11.6 Methodology**

The level of significance is evaluated through the evaluation of the proposed Project against the City’s adopted standard of three acres of developed parkland per 1,000 residents and consistency with fee programs relevant to recreational resources. (PMP, p. 78; MC)

### 5.11.7 Environmental Impacts

**Threshold: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

The nearest neighborhood park to the Project site is Don Jones Park located at 3995 Jefferson Street approximately 0.46 miles south of the Project site. The Project is located approximately 0.78 miles southeast of the Nichols Park (Joyce Jackson Community Center) community park located at 5505 Dewey Avenue. It should also be noted that the Project is located approximately 800 feet south of a developed Special Use Parks Facility, Streeter Park/Janet Goeske Senior Center at 5257 Sierra Street. (GE; PMP, p.38) The nearest regional park, which is Non-City owned or maintained is Rancho Jurupa Regional Park located approximately 2.40 miles northeast from the Project site as 4800 Crestmore Road (GE; GP 2025, pp. PR-5 – PR-7). Due to the proximity of the Project site to these recreational areas, nearby facilities may get some usage by the Project residents. However, these regional facilities are designed to serve the region and such use would be expected.

The parkland ratio established in the City’s 2025 General Plan is three acres per 1,000 residents. Currently the City of Riverside, is behind in meeting the established parkland ratio<sup>1</sup>. As identified in Section 5.10 – Population and Housing, since the Project’s estimated population is 1,237 persons, the Project’s parkland demand would be approximately 3.7 acres. <sup>2</sup> Hence, implementation of the proposed Project would increase an existing deficit. However, it is not the responsibility of this Project to correct this deficit, and the Project would be required to pay into Local Park Development Fees per MC Chapter 16.60 – Local Park Development Fees for its fair share contribution. Further, as identified in **Figure 5.11-1, Open Space Plan** and **Table 5.11-B, Project Qualified Open Space Provided** below, the Project will be providing a number of open space and amenity features to serve the Project and neighboring community. **Figure 5.11-1** and **Table 5.11-B** identify areas proposed for open space and the amount of open space that Project would provide that qualifies as parkland. The Project will include a pool and clubhouse. However, these amenities have restricted public access so are not counted as part of the open space provided.

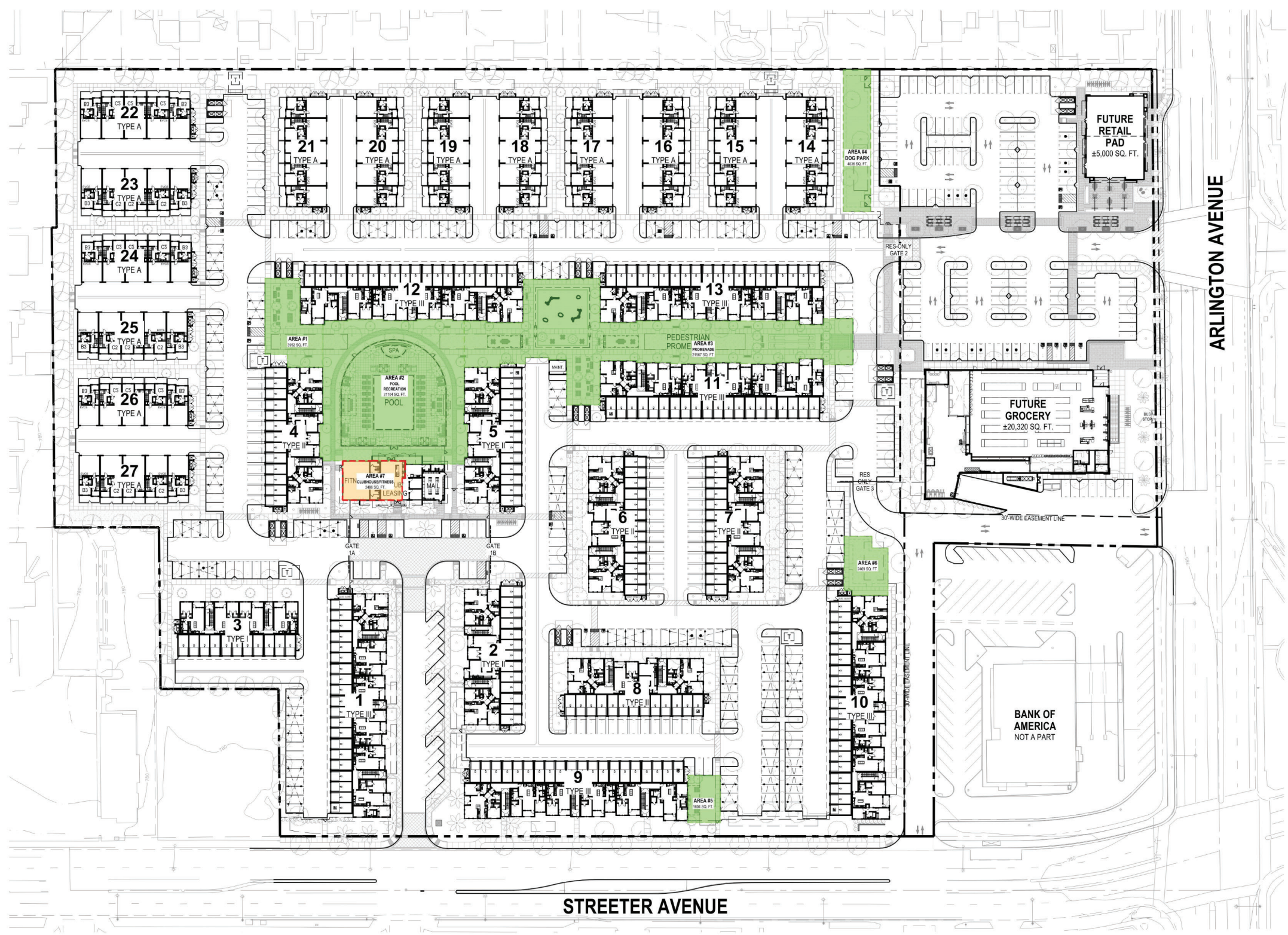
**Table 5.11-B, Project Qualified Open Space Provided**

Qualified Open Space <sup>1</sup>	Square Feet	Acres <sup>2</sup>
Area # 1 Promenade	3,952	0.1
Area # 3 Promenade	21,933	0.5
Area # 4 Dog Park	4,036	0.1
Area # 5 Open Space	1,604	0.0
Area # 6 Open Space	2,469	0.1
<b>Total Provided</b>	<b>33,994</b>	<b>0.8</b>
<b>Notes:</b>		
1. Names listed correspond to <b>Figure 5.11-2</b> .		
2. Numbers were calculated and rounded to the nearest tenth.		

1. Per email from the City’s Park and Recreational Facilities.  
2. 1,237 persons/1,000 x 3 = 3.7).



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**LEGEND**

COMMON OPEN SPACE

INTERIOR AMENITY SPACE

NOTE: COMMON USEABLE OPEN SPACE MAY BE DIVIDED INTO MORE THAN ONE AREA; HOWEVER, AT LEAST ONE AREA SHALL BE A MINIMUM OF 625 SQUARE FEET, WITH NO DIMENSION ON ANY SIDE OF LESS THAN 25 FEET.



Source: Architects Orange, Jun 15, 2023.

NTS

Figure 5.11-1 Open Space Plan  
Arlington Mixed Use





As shown above, the Project will provide approximately 0.8 acres of parkland. The PMP found that there was a strong need for more dog parks identified by the community so it was recommended that the City should explore opportunities for the development of at least one additional dog park, preferably on existing parkland that is underutilized, and would not result in the displacement of a current recreational use. Alternatively, a new facility could be created in an underserved area and where the community has requested a dog park (PMP, p. 130, Exhibit 5.3-2). The Project site is located approximately 2.5 miles southwest of one of the eight locations where the community is requesting a dog park (GE). Thus, by implementing the Project the City is fulfilling a previously identified community need. Additionally, once fully operational the dog park would be required to adhere to MC Section 9.08.110 – Park hours and closure. While the dog park would be open to the public, it will be owned, managed, and maintained by the owners of the Arlington Mixed-Use Development project.

The project will include recreational areas that would supplement the existing recreational facilities in the area. Nonetheless, the Project would provide 2.9 fewer acres of parkland than required based on City requirements. However, in accordance with MC Chapter 16.60 – Local Park Development Fees, the Project would be required to pay Local Park Development Fees. Local park fees are collected by the City as part of the development review process and are used for the purpose of supporting the City’s recreational budget for past and present facilities to serve the community. Thus, through project design features, adherence to municipal code, compliance with conditions of approval, and payment of Local Park Development Fees, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, the impacts would be **less than significant**.

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

The proposed Project plans for approximately 0.8 acres of recreational areas including a public dog park, passive open spaces areas along with 0.5 acres of private amenities such as a clubhouse, workout facility and pool, which are all considered part of the Project’s design and are therefore analyzed throughout this DEIR. Since the Project is already analyzing the environmental effects of the Project as whole, the Project would not require any additional recreational facilities that are not already analyzed as part of this DEIR. Additionally, the Project would be required to pay into Local Park Development Fees per MC Chapter 16.60 – Local Park Development Fees. Thus, the proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities which would substantially impact the environment. Therefore, the impacts would be **less than significant**.

***Threshold: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Parks?***

As discussed above, the public and private park/recreational amenities proposed by the Project are all within the Project analysis included herein. Since the Project is already analyzing the environmental effects of the Project as whole, the Project would not require any additional recreational facilities that are not already analyzed as part of this DEIR. Thus, the proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities which would substantially impact the environment. Therefore, the impacts would be **less than significant**.

### **5.11.8 Recommended Mitigation Measures**

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). There are no mitigation measures required to reduce impacts to less than significant impacts to recreation are anticipated from implementation of the Project. Therefore, no mitigation measures are required.

### **5.11.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

Less than significant impacts on recreation are anticipated from implementation of the Project. Therefore, no mitigation measures are required.

## 5.12 Traffic and Transportation

The focus of this section is to analyze potential impacts related to transportation. The following discussion addresses the potential adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics.

A *Vehicle Miles Traveled Screening Assessment Memorandum* (VMT Memo) dated June 6, 2023, was prepared by Albert A. Webb Associates (WEBB-C) and a *Traffic Impact Analysis* (TIA) dated October 18, 2023 was prepared by Urban Crossroads (URBAN). Both reports are included as Appendix F of this Draft EIR.

### 5.12.1 Setting

The Project site has frontage along Arlington Avenue and Streeter Avenue. The proposed Project consists of an existing vacant but fully developed site with buildings and parking, situated amongst an urbanized area surrounded by existing development. Existing surrounding land uses are described in **Table 3.0-A** found in Section 3.0 – Project Description of this Draft EIR

#### Existing Site Access

There are six existing driveways to access the site: two on Arlington Avenue and four on Streeter Avenue. Current access to the Project site, however, is only available from the two driveways on Arlington Avenue, the southern Driveway on Streeter Avenue that aligns with Molino Avenue and the northernmost driveway on Streeter Avenue that aligns with Granada Avenue. The westernmost driveway on Arlington Avenue and southernmost driveway on Streeter are shared access driveways with the existing property located on the northeast corner of Streeter and Arlington Avenues. The easternmost driveway on Arlington Avenue is signalized and aligns with the driveway into the existing shopping center located south of the site.

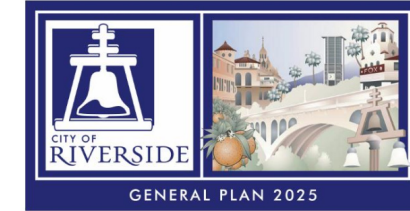
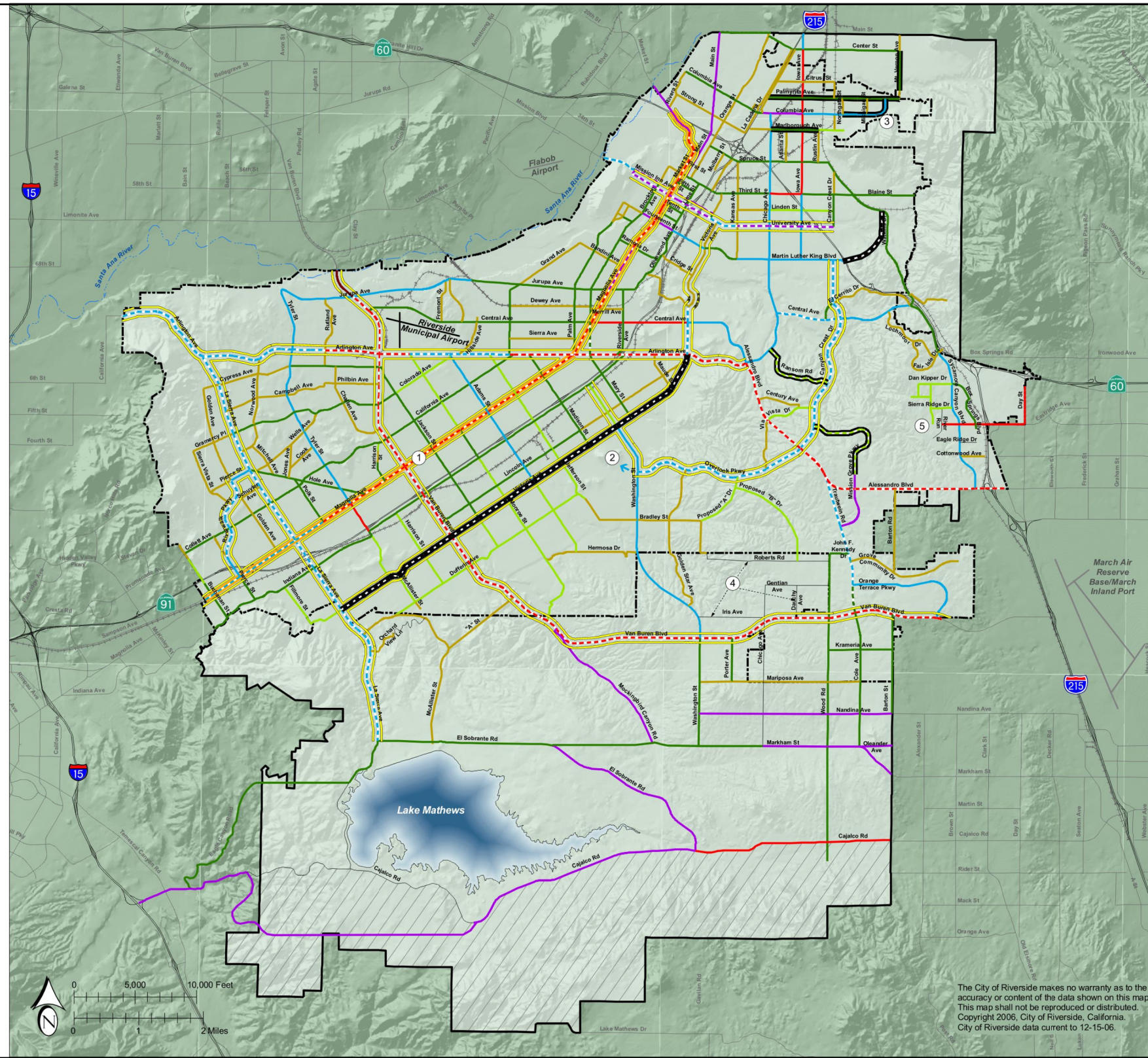
#### Roadway System and Types

The existing street system in the general vicinity of the Project area consists of roadways designated as Arterial Streets, Collector Streets, and Local Streets as reflected on **Figure 5.12-1, Master Plan of Roadways**. The Project area includes the following roadway types:

- **Arterial Streets.** These streets carry through traffic and connect to the state highway system with restricted access to abutting properties. They are designed to have the highest traffic carrying capacity in the roadway system with the highest speeds and limited interference with traffic flow by driveways. The City has five arterial classifications that range from 88-feet of right of way (ROW) with four lanes of traffic to 145-feet of ROW with eight lanes of traffic. There are some arterial streets throughout the City that are also classified as a Parkway and or Scenic Boulevard. (GP 2025, p. CCM-10).
- **Collector Streets.** These streets are intended to serve as intermediate routes to handle traffic between Local Streets and streets of higher classification. The City has two types of collector street widths; 40-foot curb-to-curb width within a 66-foot ROW and 40-foot curb-to-curb width with an 80-foot ROW. (GP 2025, p. CCM-10).



H:\2022\22-0172\GIS\PRO\traffic\_transportation\traffic\_transportation.aprx Map created 10 Jul 2023



**LEGEND**

- 66 FT LOCAL 2 LANES \*
- 66 FT COLLECTOR 2 LANES
- 80 FT COLLECTOR 2 LANES
- 88 FT ARTERIAL 4 LANES
- 100 FT ARTERIAL 4 LANES
- 110 FT ARTERIAL 4 LANES
- 120 FT ARTERIAL 6 LANES
- 144 FT ARTERIAL 8 LANES
- - - - SCENIC BOULEVARD  
REQUIRES SPECIAL LANDSCAPING, ADDITIONAL RIGHT-OF-WAY MAY BE REQUIRED.
- == SPECIAL BOULEVARD  
TWO-LANE DIVIDED ROADWAY OF VARIABLE GEOMETRIC DESIGN
- SPECIAL BOULEVARD  
VARIABLE WIDTHS AND DESIGN, CONTACT PUBLIC WORKS FOR DETAIL. SEE OBJECTIVE CCM-3 AND POLICIES CCM-3.1 THROUGH CCM-3.5.
- PARKWAYS  
FOR INFORMATION ON PARKWAYS SEE LAND USE ELEMENT.
- ▨ CETAP CORRIDOR AREA  
CORRIDOR OPTIONS SUBJECT TO SPECIAL STUDY.
- RIVERSIDE CITY BOUNDARY
- RIVERSIDE PROPOSED SPHERE OF INFLUENCE

**NOTE:**

- \* LOCAL STREETS ARE NOT SHOWN ON THIS PLAN EXCEPT WHERE NEEDED FOR CLARITY.
- ① MAGNOLIA AVENUE SHALL BE A SPECIAL BLVD, WITH 4 LANES EASTERLY OF HARRISON STREET.
- ② OVERLOOK PARKWAY SHALL BE A 2-LANE, 110-FOOT ARTERIAL WITH A WIDE MEDIAN PARKWAY. THE ALIGNMENT OF OVERLOOK PARKWAY WESTERLY OF WASHINGTON IS NOT YET DETERMINED PENDING PREPARATION OF SPECIFIC PLAN LEVEL STUDY.
- ③ COLUMBIA AVENUE IS SHOWN BY HUNTER BUSINESS PARK SPECIFIC PLAN AS A 134-FOOT ARTERIAL. ACTUAL STREET WIDTH, DUE TO RAILROAD OVERCROSSING, WILL BE DETERMINED BY PUBLIC WORKS.
- ④ THESE STREETS SHALL BE 66-FOOT LOCAL ROADWAYS SERVING AS ALTERNATE ROUTES.
- ⑤ THE STREETS IN SYCAMORE CANYON BUSINESS PARK SPECIFIC PLAN VARY IN SIZE. SEE THE SPECIFIC PLAN FOR DETAILS.

SOURCE: CITY OF RIVERSIDE

The City of Riverside makes no warranty as to the accuracy or content of the data shown on this map. This map shall not be reproduced or distributed. Copyright 2006, City of Riverside, California. City of Riverside data current to 12-15-06.

Figure CCM-4  
**MASTER PLAN OF ROADWAYS**

Source: Riverside General Plan 2025, amended 2018.

**Figure 5.12-1 Master Plan of Roadways**  
Arlington Mixed Use





- **Local Streets.** These streets provide vehicular, pedestrian, and bicycle access to property directly abutting the public ROW, with movement of through traffic discouraged. Local streets are designated to have a 36 foot curb-to-curb width with 66-foot ROW and two travel lanes (one in each direction). (GP 2025, pp. CCM-9 - CCM-10).

### Existing Project Roadways

- **Arlington Avenue** is classified as an Arterial roadway as well as a Special Boulevard and Parkway. Arlington Avenue ranges in width from a 110-foot roadway to a 120-foot roadway. Arlington Avenue is an east-west divided roadway with a raised and landscaped median allowing for two lanes of travel in each direction. Arlington Avenue also provides striped bike lanes on both sides of roadway.  
A dedicated left turn lane is provided in each direction of travel at the intersection of Arlington/Streeter Avenues and at the signalized intersection of the easternmost driveway where it aligns with the driveway to the existing Heritage Plaza Shopping Center.  
Arlington Avenue provides an existing curb and gutter and road adjacent concrete sidewalk on both sides of the roadway. Signs provide a posted speed limit of 40 miles per hour (mph) and for no street parking. (GP 2025, p. CCM-16; GE).
- **Streeter Avenue** is classified as an 88-foot wide Arterial roadway. Streeter Avenue is a north-south roadway with a combination of raised median, landscaped median, and striped median allowing for two lanes of travel in each direction.  
A dedicated left turn lane with a raised median is provided in each direction of travel at the intersection of Streeter and Arlington Avenues. A striped center lane is available left-turning northbound traffic to access El Molino Avenue. This same intersection provides a dedicated left turn lane with raised median for south bound traffic to access existing Project site. A dedicated left turn lane with raised median for north and south bound traffic is located at the intersection of Streeter and Granada Avenues (the Projects northernmost existing driveway).  
Streeter Avenue provides an existing curb and gutter and road adjacent concrete sidewalk on the east side of the roadway and an existing curb and gutter with concrete sidewalk with road adjacent landscape buffer on the western side of the roadway. Signs provide a posted speed limit of 40 mph and for no stopping for the entire block (GP 2025, p. CCM-16; GE).

### Offsite Impact Area Roadways

The Project also includes approximately 1.5 miles of offsite impacts located within roadway right-of-way as reflected in **Figure 3.0-4** found in Section 3.0 – Project Description of this Draft EIR. Offsite impacts would affect the following portions of listed roadways:

- Streeter Avenue from north of the Project site to Central Avenue
- Central Avenue from Streeter Avenue to Hillside Avenue
- Hillside Avenue to just before roadway transitions to Mountain View Avenue

The following provides a brief description of the roadways that will be impacted as a result of electric improvements.

- **Streeter Avenue** (north of the Project site) is classified as an 88-foot wide Arterial roadway. Streeter Avenue is a north-south roadway with a striped center median allowing for two lanes of travel in each direction.

A dedicated left turn lane with raised median for northbound traffic is located at the intersection of Streeter Avenue and West Sierra Street. The intersection of Streeter Avenue and East Sierra Street is striped and signalized intersection with crosswalks, dedicated right turn lane for northbound traffic and dedicated left turn lane for southbound traffic. There is a striped center median for northbound travel allowing for left turning movements onto Rochester Street and Scott Avenue. The intersection of Streeter and Central Avenues provides crosswalks and striped dedicated left turn lanes for north and southbound traffic. (GE)

Streeter Avenue provides an existing curb and gutter and road adjacent concrete sidewalk on the east side of the roadway until the intersection of Streeter Avenue and Rochester Street at which time it transitions to an existing curb and gutter with concrete sidewalk with road adjacent landscape buffer on the western side of the roadway. The west side provides an existing curb and gutter with concrete sidewalk and road adjacent landscape buffer. Signs provide a posted speed limit of 40 mph with exception of area near existing school where limits are 25 mph. Signs are also posted for no stopping for the entire block (GE)

- **Central Avenue** is classified as an 88-foot Arterial roadway. Central Avenue is an east-west roadway with a striped center median allowing for two lane travel in each direction. Central Avenue also provides striped bike lanes on both sides of roadway.

The intersection of Central/Streeter Avenues, Central Avenue/Phoenix Avenues, and Central/Hillside Avenues provide crosswalks and striped dedicated left turn lanes for north and southbound traffic.

The south side of the roadway provides an existing curb and gutter with road adjacent concrete sidewalk. A majority of the north side of the roadway provides an existing curb and gutter with road adjacent concrete sidewalk. A portion of the north side of the roadway provides an existing curb and gutter with concrete sidewalk and road adjacent landscape buffer.

Signs provide a posted speed limit of 40 mph and no 4 axle trucks. Street parking is allowed on both sides of the street with exception of a small segment near the intersection of Central/Street Avenues. (GE) (GP 2025, p. CCM-16) The area is already developed, therefore existing curbs and gutters are already in place.

- **Hillside Avenue** is classified as a local street. Hillside Avenue is a north-south roadway allowing for one lane travel in each direction and striped accordingly. The intersection of Hillside/Central Avenues is signalized with crosswalk and provides a striped left turn lane for southbound traffic. All other intersections are stop sign controlled.

Both sides of the roadway provide an existing curb and gutter with concrete sidewalk and road adjacent landscape buffer. The posted speed limit is 25 mph. Street parking is allowed. (GE).

The Project site is just over one mile northwest of the access to State-Route 91, which provides local and regional access to the Project area and is under the jurisdiction of the California Department of Transportation (Caltrans).

## Public Transit

### *Riverside Transit Agency*

Riverside Transit Agency (RTA) is the Consolidated Transportation Service Agency for western Riverside County and is responsible for coordinating transit services throughout the approximately 2,500-square mile service area. RTA provides both local and regional services throughout the region with 33 fixed routes, four CommuterLink Express routes, and Dial-A-Ride services using 334 vehicles. RTA local bus

Routes 1, 10, 12, 13, 14, 15, 16, 20, 21, 22, 27, 29, 49, 51, 59, and CommuterLink Express Route 200 and 204 operate within the City. (RTA)

The Project area is currently served by RTA's Downtown Riverside – Merced & Magnolia Line Route 15 and the La Cadena and Interchange – Downtown- Riverside – Corona Hills Plaza Route 12. Route 15 includes stops that can be accessed by OmniTran and Metrolink and Route 12 includes stops that can be access by Corona Cruisers, which are other transit agencies. Access to the Metrolink stations is also available via Route 15 at both the Riverside-Downtown Station and the La Sierra Station.

Route 12 travels along Streeter Avenue while Route 15 travels along Arlington Avenue in the Project area. The nearest bus stops and shelters are located on Arlington Avenue and Streeter Avenue. A bus shelter for Route 15 currently exists along Arlington Avenue which is situated in front of the location of the proposed ALDI. RTA will replace the shelter once Arlington Avenue has been widened. A bus stop for Route 12 is provided on Streeter Avenue near the intersection of Arlington Avenue.

#### *Metrolink*

Rail service is provided by Metrolink operated by the Southern California Regional Rail Authority, which serves over thirty-five thousand passengers in fifty cities throughout Southern California. Lines traversing the City include the Inland Empire-Orange County Line, which runs between San Bernardino and San Juan Capistrano; the 91/Perris Valley Line, which runs from Riverside to downtown Los Angeles via Fullerton and other points in Orange County; and the Riverside Line, which also runs from Riverside to downtown Los Angeles via Ontario and downtown Pomona. The Riverside-Downtown Metrolink Station is located in close proximity to the Project Site. RTA Route 15 Line has a stop at both the Riverside-Downton Metrolink Station and La Sierra Metrolink Station at this station.

## **Bicycle and Pedestrian Facilities**

The City provides a network of non-vehicular circulation as discussed below.

#### *Bicycle Facilities*

The City completed a four part planning process called the *Riverside PACT Plan* which consists of the following plans: ***P***edestrian Target Safeguarding Plan (PTS), ***A***ctive Transportation Plan (AT Plan), ***C***omplete Streets Ordinance (CSO), and ***T***rails Master Plan (TMP). The Riverside PACT Plan helps the City create robust, sustainable, and accessible transportation options.

*Figure 5-3: Trails, On-Street Facilities, and Destinations* of the City's PACT Plan identifies the City's future bicycle and pedestrian network and improvements. This master plan is based upon recommendations of the 2012 Bicycle Master Plan Addendum, current bicycle level of traffic stress, the demand of existing conditions, and public in-put. (PACT, pp. 1-5, 4-12) In 2020, Caltrans designated four classes of bicycle facilities, which are used in the *AT Plan* and are listed below:

- **Class I – Share Used Paths.** These are paved trails completely separated from the street. They allow two-way travel by people bicycling and walking.
- **Class II – Bike Lanes.** Striped preferential lanes on the roadway for one-way bicycle travel. Some bicycle lanes include a striped buffer on one or both sides to increase separation from the traffic lane or from parked cars where people may open doors into the bicycle lane (buffered bicycle lanes are referred to as Class II Buffered Bike Lane).



- **Class III – Bicycle Routes.** Signed routes where people bicycling share a travel lane with people driving. Because they are shared facilities, bicycle routes are primarily used on select low-speed streets. Some Class III bicycle routes include shared lane markings or “sharrows” that recommend proper bicycle positioning in the center of the travel lane and alert drivers that bicyclists may be present.
- **Class IV – Separated Bikeways.** On-street bicycle facilities that are physically separated from motor vehicle traffic by a vertical element or barrier, such as a curb, bollards, or vehicle parking aisle. They can allow for one- or two-way travel on one or both sides of the roadway.

Based on the *AT Plan Figure 4-20, Bikeway Recommendations*, Arlington Avenue is designated as Class II Bike Lane and currently provides for striped bike lanes on both sides of the roadway; while Streeter Avenue and Central Avenue are designated as Class II Buffered Bike Lanes. Streeter Avenue is currently not striped as a bike lane. Central Avenue is striped for bike lanes.

#### *Pedestrian Facilities*

The implementation of enhanced pedestrian linkage with a comprehensive trails system links residential areas, schools, parks, and commercial centers so that residents can travel within the community without driving. Safe and attractive sidewalks and walkways improve the walkability of the City. Citywide, sidewalks are generally provided on both sides of the streets. Additionally, standard paved trails and non-standard unpaved trails are frequently used by bicyclists and pedestrians in the City. Some trails are also available for equestrian riders. The existence of trails and sidewalks provides accessible facilities, provides safety features, and improves walkability in the City of Riverside. (GP 2025, p. CCM-29, CCM-30). Pedestrian corridor improvements are identified in areas within the City that lack sidewalks and good pedestrian connections and that could benefit from more frequent maintenance. (PACT, p. 4-62). Based on the *AT Plan Figure 4-12, Pedestrian Recommendations*, a linear recommendation is proposed within the Project vicinity, however not along the Project frontage.

## 5.12.2 Related Regulations

### Federal Regulations

No federal regulations are applicable to the Project with respect to transportation/traffic.

### State Regulations

#### *Complete Streets*

In 2008, the state passed the California Complete Streets Act Assembly Bill 1358 (AB 1358), requiring circulation elements to include a “Complete Streets” approach that balances the needs of all users of the street. Complete Streets are streets designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities. The precise definition of a Complete Street can vary depending on the context and primary roadway users, but there are some common elements found in successful Complete Streets policies. These policies consider the needs of all users of the street in the planning, design, construction, operation, and maintenance of transportation networks. This framework allows policymakers to shift the goals, priorities, and vision of local transportation planning efforts by emphasizing a diversity of modes and users.

#### *Senate Bill 375 - Sustainable Communities and Climate Protection Act*

The Sustainable Communities and Climate Protection Act, or Senate Bill 375 (SB 375), provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, helping to meet the statewide targets for reducing greenhouse gas emissions set by Assembly Bill 32. SB 375 requires each Metropolitan Planning Organization to add a broader vision for growth to its transportation plan through development of a Sustainable Communities Strategy (SCS). The SCS must lay out a plan to meet the region’s transportation, housing, economic, and environmental needs in a way that enables the area to lower greenhouse gas emissions. The SCS should integrate transportation, land use, and housing policies to plan for achievement of the emissions target for each region. The current sustainable community strategy for the City of Riverside is the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is known as *Connect SoCal*. (SB375)

In September 2020, the Southern California Association of Governments (SCAG) adopted Connect SoCal, which is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal was developed with input from local governments, county transportation commissioners, tribal governments, non-profit organizations, business, and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. (SCAG).

Connect SoCal includes population, housing, and employment growth projections for 2045. These growth projections are used in SCAG’s transportation modeling and shape SCAG’s regional planning efforts, as outlined in Connect SoCal. Connect SoCal minimizes increases in regional traffic congestion by focusing growth, density, and land use intensity within existing urbanized area as the general land use growth pattern for the region while enhancing the existing transportation system and integrating land use into transportation planning. Connect SoCal recommends local governments accommodate future growth within existing urbanized areas to reduce VMT, congestion, and greenhouse gas emissions. (SCAG)

#### *Vehicle Miles Traveled*

Senate Bill 743 (SB 743) was signed into law on September 27, 2013, and went into effect January 2014, seeking to balance the needs of congestion management, infill development, public health, greenhouse gas reductions, and other goals. The Governor's Office of Planning and Research (OPR) was directed to develop new criteria for determining significance of transportation impacts and define alternative metrics to traffic Level of Service (LOS) under CEQA. Specifically, SB 743 mandates that lead agencies can no longer use automobile delay – commonly known as LOS – as a method for conducting transportation analysis under CEQA. In December 2018, OPR released the Technical Advisory on Evaluating Transportation Impacts in CEQA, which set forth guidelines for the use of a broader measure called Vehicle Miles Traveled (VMT). VMT measures the total amount of driving over a given distance and is intended to better align transportation analysis with the State's Greenhouse Gas reduction goals. These changes became mandatory on July 1, 2020, and lead agencies are now required to analyze transportation impacts under VMT, not LOS.

#### *Congestion Management Program*

The Congestion Management Program (CMP) was first established in 1990 under Proposition 111. Proposition 111 established a process for each metropolitan county in California to designate a Congestion Management Agency (CMA) that would be responsible for development and implementation of the CMP within county boundaries. The intent of the CMP is to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality. Counties within California have developed CMPs with varying methods and strategies to meet the intent of the CMP legislation. The Riverside County Transportation Commission (RCTC) was designated as the CMA in 1990, and therefore, prepares the CMP updates in consultation with the Technical Advisory Committee (TAC), which consists of local agencies, the County of Riverside, transit agencies, and subregional agencies. (CMP)

### **Regional Regulations**

#### *County of Riverside Congestion Management Program*

RCTC is designated as the CMA to oversee the CMP. Urbanized areas such as Riverside County are required by State law to adopt a CMP. The goals of the CMP are to reduce traffic congestion and to provide a mechanism for coordinating land use development and transportation improvement decisions. Local agencies are required to establish minimum level of service (LOS) thresholds in their general plans and conduct traffic impact assessments on individual development projects. Deficiency plans must be prepared when a development project would cause LOS "F" on non-exempt CMP roadway segments.

#### *Western Riverside County Transportation Uniform Mitigation Fee*

In 2002, the jurisdictions of western Riverside County (including the City), agreed to participate in the Western Riverside County Transportation Uniform Mitigation Fee (TUMF) program. TUMF is a multi-jurisdictional impact fee program administered by the Western Riverside Council of Governments (WRCOG) that funds transportation improvements on a regional and sub-regional basis associated with new growth. All new development in each of the participating jurisdictions is subject to TUMF, based on the proposed intensity and type of development. (GP 2025, p. CCM-6).

TUMF fees are collected by the City from project applicants and are passed on to WRCOG as the ultimate program administrator. TUMF funds are distributed on a formula basis to the regional, local, and transit components of the program. Of the TUMF funds received by WRCOG, 3.13 percent is allocated to RTA for making regional transit improvements, 45.7 percent is allocated to RCTC for programming

improvements to the arterials of regional significance on the Regional System of Highways and Arterials, 1.47 percent is allocated to the Western Riverside County Regional Conservation Authority (RCA) to purchase habitat for the Multiple Species Habitat Conservation Plan (MSHCP), and 45.7 percent is allocated to the five zones for programming improvements to the Regional System of Highways and Arterials (RSHA) as determined by the respective zone committees. (WRCOG, p. 6).

The City participated in the preparation of the *Western Riverside County Transportation Uniform Fee Nexus Study* (dated October 18, 2002) and adopted TUMF fees based on that study. The City also participated in the preparation of an updated nexus study titled *Transportation Uniform Mitigation Fee Nexus Study: 2009 Update* and *Transportation Uniform Mitigation Fee Nexus Study: 2016 Update (2016 Nexus Study)*. The City adopted the 2016 Nexus Study and its findings through the approval of Ordinance 7393 §1. Fees owed to TUMF by the Project proponent will be based on the current fees when the certificate of occupancy is issued.

#### *Measure A (Riverside County Half-Cent Sales Tax)*

In November 1988, Riverside County voters approved Measure A, a one-half cent increase in sales tax over a 20-year period to be used for transportation purposes. Measure A included a “return to source” concept, which requires the additional sales tax revenue generated in a specific geographic area to be used to finance projects within that same area. In November 2002, Riverside County voters approved a 30-year extension of Measure “A” (2009-2039). Measure A funds go back to each of three geographic areas within Riverside County - Western Riverside County, Coachella Valley, and Palo Verde Valley - in proportion to the sales taxes they contribute. Each of the three geographic areas has its own transportation program.

## **Local Regulations**

### *City of Riverside 2025 General Plan*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project as identified below (GP 2025, pp. CCM-15 - CCM-18; CCM-22; CCM-27 – CCM-28; CCM-35 – CCM-36).

### ***Circulation Mobility Element***

- |                 |  |
|-----------------|--|
| Objective CCM-2 | Build and maintain a transportation system that combines a mix of transportation modes and transportation system management techniques, and that is designed to meet the needs of Riverside’s residents and businesses, while minimizing the transportation system’s impacts on air quality, the environment and adjacent development. |
| Policy CCM-2.2  | Balance the need for free traffic flow with economic realities and environmental and aesthetic considerations, such that streets are designed to handle normal traffic flows with tolerances to allow for potential short-term delays at peak-flow hours.  |
| Policy CCM-2.3  | Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.  |



- Policy CCM-2.4 Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles.
- Objective CCM-3 Design the Magnolia Avenue/Market Street Corridor as a transit- and pedestrian-oriented Mixed-Use boulevard.
- Policy CCM-3.2 Consider the implementation of off-street shared parking with parking signage improvements, consolidation of driveways, installation of raised landscaped medians, bus turnouts, traffic signal enhancements, special pavement treatments at pedestrian crossings and intersections, curb extensions, signalized/enhanced crosswalks, wider sidewalks, and other appropriate measures which enhance traffic flow, transit efficiency and pedestrian movements.
- Objective CCM-6 Cooperate in the implementation of regional and inter-jurisdictional transportation plans and improvements to the regional transportation system.
- Policy CCM-6.1 Encourage the reduction of vehicle miles, reduce the total number of daily peak hour vehicular trips, increase the vehicle occupancy rate, and provide better utilization of the circulation system through the development and implementation of TDM programs contained in the SCAQMD and County of Riverside TDM Guidelines.
- Objective CCM-9 Promote and support an efficient public multi-modal transportation network that connects activity centers in Riverside to each other and to the region.
- Policy CCM-9.1 Encourage increased use of public transportation and multi-modal transportation as means of reducing roadway congestion, air pollution and non-point source water pollution, through such techniques as directing new growth along transportation corridors.
- Policy CCM-9.6 Enhance and encourage the provision of attractive and appropriate transit amenities, including shaded bus stops, to facilitate use of public transportation, through the development process by incorporating the necessary design features as appropriate.
- Objective CCM-10 Provide an extensive and regionally linked public bicycle, pedestrian, and equestrian trails system.
- Policy CCM-10.3 Provide properly designed pedestrian facilities for the disabled and senior population to ensure their safety and enhanced mobility as users of streets, roads and highways emphasizing “complete streets” principles.
- Policy CCM-10.6 Encourage pedestrian travel through the creation of sidewalks and street crossings.
- Policy CCM-10.12 Encourage bicycling as a commute mode to school, work, etc.

Objective CCM-12	Facilitate goods movement as a means of economic expansion, while protecting residents and visitors from the negative effects typically associated with truck operations and rail service.
Policy CCM 12.2	Ensure that new development projects provide adequate truck loading and unloading facilities.
Objective CCM-13	Ensure that adequate on- and off-street parking is provided throughout Riverside.
Policy CCM-13.1	Ensure that new development provides adequate parking.

*City of Riverside 2025 General Plan EIR*

There are no applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to traffic and circulation.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.

*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUI EIR that pertain to Traffic and Transportation.

*City of Riverside Municipal Code*

The following chapter of the City's Municipal Code are applicable and pertain to traffic and transportation:

**Chapter 16.64 – Traffic Signal and Railroad Signal Mitigation Fees and Transportation Impact**

**Fees.** The City Council hereby finds and determines that new private development in the City of Riverside increases the amount of traffic utilizing the City street system thereby requiring the installation of additional traffic signals, railroad signals including crossing gates and associated work, and street improvements at specified locations to increase or improve transportation capacity, in order to protect the public health, safety and welfare and that such private new development should pay its fair share of such improvements

This local development impact fee (DIF) is comprised of two fees: First, it is to provide for the imposition of fees on each new nonresidential unit, residential dwelling unit and mobile home space, which fees are to be placed in a specially-designed fund to be utilized for the purchase and installation of traffic signals and railroad signals including crossing gates and other protective devices and all costs associated with railroad crossing protection. Secondly, it is to provide for the imposition of fees on each new residential dwelling unit and mobile home space, which fees are to be placed in a specially-designated fund to be utilized for improvements to streets as designated by the City Council in order to increase or improve the carrying capacity of such streets to solve current and proposed traffic congestion.

**Chapter 16.68 – Traffic Signal and Railroad Signal Mitigation Fees and Transportation Impact**

**Fees.** The purpose of this chapter is to establish TUMF to fund certain improvements to the Regional System as identified in the Riverside County 2016 Nexus Study. Fees are required to be paid at the time a certificate of occupancy is issued for a Development Project or upon final inspection, whichever comes first. The fees are calculated according to fee schedule set forth in this chapter and the

calculation methodology set forth in the Fee Calculation Handbook adopted July 14, 2003, as amended from time to time.

#### *Neighborhood Traffic Management Program*

As traffic volumes and congestion have increased on the major regional roadways, drivers looking to reduce their travel times begin to look at alternative routes using the local street system to avoid problem areas. This neighborhood intrusion by “cut-through” traffic has become a growing concern for some residential areas. The City has an active Neighborhood Traffic Management Program to minimize and/or prevent intrusion of regional cut-through traffic into residential neighborhoods through traffic management and traffic calming strategies, and to improve the livability of neighborhoods through controlling the impacts of outside traffic. The strategies include speed control methods, parking restrictions, speed humps, pedestrian safety improvements, and sight obstruction elimination. (GP 2025, p. CCM-22).

### **5.12.3 Comments Received in Response to the Notice of Preparation**

Two comment letters were received related to Traffic and Transportation in response to the Notice of Preparation (NOP). The comment letters were received from Beverly Phillips and the Inland Empire Biking Alliance and are included in Appendix A of this Draft EIR.

### **5.12.4 Thresholds of Significance**

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G (“Environmental Checklist”) to the State *CEQA Guidelines*.

As identified in the Initial Study (Appendix A) prepared for this Project, and as outlined in Section 4.0 of this DEIR, implementation of the proposed Project will have a less than significant impacts in the following areas and these topics are not addressed in this DEIR:

- Substantially increase hazards due to a geometric design feature (e.g., share curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and
- Result in inadequate emergency access.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; and
- Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

### **5.12.5 Project Design Features**

The proposed Project site will leave in place four of the six existing full access driveways: two along Arlington Avenue and two along Streeter Avenue. Primary site access for the residential area will be from Streeter Avenue with secondary access from Arlington Avenue. Primary access for the commercial area will be from Arlington Avenue with secondary access from Streeter Avenue. The following lists the proposed improvements and is reflected in **Figure 3.0-31** in Section 3.0 – Project Description of this Draft EIR:

### Driveway and Roadways

- Driveway #1 - Streeter Avenue and Granada Avenue Intersection
  - Install a stop control on the westbound approach (the Project driveway) and construct a westbound shared left-through-right turn lane.
- Driveway #2 - Streeter Avenue and El Molino Avenue Intersection
  - Install a stop control on the westbound approach (the Project driveway) and construct a westbound shared left-through-right turn lane and modify the existing median to provide 225-feet of storage for the southbound left turn lane.
- Driveway #3 - California Avenue and Arlington Avenue Intersection
  - Install a stop control on the southbound approach (the Project driveway), construct a southbound right turn lane and construct a westbound right turn lane.
- Driveway #4 - Along Arlington Avenue
  - Construct a shared left-through-right turn lane on the southbound approach (the Project driveway), construct a westbound right turn lane, improve the existing traffic signal infrastructure with Audible Push Buttons, install a new traffic signal pole on the north leg, widen Project driveway (north leg of intersection), relocate the existing traffic signal pole located on the north leg to accommodate new drive aisle width and sidewalk/curb-and-gutter locations, and modify existing raised median to provide 150-foot eastbound left turn pocket.
- Streeter Avenue and Arlington Avenue Intersection
  - Improve the existing traffic signal infrastructure with Audible Push Buttons, cut back medians on the north, east, and west legs to allow for a clear travel path for pedestrians at all approaches and purchase a new traffic signal controller for this intersection.
- Streeter Avenue from southern Project boundary to northern Project boundary
  - Improve curb and gutter, sidewalk, and landscaping as necessary for site access and consistent with City standards.
- Arlington Avenue from western Project boundary to eastern Project boundary
  - Dedicate 5-feet of pavement from the existing curb-and gutter (60-feet from centerline to edge of ROW) on Arlington Avenue and improve curb and gutter, sidewalk, and landscaping as necessary for site access and consistent with City standards.
- California Avenue, Streeter Avenue, and Arlington Avenue
  - Modify the traffic signal to implement a 130-second cycle.

### Bikeways

- Streeter Avenue
  - From Central Avenue to Arlington – stripe a Class II bike lane.
  - Streeter Avenue/Granada Avenue Intersection – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.
  - Streeter Avenue/Sierra Street South – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.
  - Streeter Avenue/Sierra Street North – stripe a northbound and southbound Class II bike lane on the east and west sides of Streeter Avenue.

## 5.12.6 Methodology

The analysis herein is based in part on the *Traffic Impact Analysis (TIA)* and *Vehicle Miles Traveled Screening Memorandum (VMT Memo)*. Both studies were prepared consistent with the requirements of



SB 743 and the City of Riverside’s Public Works Department Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled (VMT) and Level of Service (LOS) Assessment (dated July 2020). (TIA).

CEQA Guidelines Section 15064.3 requires that the determination of significance for transportation impacts be based on VMT instead of a congestion metric such as LOS. The change in the focus of transportation analysis is the result of SB 743, as outlined in Section 5.12.2 - Related Regulations, above. Thus, the analysis below does not consider LOS within the impact determination.

*Traffic Impact Analysis*

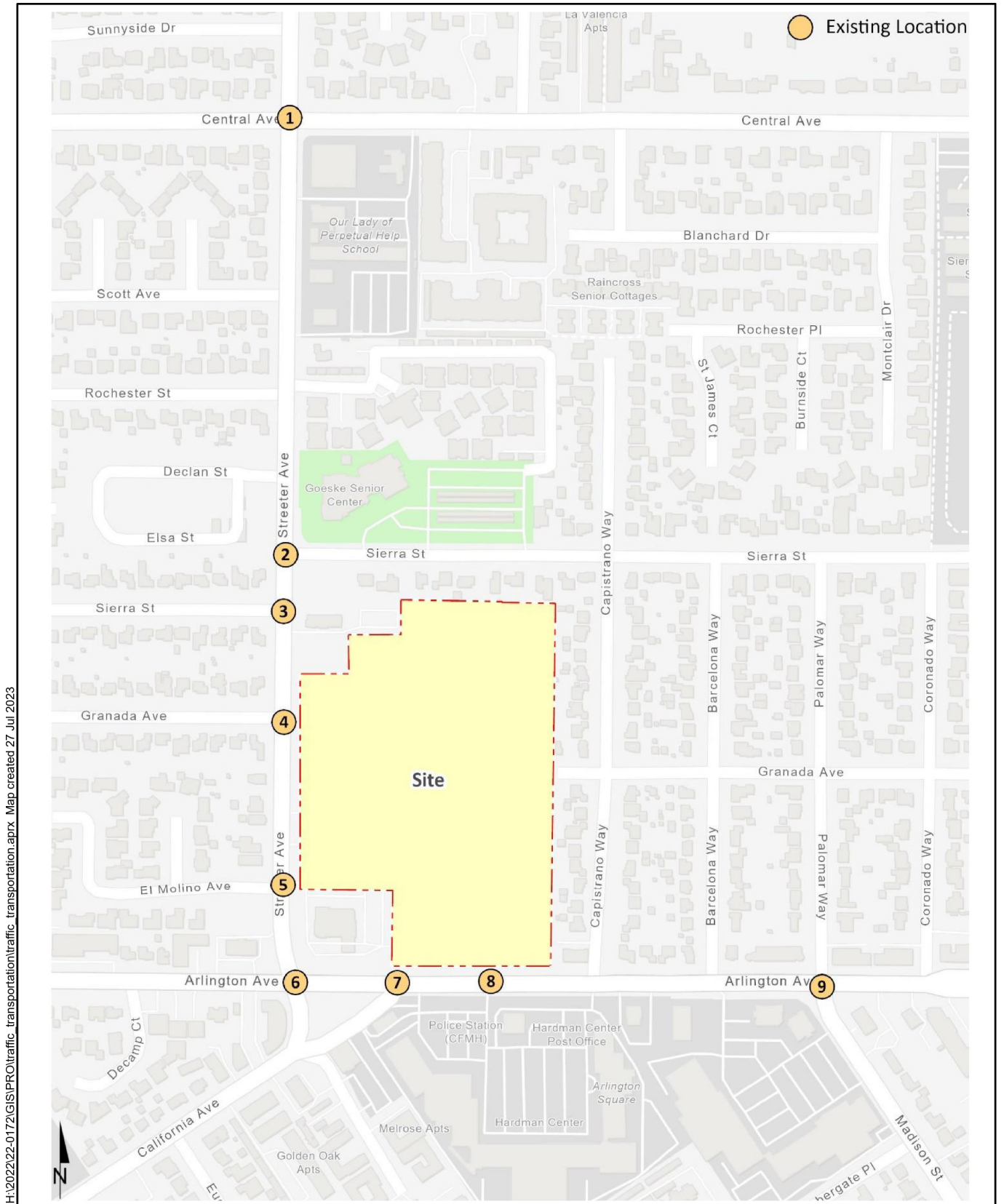
A traffic scoping package was provided for review by City staff prior to preparation of the TIA and provided an outline of the Project study area, trip generation, trip distribution, and analysis methodology. The TIA was prepared to evaluate the mix of land uses proposed by the Project to determine potential for traffic related impacts and improvements required by the Project. The following specifications were evaluated: 388 multifamily residential dwelling units, 21,000 square feet of grocery store and a stand-alone 5,000 square foot multi-tenant building. Trips generated by the Project’s proposed land uses have been estimated based on trip generation rates collected by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, 2021. The TIA evaluated how the proposed transportation network improvement and GP goals and policies would serve to improve transportation conditions under project buildout. (URBAN, p. 1).

Study Area

**Table 5.12-A, Study Area Intersections** identifies the location of the study area intersections analyzed by the TIA. All intersections are located within the jurisdiction of the City and none are CMP facilities. The Project study area and corresponding intersection identification is reflected in **Figure 5.12-2, Project Study Area**.

**Table 5.12-A, Project Study Area**

<b>Intersection ID</b>	<b>Location</b>
1	Streeter Avenue and Central Avenue
2	Streeter Avenue and Sierra Street North
3	Streeter Avenue and Sierra Street South
4	Driveway #1 Streeter Avenue and Granada Avenue
5	Driveway #2 Streeter Avenue and El Molino Avenue
6	Streeter Avenue and Arlington Avenue
7	Driveway #3 California Avenue and Arlington Avenue
8	Driveway #4 and Arlington Avenue
9	Madison Street/Palomar Way and Arlington Avenue
Source: URBAN, Table 1-1: Intersection Analysis Locations	



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Source: Traffic Analysis Dec. 23, 2022.

**Figure 5.12-2 Study Area Intersections**

NTS

Arlington Mixed Use



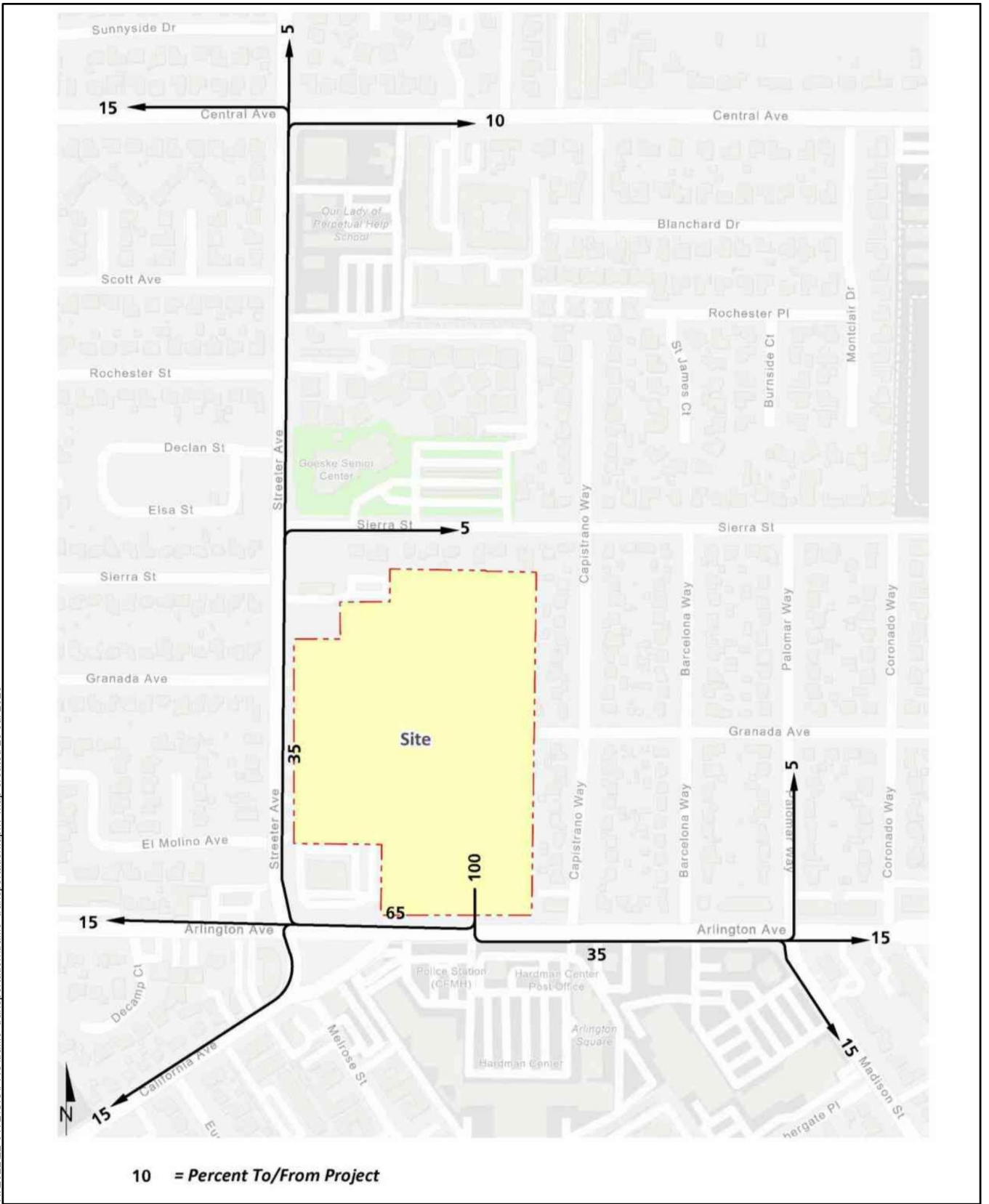
Trip Distribution

The Project trip distribution represents the directional orientation of traffic to and from the Project site. Trip distribution is the process of identifying the probable destinations, directions or traffic routes that will be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered to identify the route where the Project traffic would distribute. The Project trip distribution was developed based on anticipated travel patterns to and from the Project site and are consistent with other similar projects that have been reviewed and approved by City of Riverside staff. The proposed Project trip distribution is reflected in **Figure 5.12-3, Project (Retail) Trip Distribution** and **5.12-4, Project (Residential) Trip Distribution**. Each of these distribution patterns was reviewed and approved by the City of Riverside as part of the traffic study scoping process. (URBAN, p. 33).

Traffic Projections

Future year traffic forecasts have been accounted for, for the proposed Project's anticipated opening year of 2028. The total ambient growth for 2028 conditions is 12.62 percent based upon background (ambient) growth at 2.0 percent per year, compounded over 6 years. The ambient growth factor is intended to approximate regional traffic growth. This ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects. Ambient growth has been added to daily and peak hour traffic volumes on surrounding roadways, in addition to traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies. The traffic generated by the proposed Project was manually added to the base volume to determine Opening Year Cumulative "With Project" forecast conditions. To provide the most conservative analysis, traffic generated by other known or probable related projects was added to the estimated area ambient traffic growth. These related projects are at least in part already accounted for in the assumed ambient growth rates; and some of these related projects may not be implemented and operational within the 2028 Opening Year time frame assumed for the Project.

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Source: Traffic Analysis Dec. 23, 2022.

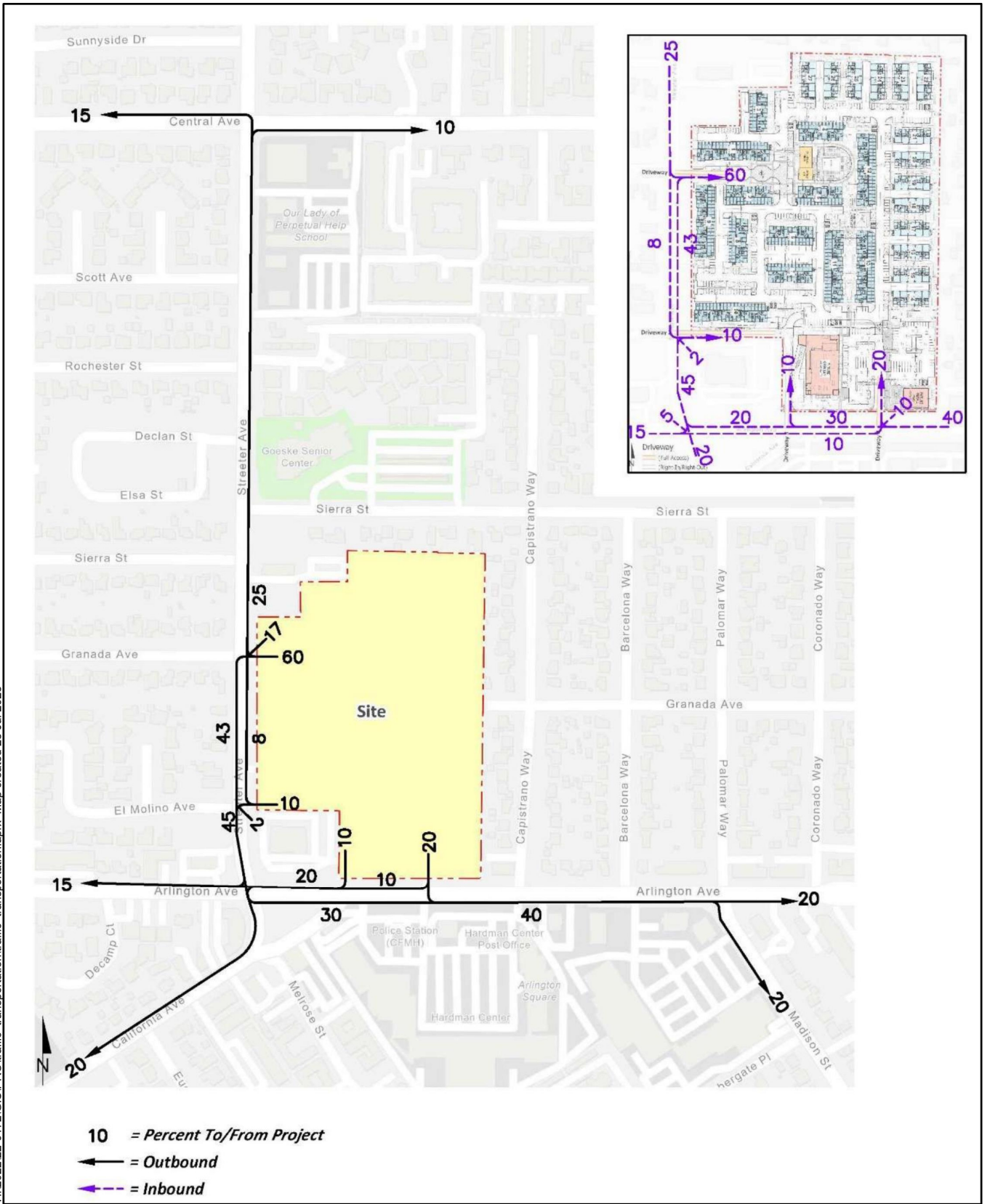
**Figure 5.12-3 Project (Retail) Trip Distribution**

Arlington Mixed Use

NTS



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**Figure 5.12-4 Project (Residential) Trip Distribution**

NTS

Arlington Mixed Use

### *Vehicle Miles Traveled*

The VMT Memo was prepared to analyze the Project's potential effect on and ability to reduce VMT. The City's Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (2020) include the following criteria to screen for projects that are presumed to have a less-than-significant effect on VMT and were used in the analysis discussion below to determine CEQA impacts:

#### 1. Transit Priority Area (TPA) Screening

Projects located with a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary. This presumption may NOT be appropriate if the project:

- a) Has a Floor Area Ratio (FAR) of less than 0.75;
- b) Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- c) Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City), with input from the Metropolitan Planning Organization); or
- d) Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

A TPA is defined as a half mile area around an existing major transit stop or an existing stop along a high quality transit corridor per the definitions below.

- Pub. Resources Code, § 21064.3 - 'Major transit stop' means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- Pub. Resources Code, § 21155 - For purposes of this section, a 'high-quality transit corridor' means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

#### 2. Low VMT Area Screening

Residential and office projects located within a low VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident or per worker that is similar to the existing land uses in the low VMT area—provided the VMT of the area falls below thresholds.

For this screening in the WRCOG area, the Riverside County Transportation Model (RIVCOM) travel forecasting model was used to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs). TAZs are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior. Daily VMT per capita was estimated for each TAZ. This presumption may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

#### 3. Project Type Screening

Local serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally

improves the convenience of shopping close to home and has the effect of reducing vehicle travel.

4. Mixed-Use Projects

To identify if the proposed project requires a VMT analysis, the City of Riverside may evaluate each component of a mixed-use project independently and apply the significance threshold for each project type included (e.g. residential and retail).

5. Redevelopment Projects

Where a project replaces existing VMT generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to less than significant transportation impact. If the project leads to a net overall increase in VMT, then the thresholds described above should apply.

### 5.12.7 Environmental Impacts

***Threshold : Would the Project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

#### **Public transit, bicycles, and pedestrian facilities**

The City's 2025 General Plan - Circulation and Community Mobility Element introduces and implements various strategies and approaches to accommodate, improve, enhance, and maintain multiple modes of travel (vehicular and non-vehicular) throughout the City. Mode choice is influenced by sidewalk connectivity and proximity of buildings, bike accommodations, transit stop density and service characteristics, and availability of interconnected low speed routes. Non-vehicular transportation includes pedestrians (sidewalks), bicycles (on-road lanes or off-road paths), bus transit, and train transit.

The City's 2025 GP Objective CCM-2 promotes and supports modes of transportation that offer an alternative to single-occupancy automobile use and help reduce air pollution and road congestion. Emphasizing non-vehicular transportation is a key element of SB 375 and SCAG's Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). (GP 2025, p. CCM-15).

Although there are no current or proposed trails near the Project Site, there are existing sidewalks adjacent to the Project site, along both Arlington Avenue and Streeter Avenue. Pedestrian circulation within the Project site is reflected in **Figure 3.0-32** in Section 3.0 – Project Description of this Draft EIR. The Project will provide several pedestrian pathways to facilitate the movement of pedestrians within the site. These pathways will be lit to ensure security. The Project site will also provide pedestrian linkage to the surrounding area by providing connection to sidewalks along Streeter Avenue and Arlington Avenue. The Project will remove the existing sidewalks to incorporate a landscape buffer between the roadway and sidewalks. The sidewalks will continue to connect to the existing sidewalks in the area and continue to provide pedestrian linkage beyond the boundaries of the Project site. As such the Project would facilitate and would not obstruct City goals and policies to provide efficient and safe pedestrian access and no impacts to pedestrian facilities would occur.

As part of the City's Bikeway Network, Class II bike lanes exist along Arlington Avenue which connect to the Magnolia/Market Corridor. The PACT Plan designates Streeter Avenue as a Class II Buffered Bike Lane, however it is not currently striped as such. The Project will stripe Class II bike lane on the east and west sides of Streeter Avenue, as identified in Section 5.12.5 – Project Design Features, above.

With respect to bicycle and pedestrian safety, the Project is required to comply with all design guidelines and regulations to ensure facilities meet City's current standards. The City has prepared a *2022 Local Roadway Safety Plan* (LRSP). The goal of the City and their safety partners through the LRSP, is to provide safe, sustainable, and efficient mobility choices for their residents and visitors. Through the development and implementation of the LRSP, the City continues its collaboration with safety partners to identify and discuss safety issues within the community and the LRSP identifies a framework to identify, analyze, and develop traffic safety enhancements on the City's roadway network. (LRSP, pp. ES-7, 1). The Project will incorporate all bike lane improvements outlined in Section 5.12.5 – Project Design Features above, in accordance with all City standards.

As mentioned in Section 5.12.1 – Setting the Project is currently served by the RTA. Bus Route 12 and Bus Route 15 that travel along Streeter Avenue and Arlington Avenue, respectively, in the Project area. The nearest bus stops and shelters are located on Arlington Avenue and Streeter Avenue. The shelter along Arlington Avenue is situated in front of the location of the proposed ALDI. The bus shelter along Streeter Avenue is along the easterly side of Streeter near Streeter Avenue/ Arlington Avenue. The existing bus services would continue to serve the Project site and the future residents and retail patrons would have convenient access to transit. Furthermore, it should be noted that Route 15 provides connections to both the Riverside-Downtown Metrolink Station and the La Sierra Metrolink Station which allows for connections to adjacent communities. The proposed Project would not alter or conflict with existing bus stops and schedules, and impacts related to RTA transit services would not occur.

#### **Vehicular Circulation**

The City's 2025 GP Policy CCM-2.3 requires Arterial Streets to maintain an LOS D or better. This policy also provides that at key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, an LOS E at peak hours is acceptable on a case-by-case basis. The Project TIA provided a conservative trip generation analysis by evaluating a worst-case scenario by utilizing a slightly higher commercial square footage than proposed by the Project. The TIA calculated existing trip generation counts as if the Project site were not vacant and still being utilized as its previous use Under the existing land use, a total of 4,698 vehicular trips with 119 AM peak hour trips and 400 PM peak hour trips would result. Since the site has been vacant since approximately 2020, no trip credits were taken into account as part of this calculation. The proposed Project is estimated to generate 3,372 two-way trip-ends per day on a typical weekday with 229 AM peak hour trips and 284 PM peak hour trips; 1,326 fewer trips than the previous use.(URBAN, p. 1)

In 2013, the State of California passed Senate Bill (SB) 743, which mandates that lead agencies can no longer use automobile delay, commonly known as Level of Service (LOS), as a method for conducting transportation analysis under CEQA. The State later issued guidelines for the use of a broader measure called Vehicle Miles Traveled (VMT), which measures the total amount of driving over a given distance and is intended to better align transportation analysis with the State's Greenhouse Gas reduction goals. These changes became mandatory on July 1, 2020, and lead agencies are now required to analyze transportation impacts under VMT, not LOS. Therefore, the LOS data and the relationship of the Project's effect on LOS with General Plan goals concerning LOS are reported for informational purposes and utilized by the City in considering General Plan consistency, but are not used to gauge environmental impacts in this Draft EIR.

As reflected in **Table 5.12-B, Level of Service (LOS) - Existing and Existing Plus Project (Opening Year 2028)** below, with incorporation of improvements listed in Section 5.12.5 – Project Design Features, the proposed Project is not anticipated to result in new LOS deficiencies(URBAN, p. 50).



**Table 5.12-B, Level of Service (LOS) – Existing and Existing Plus Project (Opening Year 2028)**

ID/Intersection	Existing		Opening Year Without Project		Opening Year With Project	
	AM	PM	AM	PM	AM	PM
1. Streeter Avenue and Central Avenue	C	C	D	C	D	C
2. Streeter Avenue and Sierra Street North	A	A	A	A	A	A
3. Streeter Avenue and Sierra Street South	B	B	B	B	B	B
4. Driveway #1 Streeter Avenue and Granada Avenue	B	B	C	B	C	C
5. Driveway #2 Streeter Avenue and El Molino Avenue	C	B	C	C	C	C
6. Streeter Avenue and Arlington Avenue	C	C	D	D	D	D
7. Driveway #3 California Avenue and Arlington Avenue	C	C	D	C	D	C
8. Driveway #4 and Arlington Avenue	B	B	B	B	B	B
9. Madison Street/Palomar Way and Arlington Avenue	B	B	B	B	C	B
Source: URBAN, Table 3-1, Table 5-1						

Further, the proposed Project will be required to install traffic signing and striping in accordance with California Manual on Uniform Traffic Control Devices in conjunction with detailed Project construction plans. Sight distance at each access point will be required to be reviewed with respect to standard CalTrans and City of Riverside sight distance standards at the time of preparation of final grading, landscape, and street improvement plans.

With incorporation of the Project’s proposed improvements (PDFs), implementation of the recommended optimizing signal phasing improvements, payment of City Developer Impact Fees (DIF), and payment of regional County Traffic Uniform Mitigation Fee (TUMF) to offset traffic related deficiencies, all intersections are expected to operate at a satisfactory LOS. As such, the Project complies with General Plan policies as they relate to LOS. No additional improvements are required.

**Program Plans**

*Congestion Management Program (CMP) and the Long-Range Transportation Study (LRTS)*

The CMP is a component of the RCTC’s Long Range Transportation Study (LRTS), the first countywide long range transportation study that identifies and evaluates highway, major roadway, and transit projects throughout the Riverside County region. The LRTS identified four roadway improvement projects within the City of Riverside to reduce traffic congestion:

- the Main Street and 60 Interchange project;
- the Tyler Street and 91 Interchange project;
- the Adams Street and 91 Interchange project; and

- the Arlington Avenue from Magnolia Avenue to Alessandro Boulevard project. (LRTS, Appendix A)

The proposed Project would not affect the ability of these improvement projects in the City to be constructed. The Project would ultimately benefit from these roadway improvement projects identified in the CMP. Hence, the Project would not conflict with the RCTC's CMP.

#### *Connect SoCal*

As discussed in Section 6.0 – Consistency with Regional Plans, the Plan is consistent with the goals of *Connect SoCal*. Hence, the Project would not conflict with this program plan.

Thus, because the proposed Project's vehicular and non-vehicular network will be designed and constructed in compliance with all applicable regulations, will implement PDFs and improvements consistent with City requirements, and is consistent with GP policies and all applicable program plans, the Project will not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be **less than significant**.

#### ***Threshold: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

The VMT memo utilized the five screening criteria outlined in the City's TIA Guidelines for VMT and LOS Assessment to determine the Project's impact.

1. Based on WRCOG tool, the Project is located within traffic analysis zone (TAZ) 2022 which is located within a designated TPA. While the Project is located in a TPA, provides no more parking than is required, does not replace affordable housing, and will be required to comply with the SCS, it also has a proposed floor to area ratio (FAR) of 0.6, which is less than 0.75. Thus, this criterion is not met.
2. Based on WRCOG tool, the Project is located within TAZ 2022 which is located within a low VMT generating area. Therefore, this criterion is met.
3. The residential portion of the project would not be considered local-serving due to its size (over 16 townhomes). However, based on the square footage of the proposed commercial area and its potential to serve the local community, it is considered local serving. Thus, the Project meets the criterion through the proposed retail.
4. Per the City's guidelines, the Project is analyzed separately for residential and retail portions for Criterion 2 and Criterion 3.
5. While the project is proposing to replace the existing Sears store, due to its land use and size, it is not expected to generate less VMT than the previous use so the criterion is not met.

In accordance with the City of Riverside Guidelines screening criteria, the proposed Project is presumed to have a less than significant transportation impact and is screened out from further VMT analysis based on the Project being within a low VMT-generating area. Further, the retail portion of the Project meets the criteria for screening from further VMT analysis because it is under 50,000 square feet so is considered a local-serving project. (WEBB-C, p. 3, 4).

Thus, because the Project is considered to be within a low VMT-generating area and considered a local-serving project, it is consistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, impacts would be **less than significant**.

### **5.12.8 Recommended Mitigation Measures**

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). There are no mitigation measures required to reduce impacts to less than significant impacts to transportation are anticipated from implementation of the Project. Therefore, no mitigation measures are required.

### **5.12.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

The Project does not result in any significant impact to transportation, and no mitigation is required.

## 5.13 Tribal Cultural Resources

The focus of this section is to analyze potential impacts related to tribal cultural resources. The following discussion addresses the potential for adverse impacts that could result from the construction and operation as a result of the Project. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics.

Cultural resources include places, objects, and settlements that reflect group or individual religious, archaeological, architectural, or paleontological activities. By statute, “tribal cultural resources,” are generally described as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are further defined in PRC Section 21074(a)(1)(A)–(B). Tribal cultural resources are generally described as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are further defined in PRC Section 21074(a)(1)(A)–(B).

The Project was analyzed for cultural resources in the *Cultural Resources Technical Report for 5261 Arlington Avenue, Riverside, California*, prepared by Dudek dated May 2023 (DUDEK-A). A *Supplemental CHRIS Records Search Results* was prepared by Dudek dated October 2023 (DUDEK-B) which includes the off-site utility line. The Project in its entirety (including one parcel and offsite improvement areas) is referred to as “Project site”, whereas reference to the one parcel (APN 226-180-015) referred to as “Project parcel”. (DUDEK-A, p.3). These reports are attached as Appendix C of this Draft EIR.

### 5.13.1 Setting

The Project is located in a fully developed area surrounded by residential and commercial businesses within the City of Riverside, California.

#### Ethnographic Setting

The history of the Native American communities prior to the mid-1700s largely relies on later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants, missionaries, military personnel, and explorers. Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon state border at the time of Spanish contact. The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families. The tribes of this area have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztecan family. These groups include the Gabrielino, Cahuilla, and Serrano. Based on the amount of internal diversity within these language-speaking communities it is believed to reflect a time depth of approximately 2,000 years. Other researchers have contended that Takic may have diverged from Uto–Aztecan ca. 2600 BC–AD 1, which was later followed by the diversification within the Takic speaking tribes, occurring approximately 1500 BC–AD 1000 (DUDEK-A, pp. 43-44).

#### *Gabrielino (Gabrieleño)/Tongva*

The archaeological record indicates that the Gabrielino arrived in the Los Angeles Basin around 500 B.C. Surrounding native groups included the Chumash and Tataviam to the northwest, the Serrano and Cahuilla to the northeast, and the Juaneño and Luiseño to the southeast. While names by which Native Americans identified themselves have been lost and replaced by Spanish people from local Missions. The



name “Gabrielino” was first established by the Spanish from the San Gabriel Mission and included people from the established Gabrielino area as well as other social groups. (DUDEK-A, p. 44).

The Tongva established large, permanent villages along rivers and streams, and lived in sheltered areas along the coast. Tongva lands included the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina and stretched from the foothills of the San Gabriel Mountains to the Pacific Ocean. The tribal population has been estimated to be at least 5,000, but recent Ethnohistoric work suggests a much larger population of about 10,000. Archaeological sites composed of villages with various sized structures have been identified through the Los Angeles Basin. The largest, and best documented, ethnographic Tongva village in the Gabrieleño territory was likely that of Yanga which was in the vicinity of downtown Los Angeles. (DUDEK-A, pp. 44-45).

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most native Californians, acorns were the staple food. Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Fresh water and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed. (DUDEK-A, p. 45).

Tools and implements used by the Tongva to gather and collect food resources included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Trade between the mainland and the Channel Islands Groups was conducted using plank canoes as well as tule balsa canoes. These canoes were also used for general fishing and travel. The collected food resources were processed food with hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Catalina Island steatite was used to make ollas and cooking vessels. (DUDEK-A, p. 45).

#### *Cahuilla*

The name “Cahuilla” is possibly derived from a native word meaning “master, boss”. It is believed that the Cahuilla migrated to southern California about 2,000 to 3,000 years ago, most likely from southern Sierra Nevada ranges of east-central California with other related socio-linguistic groups (i.e. the Takiic speakers). The Cahuilla then settled in a territory that extended west to east from the present-day City of Riverside to the central portion of the Salton Sea in the Colorado Desert, and south to north from Lake Elsinore to the San Bernardino Mountains. While 60 percent of Cahuilla territory was located in the Lower Sonoran Desert environment, 75 percent of their diet from plant resources was acquired in the Upper Sonoran and Transition environmental zones. (DUDEK-A, p. 46).

The Cahuilla had three primary levels of socio-political organization. The highest level was the cultural nationality, encompassing everyone speaking a common language. Next were the two patrimoieties of the Wildcats (tuktum) and the Coyotes (‘istam). Every clan of the Cahuilla fell into one or the other of these moieties. The third basic level consisted of the numerous political-ritual-corporate units called sibs, or patrilineal clans. (DUDEK-A, p. 46).

Cahuilla villages were usually located in canyons or on alluvial fans near a source of accessible water, such as springs or where large wells could be dug. A wide variety of tools and implements were employed by the Cahuilla to gather and collect food resources. For the hunt, these included the bow and arrow, traps, nets, slings and blinds for hunting land mammals and birds, and nets for fish in Holocene-epoch Lake Cahuilla. Rabbits and hares were commonly taken with the throwing stick, but communal hunts for these animals utilized tremendously large nets and clubs for mass-capture. Foods were

processed with a variety of tools, including portable stone mortars, bedrock mortars and pestles, basket hopper mortars, manos and metates, bedrock grinding slicks, hammerstones and anvils, woven strainers and winnowers, leaching baskets and bowls, woven parching trays, knives, bone saws, and wooden drying racks. Food was consumed from a number of woven and carved wood vessels and pottery vessels. The ground meal and unprocessed hard seeds were stored in large finely woven baskets, and the unprocessed mesquite beans were stored in large granaries woven of willow branches and raised off the ground on platforms to keep it from vermin. Pottery vessels were made by the Cahuilla, and also traded from the Yuman-speaking groups across the Colorado River and to the south. (DUDEK-A, p. 46).

## 5.13.2 Related Regulations

### Federal Regulations

#### *National Historic Preservation Act*

The National Historic Preservation Act of 1966 (NHPA) (54 U.S.C. 300101 et seq.) is legislation intended to preserve historical and archaeological sites in the United States of America. The act created the National Register of Historic Places, the list of National Historic Landmarks, and the State Historic Preservation Offices (SHPO). Among other things, the act requires federal agencies to evaluate the impact of all federally funded or permitted projects on historic properties (buildings, archaeological sites, etc.) through a process known as “Section 106 Review.” (NPS-A).

#### *National Register of Historic Places*

Developed in 1981 pursuant to Title 36 CFR Section 60, the NRHP provides an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment. It should be noted that the listing of a private property on the NRHP does not prohibit any actions which may otherwise be taken by the property owner with respect to the property. The listing of sites in California to the National Register is initiated through an application submitted to the State Office of Historical Preservation. Applications deemed suitable for potential consideration are handled by the State Historic Preservation Officer. All NRHP listings for sites in California are also automatically added to the California Register of Historical Resources by the State of California. The listing of a site on the NRHP does not generally result in any specific physical protection. Among other things, however, it does create an additional level of CEQA (and NEPA, the National Environmental Protection Act) review to be satisfied prior to the approval of any discretionary action occurring that might adversely affect the resource. (NPS-B).

#### *American Indian Religious Freedom Act*

This American Indian Religious Freedom Act became law in 1978 (Public Law 95-341, 42 USC 1996) in order to protect and preserve for American Indians their inherent right of freedom to believe, express and exercise their traditional religions. These religious rights extend to, but are not limited to, access to sites, use and possession of sacred objects and the freedom to worship through ceremonials and traditional rites. Under this regulation, federal agencies and departments are charged with evaluating their policies and procedures in consultation with native traditional religious leaders in order to eliminate interference with the free exercise of native religion. Agencies must determine and make appropriate changes necessary to protect and preserve Native American religious cultural rights and practices, and to accommodate access to and use of religious sites “to the extent that the use is practicable and not inconsistent with an agency’s essential functions.” The intent is to protect Native Americans’ First Amendment right to “free exercise” of religion. (AIRFA).

*Native American Graves Protection and Repatriation Act*

Enacted in 1990 under Title 25 U.S. Section 3001, the Native American Graves Protection and Repatriation Act (NAGPRA) describes the rights of Native American lineal descendants, Indian Tribes, and Native Hawaiian organizations with respect to treatment, repatriation, and disposition of Native American cultural items for which they can show a relationship of lineal descent or cultural affiliation. The statute also requires federal agencies and museums receiving federal funds to inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items. In an attempt to recognize the religious and cultural significance of such sites and to protect their sacred integrity, it also provides for greater protection of Native American burial sites and more careful control over the removal of Native American human remains, funerary objects, sacred objects, and items of cultural patrimony on federal and tribal lands. Federal curation regulations are also provided in 36 Code of Federal Regulations 79, which apply to collections that are excavated or removed under the authority of the Antiquities Act (16 United States Code [USC] 431-433), the Reservoir Salvage Act (16 USC 469-469c), Section 110 of the NHPA (16 USC 470h-2), or the Archaeological Resources Protection Act (16 USC 470aa-mm). Such collections generally include those that are the result of a prehistoric or historic resources survey, excavation or other study conducted in connection with a federal action, assistance, license, or permit. (NPS-C).

**State Regulations**

***California Environmental Quality Act***

The California Environmental Quality Act (CEQA) requires the lead agency to determine whether the proposed development project will have a significant effect on the environment. Sections 21083.2 and 21084.1 of the State *CEQA Guidelines* deal with the definitions of unique and non-unique archaeological resources and historical resources, respectively. Section 21083.2 directs the lead agency to determine whether the project may have a significant effect on unique archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources. Section 21084.1 directs the lead agency to determine whether the project may have a significant effect on historical resources, irrespective of the fact that these historical resources may not be listed or determined to be eligible for listing in the California Register of Historical Resources (CRHR), a local register of historical resources, or they are not deemed significant pursuant to criteria set forth in California Public Resource Code (PRC) Section 5024.1(g). A cultural resource is considered “historically significant” under Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852, if it meets any one of the following criteria for:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A tribal cultural resource may be considered significant if it is included in a local or state register of historical resources or determined by the lead agency to be significant pursuant to criteria set forth in PRC Section 5024.1; is a geographically defined cultural landscape that meets one or more of these criteria; or is a historical resource described in PRC Section 21084.1, a unique archaeological resource

described in PRC Section 21083.2, or a non-unique archaeological resource if it conforms with the above criteria. (CRHR).

#### *State Historic Preservation Office*

The State Historic Preservation Office (SHPO) is a state governmental function created per the NHPA, which called for the creation of a state agency to implement provisions of the law, including the preparation of a comprehensive historic preservation plan and a statewide survey of historical resources (SHPO-A). SHPO administers the National Register of Historic Places, the California Register of Historical Resources, the California Historical Landmarks, and the California Points of Historical Interest programs. The responsibilities of the SHPO include identifying, evaluating, and registering historic properties; ensuring compliance with federal and state regulatory obligations; encouraging the adoption of economic incentives programs designed to benefit property owners; encouraging economic revitalization by promoting a historic preservation ethic through preservation education and public awareness and, most significantly, by demonstrating leadership and stewardship for historic preservation in California. SHPO maintains the California Historical Resources Information System (CHRIS), which includes the statewide Historical Resources Inventory database. (SHPO-B).

#### *California Register of Historical Resources (Public Resource Code Section 5024.10 et seq.)*

State law protects cultural resources by requiring evaluations of the significance of historical resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a) of the State CEQA Guidelines. These criteria are similar to those used in federal law. The CRHR is maintained by the state Office of Historic Preservation. Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR, as are state historical landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

#### **CRHR Criteria**

For purposes of CEQA, a historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the CRHR (California Public Resources Code [PRC] Section 21084.1). A resource is eligible for listing in the CRHR if it meets any of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Is associated with the lives of persons important in our past.
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Has yielded, or may be likely to yield, information important in prehistory or history.

The California Code of Regulations (CCR) further provides that cultural resources of local significance are CRHR-eligible (Title 14 CCR, Section 4852).

#### *Native American Heritage Commission*

The Native American Heritage Commission (NAHC), created in statute in 1976, is a nine-member body, appointed by the Governor, to identify and catalog cultural resources (i.e., places of special religious or social significance to Native Americans, and known graves and cemeteries of Native Americans on private lands) in California. The NAHC is also charged with ensuring California Native American tribes' accessibility to ancient Native American cultural resources on public lands (i.e. Sacred Lands File),



overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the NAGPRA. (NAHC).

*Human Remains*

According to Section 15064.5 of the State *CEQA Guidelines*, all human remains are assigned special importance and specific procedures are to be used when Native American remains are discovered. These procedures are discussed within Public Resources Code Section 5097.98 (PRC 5097.98). PRC 5097.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains.

*California Health & Safety Code (Sections 7050.5, 7051, and 7054)*

Sections 7050.5, 7051, and 7054 of the California Health & Safety Code collectively address the illegality of interference with human burial remains (except as allowed under applicable sections of the Public Resources Code), as well as the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, treatment of the remains prior to, during and after evaluation, and reburial procedures. (HSC 7050.5, HSC 7051, and HSC 7054).

*Senate Bill 18*

Senate Bill 18 (SB 18), effective September 2004, requires local government to notify and consult with California Native American tribes when the local government is considering adoption or amendment of a general or specific plan. Prior to adoption of a specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. Pursuant to Government Code Section 65352.3, prior to adoption or any amendment to a General Plan proposed on or after March 1, 2005, the city or county shall conduct consultations with California Native American tribes for the purpose of preserving or mitigation impacts to Cultural Places. The tribe(s) has 90 days from when the tribe is contacted by the city or county in which to request a consultation.

*Assembly Bill 52*

Assembly Bill 52 (AB 52), became effective on July 1, 2015, adding a new requirement to CEQA regarding tribal cultural resources. Public Resource Code (PRC) Section 21084.2 establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. This consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of "tribal cultural resources." In brief, in order to be considered a tribal cultural resource, or

TCR, a resource must be either 1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the state register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe. Elder testimony, oral, and written accounts are all considered to be examples of substantial evidence for determining the significance of a tribal cultural resource.

## Regional Regulations

There are no applicable regional regulations.

## Local Regulations

### *City of Riverside 2025 General Plan*

The City of Riverside 2025 General Plan contains objectives and policies that are considered applicable to the proposed Project as identified below (GP 2025, pp. HP-25 - HP-27, HP-28):

### ***Historic Preservation Element***

Objective HP-1 To use historic preservation principles as an equal component in the planning and development process.

Policy HP-1.1 The City shall promote the preservation of cultural resources to ensure that citizens of Riverside have the opportunity to understand and appreciate the City's unique heritage.

Policy HP-1.3 The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Policy HP-2.1 The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources.

Policy HP-2.3 The City shall provide information to citizens, and the building community about what to do upon the discovery of archaeological resources and burial sites, as well as, the treatment, preservation, and repatriation of such resources.

Objective HP-4 To fully integrate the consideration of cultural resources as a major aspect of the City's planning, permitting and development

Policy HP-4.3 The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

### *City of Riverside 2025 General Plan EIR*

There are no applicable mitigation measures from the Riverside 2025 General Plan EIR that pertain to tribal cultural resources.

### *City of Riverside Phase I General Plan Update*

There are no objectives or policies considered applicable to the proposed Project.

*City of Riverside Phase I General Plan Update EIR*

The are no applicable mitigation measures from the GPUI EIR that pertain to Tribal Cultural Resources.

*City of Riverside Municipal Code*

The following sections of the City's Municipal Code are applicable and pertain to tribal cultural resources:

**Title 20 – Cultural Resources.** The purpose of this title is to promote the public health, safety and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic or artistic value in the City for the following reasons:

- To safeguard the City's heritage as embodied and reflected in such resources;
- To encourage public knowledge, understanding and appreciation of the City's past;
- To foster civic and neighborhood pride and a sense of identity based on the recognition and use of cultural resources;
- To promote the enjoyment and use of cultural resources appropriate for the education and recreation of the people of the City;
- To preserve diverse and harmonious architectural styles and design preferences reflecting phases of the City's history and to encourage complementary contemporary design and construction;
- To enhance property values and to increase economic and financial benefits to the City and its inhabitants;
- To protect and enhance the City's attraction to tourists and visitors, thereby stimulating business and industry;
- To identify as early as possible and resolve conflicts between the preservation of cultural resources and alternative land uses;
- To integrate the preservation of cultural resources and the extraction of relevant data from such resources into public and private land management and development processes;
- To conserve valuable material and energy resources by ongoing use and maintenance of the existing built environment.
- To implement the City's General Plan.
- To work in concert with the City's Zoning Code

### **5.13.3 Comments Received in Response to the Initial Study/Notice of Preparation**

No comments were received regarding utilities and service systems in response to the Initial Study/Notice of Preparation (IS/NOP).

### **5.13.4 Thresholds of Significance**

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the Thresholds of Significance identified in Appendix G (“Environmental Checklist”) to the State CEQA Guidelines.

As identified in the Initial Study (Appendix A) prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this Draft EIR:

- 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 Resource Code section 5020.1(k); or
  - 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 Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

### 5.13.5 Project Design Features

Because no tribal cultural resources were identified at the Project site, no Project Design Features are incorporated that would lessen impacts related to tribal cultural resources. Mitigation measures included below would lessen impacts to unknown tribal cultural resources which may occur below the surface at the Project site.

### 5.13.6 Methodology

A *Cultural Resources Technical Report* was prepared by Dudek date May 2023 (DUDEK-A) and attached as Appendix C. The analysis herein is based upon this report consisting of a records search; search of the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF); a pedestrian survey; and development of an appropriate ethnographic context for the Project site.(DUDEK, p, 3)

#### *Record Search and Literature Review*

On September 3, 2020, the Eastern Information Center (EIC) completed a records search of the CHRIS database for the Project site and a one half mile radius buffer. At the time of this, the 1.5 miles utility line had not been added to the study area so only approximately one-half of the utility line was captured in the record search results. A supplemental records search request was submitted but results have not been received to date. The search identified and collected the records for any previously recorded cultural resources and cultural resource studies and reviewed the following lists in an effort to identify resources meeting the respective criteria for the NRHP, the CRHR, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. With respect to the built environment resources, the Built Environment Resources Database, California Inventory of Historical Resources (1976); Historical Maps; Local Inventories; and General Land Office and/or rancho plat maps were also reviewed. (DUDEK, p. 23)

The 1938 Kirkman-Harriman Historical Map was also reviewed. Based on this map, the Project site located is approximately 15 miles southwest of the San Bernardino Mountains, approximately 10 miles northeast of the Santa Ana Mountains, and approximately 5 miles south of the Jurupa Hills and mapped 0.2-mile south of the historical route of the Santa Ana River. The proposed utility line terminates



adjacent to the southern bank of the Santa Ana River's historical route. In this portion of the map, the Santa Ana River and the Project site are encircled by two roadways. Approximately 1.5 miles to the north of the Project parcel and 1.3 miles north of the proposed utility line is an unnamed northeast southwest trending road. To the south, the northeast southwest trending "Spanish Town Road" intersects the Project site. Within the land between the roadways are two (2) unnamed Native American villages. The villages are north of the Santa Ana River and equidistant from the Project site, approximately 4.5 miles to the east and west. It should be noted that this map is highly generalized due to scale and age and may be somewhat inaccurate with regards to distance and location of mapped features and was prepared based on review of historic documents and notes more than 100 years following secularization of the missions (in 1833). Although the map contains no specific primary references, it does matches the details documented by the Portolá expedition (circa 1769–1770). The map is a valuable representation of post-colonization mission history; however, it is limited to a specific period of Native American history and substantiation of the specific location and uses of the represented individual features should be verified by archaeological records and/or other primary documentation. (DUDEK, p. 26)

#### *Building Development and Archival Background Research*

A number of previously conducted studies and building development and archival research was also conducted. Both the *City of Riverside General Plan 2025 Program – Section 5.5 Cultural Resources* and *City of Riverside Historic Context Statement* documents were reviewed. Building development and archival research were conducted to establish a thorough and accurate historic context for the evaluations and to confirm the building development history. This included a review of Riverside County Building Permits, historical newspaper search, historical topographic maps, and historical aerial photographs. Part of this research also included requests for information from the Riverside Metropolitan Museum, Riverside Archives, and Riverside Historical Society. However, no information has been received to date from these entities. (DUDEK, pp. 28-32).

#### *Pedestrian Surveys*

An intensive level survey for historic built environment resources was conducted on May 11, 2022. The survey entailed walking only the exterior of the buildings on the subject property, documenting the property with notes and photographs, specifically noting character-defining features, spatial relationships, observed alterations, and examining any historic landscape features on the property. All field practices met the Secretary of Interior's standards and guidelines for a cultural resources inventory. (DUDEK, p. 33).

An archaeological pedestrian survey of the Project site was conducted on February 7, 2023. The survey focused on identifying exposed ground surface within landscaped areas and edges of pavement. All available ground surface was inspected for prehistoric artifacts (e.g., flaked stone tools, tool-making debris, groundstone tools, ceramics, fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions, features indicative of structures and/or buildings (e.g., standing exterior walls, post holes, foundations), and historical artifacts (e.g., metal, glass, ceramics, building materials). (DUDEK, p. 32).

#### *Native American Communications*

As part of the Phase I Cultural Resources Assessment, the Native American Heritage Commission (NAHC) was contacted on February 8, 2023, to request a Sacred Lands File (SLF) and a list of potentially interested Native American Tribes for the purposes of general Native American consultation under CEQA. (DUDEK, p. 27).

Pursuant to both AB 52 and SB 18, the City notified the following Native American tribes<sup>1</sup> of the proposed Project. The following tribes were notified related to AB 52:

- Gabrieleño Band of Mission Indians
- Soboba Bank of Luiseño Indians
- Cahuilla Band of Indians
- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- Morongo Band of Mission Indians
- Agua Caliente Band of Cahuilla Indians
- San Gabriel Band of Mission Indians

The following tribes were notified related to SB 18:

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Indians
- Cabazon Band of Mission Indians
- Cahuilla Band of Indians
- Los Coyotes Band of Cahuilla and Cupeño Indians
- Morongo Band of Mission Indians
- Pala Band of Mission Indians
- Pechanga Band of Indians
- Quechan Tribe of the Fort Yuma Reservation
- Ramona Band of Cahuilla
- Rincon Band of Luiseno Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseno Indians
- Torres-Martinez Desert Cahuilla Indians

Tribal responses are provided in **Table 5.13-A, Tribal Communications**, below. The Rincon Band of Luiseño Indians was the only tribe to request consultation.

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<sup>1</sup> Table 5.13-A provides a complete list of the Native American tribes that responded to either AB 52 and/or SB 18 consultation efforts.

**Table 5.13-A, Tribal Communications**

Native American Group (Individual Responding)	Response
Yuhaaviatam of San Manuel Nation [formerly known as the San Manuel Band of Mission Indians] (Ryan Nordness)	<ul style="list-style-type: none"> <li>▪ On November 21, 2022, the tribe indicated that the Project site is located outside of Serrano ancestral territory. Thus, consultation was not requested.</li> </ul>
Yuma Quechan Tribe (H. Jill McCormick)	<ul style="list-style-type: none"> <li>▪ On November 28, 2022, the tribe deferred to local tribes. Thus, consultation was not requested.</li> </ul>
Rincon Band of Luiseño Indians (Cheryl Madrigal)	<ul style="list-style-type: none"> <li>▪ On December 19, 2022, tribe indicated Project site is within the Luiseño Traditional Use Area and requested consultation</li> </ul>
Agua Caliente Band of Cahuilla Indians (Nicole Raslich)	<ul style="list-style-type: none"> <li>▪ On October 28, 2022, the tribe indicated that the Project site is located outside of the Tribe’s Traditional Use Area and deferred to other tribes. Thus, consultation was not requested.</li> </ul>

Source: City of Riverside

The City held tribal consultation meetings with Rincon Band of Luiseño Indians) as requested to further determine the potential for any impact. Results are discussed in Section 5.13.7 – Environmental Impacts below.

**5.13.7 Environmental Impacts**

***Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k);***

As discussed in Section 5.3 – Cultural Resources, the buildings are eligible for listing in the HRHP, CRHR and local register of historical resources. However, the structures are not associates with Native American activities or traditional uses and instead listed for eligibility based on its architectural features and historic character as a Mid-Century Modern department store . No prehistoric sites or resources documented to be of specific Native American origin have been previously recorded within the records search area or the Project site (DUDEK, p. 23). Thus, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 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 Resource Code section 5020.1(k) as the structures are not associated with traditional Native American activities. Therefore, **no impacts** are anticipated.

***Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A 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 Resource Code section 5024.1; in applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?***

As discussed above, there are no known Native American cultural resources within the Project site. However, the potential for intact cultural deposits to exist within native soils (encountered from 2 feet below ground surface in some areas) to the depths of proposed ground disturbance (approximately 8 feet below ground surface) is considered moderate and the Project site is within a geographical region known for supporting Native American occupation. The Project site is within the vicinity of two unnamed Native American villages and transportation routes as mapped on the 1938 Kirkman Harriman map. Additionally, the Project site is within the Santa Ana River watershed, an area that would provide sustainable resources for habitation. Archival research indicates that the Project site has been occupied since at least the early twentieth century. Initially used as agricultural land, the Project site transitioned to rural residential properties in the early to mid-twentieth century and again to a fully developed commercial property in the 1960s. (DUDEK, p 65).

While the “Spanish Town Road” as identified by the 1938 Kirkman Harriman map, intersects the Project site, no archaeological evidence of this feature was provided in the CHRIS records search results or review of other archaeological information. Additionally, the CHRIS results contained no archaeological evidence of the Native American villages within proximity to the Project site. This is likely because the nearest mapped villages are located outside the Project’s one half mile records search radius. (DUDEK, pp. 26).

Development of the Project site may have buried unknown cultural resources associated with Native American use and/or historic-period agricultural or residential properties. Native soils underlying the artificial fill consist of alluvial deposits from the terminal Pleistocene. These soils are considered contemporaneous with human use, and therefore retain the potential to preserve cultural material in context. (DUDEK-A, p. 65, DUDEK-B, p. 5)

Though the archaeological survey was negative for cultural resources associated with Native American use, the existing development within the Project site provided little to no observable ground surface for inspection; thus, the negative findings of the archaeological survey are an unreliable indicator of the archaeological sensitivity of the Project site. Previous and proposed ground disturbances were considered in light of the potential for yet unknown archaeological resources and human remains to be encountered leading to a determination that there is a potential for an inadvertent discovery of unknown archaeological resources and human remains to occur during Project implementation. Implementation of mitigation measures **MM TCR-1** and **MM TCR-4** would ensure the proper treatment of any cultural resources and human remains associated with Native Americans encountered during ground disturbing activities. (DUDEK, p 65) Additionally, the City as lead agency, is required to coordinate with Native American Tribes through AB 52 and SB 18 consultation processes for the proposed Project and proposed General Plan Amendment. As identified in **Table 5.13-A** above, the City of Riverside notified four local tribal governments on October 28, 2023 of the proposed Project pursuant to AB52 and SB18.



Of the tribes contacted for AB52 and SB18 consultation, only Rincon Band of Luiseño Indians requested consultation with the City. In a letter dated December 19, 2022, Cheryl Madrigal, Tribal Historic Preservation Officer, of the Rincon Band of Luiseño Indians Cultural Resource Department, that the Project area is within the Traditional Use Area of the Luiseno people. As such, the Rincon Band of Luiseño Indians is traditionally and culturally affiliated to the Project area. During consultation efforts, mitigation measures were proposed by the City and reviewed by Rincon Band of Luiseño Indians. After review of the proposed mitigation measures, Rincon Band of Luiseño Indians had no additional comments and concluded consultation efforts on May 22, 2023.

As a result of the City's consultation efforts, implementation of mitigation measures **MM TCR-1** and **MM TCR-4** would reduce impacts to any potential tribal resources. Thus, with implementation of mitigation measures **MM TCR-1** and **MM TCR-4**, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 that is a resource determined significant to a California Native American Tribe. Therefore, impacts are **less than significant with mitigation incorporated**.

### 5.13.8 Recommended Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impact to tribal cultural resources. However, there is a potential that unknown resources on the Project site may have been obscured by pavement or other materials over the years. As such, the potential exists for unknown tribal cultural resources to be present and Project construction activities may impact unknown tribal cultural resources within the Project disturbance area. As a result of the Tribal Consultation with the Rincon Band of Luiseño Indians, the City's standard mitigation measures related to the disposition of any uncovered artifacts that may be inadvertently discovered during ground disturbance will be incorporated as outlined below to reduce impacts related to tribal cultural resources to less than significant levels.

Mitigation measures **MM TCR-1** and **MM TCR-4** will be implemented to reduce impacts to unknown cultural resources to less than significant with mitigation incorporated.

**MM TCR-1 Consultation.** 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

**MM TCR-2 On call 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 call during all grading and other significant ground-disturbing activities in native sediments.

**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 to be thoroughly inventoried with tribal monitor oversight of the process; 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. 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. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. 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.

**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.

### **5.13.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

As a result of the City's Tribal Consultation efforts, **MM TCR-1** through **MM TCR-4** will be incorporated in order to address the unlikely discovery of unknown tribal cultural artifacts during construction. Mitigation measure **MM TCR-1** through **MM TCR-4** provides the process of how any artifacts will be handled. Implementation of these mitigation measures will not result in residual environmental impacts.

## 5.14 Utility and Service Systems

The focus of this section is to analyze potential impacts related to utilities and service systems, such as water, wastewater treatment, storm water drainage, solid, waste, natural gas, electrical power, and telecommunication facilities. The following discussion addresses the potential impacts that could result from the construction of new or expanded facilities as a result of the proposed Project. The Initial Study attached as Appendix A to this Draft EIR, determined that the Project would result in a less than significant impact to stormwater drainage, electric power, natural gas, and telecommunication facilities. Since no new, expanded, or relocated facilities are anticipated for these utilities, they will not be further analyzed in this Draft EIR so the analysis below will only focus on water, sewer, and solid waste. Cumulative impacts are discussed in Section 7.0 – Other CEQA Topics.

A *Water Service Availability Notice* was provided by the Riverside Public Utilities Department dated May 10, 2023 (RPU-WS) and a *Sewer Study Memorandum* was prepared by Carollo Engineers, Inc. dated December 20, 2022 (CAROLLO). These letters are included in Appendix G of this Draft EIR

### 5.14.1 Setting

The Project site is currently developed but vacant, located in an urbanized area with generally flat topography. Existing utility systems and infrastructure are present within and adjacent to the Project site. The utility companies that would serve the Project site and the existing utilities located on or adjacent to the Project site are listed in **Table 5.14-A, Utility Providers**, below.

**Table 5.14-A, Project Utility Providers**

Utility	Provider	Existing Location
Potable Water	Riverside Public Utilities Department	<ul style="list-style-type: none"> <li>▪ 12-inch line in Arlington</li> <li>▪ 8-inch and 36-inch lines in Streeter Avenue</li> </ul>
Sewer	Riverside Public Works	<ul style="list-style-type: none"> <li>▪ 21-Inch line in Arlington Avenue</li> <li>▪ 8-inch line in Streeter Avenue</li> </ul>
Storm Drain	Riverside County Flood Control and Water Conservation District, and Riverside Public Works	<ul style="list-style-type: none"> <li>▪ 24-inch line in Arlington Avenue</li> <li>▪ 30-inch and 33-inch lines in Streeter Avenue</li> </ul>
Natural Gas	Southern California Gas Company	<ul style="list-style-type: none"> <li>▪ Lines in both Arlington and Streeter Avenues</li> <li>▪ 30-inch transmission line<sup>1</sup> in Arlington Avenue</li> </ul>
Electric	Riverside Public Utilities Department	<ul style="list-style-type: none"> <li>▪ Overhead power lines along Arlington and Street Avenues</li> </ul>
Solid Waste	Riverside Public Works (or through contract with private local haulers)	Not Applicable
Television	Varies	<ul style="list-style-type: none"> <li>▪ Overhead power lines along Arlington and Street Avenues</li> </ul>



**Table 5.14-A, Project Utility Providers**

Utility	Provider	Existing Location
Telephone	Varies	<ul style="list-style-type: none"> <li>▪ Overhead power lines along Arlington and Street Avenues</li> </ul>
<p>Notes:</p> <ol style="list-style-type: none"> <li>1. Transmission lines are generally large diameter pipelines that operate at pressures above 200 psi and transport gas from supply points to the gas distribution system.</li> </ol>		

**Existing Potable Water Facilities**

The City of Riverside established its own water utility, the Riverside Public Utilities Department (RPU), in 1913 (GP 2025 FEIR, p. 5.16-5). RPU’s primary source of supply is ground water. RPU has facilities to extract groundwater from five groundwater basins: Bunker Hill, Rialto-Colton, Riverside North, Riverside South, and Arlington Basins. The Riverside Basin is divided into Riverside North and Riverside South by the San Bernardino County/Riverside County boundary. The Riverside North and South sub-basins are hydro geologically connected but separated for administrative purposes. RPU’s service area is approximately 75 square miles, 70 of which are located within the City of Riverside. In addition to retail potable water service, RPUD delivers water to two wholesale customer agencies: Western Municipal Water District and City of Norco. Most of RPUD’s current retail customers are residential (mostly single family). All other customers consist of commercial/institutional, landscape, agricultural irrigation uses, as well as other land uses such as fire and temporary special needs. (UWMP, pp. 3-5, 4-4, 6-2).

RPU currently has 53 active wells (46 producing potable water). RPU has 20 inactive wells that are being used as monitoring wells and 13 other monitoring wells, for a total of 33 dedicated monitoring wells. Raw groundwater from many of RPU’s wells receives treatment prior to entering the potable distribution system. (UWMP, p. 6-2).

If additional water supply is needed RPU has an agreement with the Western Municipal Water District (WMWD) to access imported water when needed. This agreement can provide RPU with up to 21,700 acre feet per year (AFY) of imported water. RPU also has an exchange agreement with the City of Norco for the sale of up to 1,000 AFY and the exchange of water during emergencies. RPU also has the ability to purchase SWP water from WMWD through a connection at the Metropolitan Water District (MWD) Henry J Mills Water Treatment Plant where up to 19.4 million gallons per day (mgd) of imported water can be purchased from the Water Management District (WMD) through an existing agreement and can be conveyed through existing infrastructure. Existing potable water supply and demands are identified below in **Table 5.14-B, Existing Potable Water Supply and Demand**. (UWMP, pp.6-2).

<b>Table 5.14-B, Existing Potable Water Supply and Demand</b>		
Type	Supply (AFY)	Demand (AFY)
Potable	74,262	69,347
Source: UWMP, Table 4-2 and Table 6-9		

The Project site lies within the service area of the RPU (GP 2025, p. PF-3). The former Sears Department Store and Auto Service Center buildings are connected to an existing 12-inch diameter potable water pipeline in Arlington Avenue and an existing 8-inch diameter pipeline in Streeter Avenue.

### **Existing Non-Potable (including Recycled) Water Facilities**

RPU produces and distributes disinfected, tertiary treated recycled water for non-portable uses. Non-potable uses are supplied from the City of Riverside Regional Water Quality Control Plant. RPUD currently has 7 active wells producing non-potable water. By agreement, RPU delivers non-potable water to WMWD via the Riverside canal while meeting the demands of retail customers within its service area. The Project site lies within the service area of RPU for non-potable water (GP 2025, p. PF-3). The City currently operates a recycled water distribution system with a combined pipeline length of approximately 5.4 miles. The existing use of recycled water is 141 AFY. There is an existing 12-inch diameter non-potable water pipeline in Arlington Avenue adjacent to the Project site.

### **Existing Wastewater (Sewer) Facilities**

The City's Public Works Department (RPW) provides for the collection, treatment, and disposal of all wastewater through its Riverside Regional Water Quality Control Plant (RWQCP) and complies with state and federal requirements governing the treatment and discharge of wastewater. The City's service area comprises approximately 81.5 square miles broken into five sewer basins: Arlanza, Northside, Phoenix, Spruce, and Tequesquite. The collection system conveys wastewater flows through these basins to the RWQCP through four major sewers: Acorn/Arlanza Trunk Sewer (A/A Trunk Sewer), Santa Ana Trunk Sewer (Riverside/Hillside), Jurupa Force Main, and Rubidoux Force Main. The Jurupa and Rubidoux force mains bring flows from the Jurupa and Rubidoux Community Service Districts (CSDs), respectively and exclusively. The Edgemont CSD and Highgrove Community, which have individual agreements with the City, both route their wastewater flows through the Santa Ana Trunk Sewer (Riverside/Hillside). (SSWIMPU, p. ES-10).

The existing wastewater collection system includes approximately 16,000 manholes; 20 lift stations; 19 wastewater pump stations that range in size from less than 100 gallons per minute (gpm) to over 2,000 gpm; 10.4 miles of force mains, more than 830 miles of gravity public sewer pipes ranging in size from 4-inches to 51-inches in diameter, and 412 miles of City-owned laterals. Almost 82 percent of the system consists of 8-inch diameter and smaller pipes and over 90 percent of the collection system is comprised of vitrified clay pipe. The firm capacity of the lift stations range in size from 80 gpm to the largest lift station Pierce Street Lift Station, with 11,100 gpm of firm pumping capacity. (SSMP, p. 1; WIMPU, p. ES-14).

As identified in **Table 5.14-C, Existing and Projected Wastewater Capacity** below, the RWQCP currently treats approximately 28 million gallons per day (mgd) of average annual flow (AAF) and primary, secondary, and tertiary treatment of wastewater for a rated hydraulic capacity of approximately 46 mgd AAF. The RWQCP provides treatment from the Jurupa, Rubidoux, and Edgemont Community Services Districts in addition to treating wastewater generated in the community of Highgrove and serves a population of more than 300,000. A daily influent flow of approximately 39 mgd has been projected through the year 2037. (RIV-A; WIMPU p, ES-1).

**Table 5.14-C, Existing and Projected Wastewater Capacity**

Daily Influent Flow	Capacity (mgd)
Existing <sup>1</sup>	28
Maximum Capacity <sup>1</sup>	46
Projected 2037 Daily Inflow <sup>2</sup>	39
<b>Notes:</b>	
1. Source: WIMPU, pp. ES-1	
2. Source: WIMPU, pp. ES-6	

**Existing Solid Waste**

Solid waste, recycling, and green waste collection and disposal service in the City is provided by the City Public Works Department. Athens Services has a contract with the City to provide various trash collection and recycling services to businesses and multi-family properties within the City of Riverside. As such, the proposed Project would be services by Athens Services. The City also sponsors a program known as “Clean Up Riverside” that provides collection events such as Incredible Bulky Item Drop-off, E-Waste Shredding and Bulb/Battery Collection, Household Hazardous Waste and throughout the year which is open to the residents. (SW-B,RIV-B).

The Agua Mansa Transfer Station (formerly known as the Robert A. Nelson Transfer Station), located at 1830 Agua Mansa Road, is owned by the County of Riverside and is operated under a 20-year franchise by Burrtec Waste Industries Inc. Non-hazardous waste is taken to the transfer station, to be sorted and then transported to the Badlands Landfill. Trash haulers may also dispose of collected waste at other County landfills in the area, such as the Lamb Canyon Landfill and El Sobrante landfill. (GP 2025 FEIR, p. 5.16-15).

The Badlands Landfill is a regional municipal solid waste landfill that is owned and operated by Riverside County located at 31125 Ironwood Avenue in the City of Moreno Valley – approximately 17 miles west of the Project site. The El Sobrante Landfill is a regional municipal solid waste landfill that is owned and operated by USA Waste Services of California, Inc. located at 10910 Dawson Canyon Road in the City of Corona – approximately 10 miles northeast of the Project site. The Lamb Canyon Sanitary Landfill is a regional municipal solid waste landfill that is owned and operated by Riverside County Department of Water Resources located at 16411 Lamb Canyon Road in the City of Beaumont – approximately 24 miles northwest of the Project site. **Table 5.14-D, Existing Solid Waste** below, identifies the capacity and intake of each solid waste facility serving the Project site.

**Table 5.14-D, Existing Solid Waste Capacity**

Landfill	Total Capacity (CY <sup>2</sup> )	Remaining Capacity (CY)	Maximum Permitted Daily Intake (TPD <sup>3</sup> )	Average Daily In-Take (TPD)
Badlands <sup>1</sup>	82,300,000	7,800,000	5,000	2,883
El Sobrante	209,910,000	143,977,170	16,054	10,845
Lambs Canyon	39,618,513	19,242,950	5,000	2,101
Agua Mansa Transfer Station	NA	NA	4,000	NA <sup>4</sup>

Source: CAL-A, CAL-B, CAL-C, DWR-A, DWR-B, DWR-C

**Notes:**

1. This landfill has a “ceased operation date” of January 1, 2059. (CAL-A)
2. CY=Cubic Yards
3. TPD=Tons per day
4. Average Daily In-Take amount not available. However, April 2023 inspection report indicates daily in-take is not being exceeded.

## 5.14.2 Related Regulations

### Federal Regulations

#### *Clean Water Act*

The United States Environmental Protection Agency (USEPA) has delegated responsibility for compliance with the federal Clean Water Act to the State of California, which is discussed under “State Regulations.”

There are no other federal regulations that apply to the water supply, wastewater and solid waste services that are needed to serve the Project.

### State Regulations

#### *Urban Water Management Planning Act*

The Urban Water Management Planning Act (1983), which was codified into Sections 10610 to 10656 of the California Water Code, requires urban water suppliers to develop water management plans to actively plan ahead for future water supplies to meet future anticipated water demands. Every five years, water suppliers are required to develop Urban Water Management Plans (UWMPs) for approval by the California Department of Water Resources (DWR). UWMPs can be used as the main source of information for WSAs and WSVs.

#### *Clean Water Act*

The Clean Water Act prohibits the discharge of pollutants to waters of the United States unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Applicable NPDES permits are those managed on a statewide basis by the State Water Resources Control Board (i.e., General Permits), such as the General Industrial Activities Storm Water Permit and the General Construction Activity Storm Water Permit. Both of these permits require a Storm Water Pollution Prevention Plan (SWPPP); the industrial permit requires an industrial SWPPP used in perpetuity based on the SIC code, and the construction permit requires a SWPPP for construction phase only. In addition, the State Board issues statewide municipal permits for Municipal Separate Storm Sewer Systems (MS4) owned by municipalities. (MS4).



The MS4 permit program regulates all stormwater discharges from municipal storm drains. The Santa Ana RWQCB regulates the Riverside County MS4 permit (Order No. R8-2010-0033), which requires the principal permittee Riverside County Flood Control and Water Conservation District (RCFC&WCD) and co-permittees (County of Riverside and cities, including the City of Riverside) to develop several items designed to reduce pollutants in urban runoff to the Maximum Extent Practicable (MEP). Specifically for qualifying new developments and redevelopments, this includes a Water Quality Management Plan (WQMP). All future development within the Project site would be required to prepare a project specific WQMP.

#### *California State Water Resources Control Board*

In the State of California, the State Water Resources Control Board and nine Regional Water Quality Control Boards (RWQCB) are responsible for implementing the Clean Water Act (CWA) and the State Porter Cologne Water Quality Control Act. The Porter-Cologne Water Quality Control Act Section 13000 directs each Regional Water Quality Control Board (RWQCB) to develop a Water Quality Control Plan (Basin Plan) for all areas within its region. The Basin Plan is the basis for each RWQCB's regulatory programs. The City of Riverside is located within the purview of the Santa Ana RWQCB (Region 8) and must comply with applicable elements of the region's Basin Plan, as well as the Porter-Cologne Water Quality Control Act.

#### *Water Conservation Act*

The Water Conservation Act of 2009, or Senate Bill 7X-7, set a requirement for water agencies to reduce their per capita water use by the year 2020. The overall goal is to reach a statewide reduction of per capita urban water use of 20 percent by December 31, 2020, with an intermediate 10 percent reduction by December 31, 2015. Demand reduction can be achieved through both conservation and the use of recycled water as a potable demand offset.

The City of Riverside has codified landscaping and irrigation requirements under Water Efficient Landscaping and Irrigation in Title 19, Chapter 19.570 of the City Municipal Code.

#### *California Water Code*

Sections 13550–13556 of the State Water Code provide that local, regional, or state agencies shall not use water from any source of quality for non-potable uses if suitable recycled water is available as provided in Section 13550 of the Water Code.

#### *California Integrated Waste Management Act (Assembly Bill 939)*

Solid waste regulation in California is governed by the California Integrated Waste Management Act of 1989, which is commonly known as Assembly Bill (AB) 939. The Act, codified into the California Public Resources Code, emphasizes a reduction of waste disposed in California landfills. To achieve a reduction of waste in California landfills, AB 939 requires all city and county plans to include a waste diversion schedule with the goals to divert 25 percent of solid waste from landfills by 1995 and divert 50 percent of solid waste from landfills by the year 2000. To achieve these goals, AB 939 emphasizes that cities and counties reduce, recycle, and reuse solid waste. To attain these goals for reductions in disposal, AB 939 established a planning hierarchy utilizing new integrated solid waste management practices.

#### *Assembly Bill 341*

California Assembly Bill 341 (Chapter 476, Statutes of 2011) directed CalRecycle to develop and adopt regulations for mandatory commercial recycling. The final regulation was approved by the Office of Administrative Law on May 7, 2012. AB 341 was designed to help meet California's recycling goal of 75

percent by the year 2020. AB 341 requires all commercial businesses and public entities that generate four cubic yards or more of waste per week to have a recycling program in place. In addition, multi-family apartments with five or more units are also required to form a recycling program.

*Assembly Bill 1826*

AB 1826 (2014) is the statewide mandatory organic waste recycling law that requires businesses and multi-family properties to arrange for organic waste recycling services that generate 4 cubic yards of organic waste or more, effective January 2017.

*Senate Bill 1383*

SB 1383 (2016) requires CalRecycle to adopt regulations that achieve the specified targets for reducing organic waste in landfills. The bill authorizes local jurisdictions to charge and collect fees to recover the local jurisdiction's costs incurred in complying with the regulations.

## **Regional Regulations**

*Countywide Integrated Waste Management Plan*

The County of Riverside *Countywide Integrated Waste Management Plan* (CIWMP) was prepared in accordance with the California Integrated Waste Management Act of 1989, Chapter 1095 (AB 939). The CIWMP's components include the Countywide Summary Plan, the Countywide Siting Element, the Source Reduction and Recycling Element (SRRE), the Household Hazardous Waste Element (HHWE) and Non-Disposal Facility Element (NDFE).

The Summary Plan summarizes the steps needed to cooperatively implement programs among the County's jurisdictions to meet and maintain the 50 percent diversion mandates. The Siting Element demonstrates that there are at least 15 years of remaining solid waste disposal capacity to serve all the jurisdictions within the County. If there is not adequate capacity, a discussion of alternative disposal sites and additional diversion programs must be included in the Siting Element. The SRRE was developed separately by each Riverside County jurisdiction to analyze the local waste stream to determine where to focus diversion efforts, including programs and funding. The HHWE was developed by jurisdictions and provides a framework for recycling, treatment, and disposal practices for Household Hazardous Waste programs. The NDFE identifies and describes existing and proposed facilities, other than landfills and transformation facilities, requiring a solid waste permit to operate. Non-disposal facilities are also those facilities that will be used by a jurisdiction to meet its diversion goals. The Riverside County NDFE identifies and describes those non-disposal facilities that will be needed to implement the Riverside County SRRE. (CIWMP).

## **Local Regulations**

*City of Riverside 2025 General Plan*

The City of Riverside General Plan contains objectives and policies that are considered applicable to the proposed Project, as identified below (GP 2025, pp. PF-12 – PF-13, PF-16, PF-19, OS-57 – OS-58):

***Public Facilities and Infrastructure Element***

Objective PF-1: Provide superior water service to customers.

Policy PF-1.1: Coordinate the demands of new development with the capacity of the water system.

- Policy PF-1.2 Support the efforts of the Riverside Public Utilities Department, Eastern Municipal Water District and Western Municipal Water District to work together for coordination of water services.
- Policy PF-1.3: Continue to require that new development fund fair-share costs associated with the provision of water service.
- Policy PF-1.4: Ensure the provision of water services consistent with the growth planned for the General Plan area, including the Sphere of Influence, working with other providers.
- Policy PF-1.5: Implement water conservation programs aimed at reducing demands from new and existing development.
- Policy PF-3.2: Continue to require that new development fund fair-share costs associated with the provision of wastewater service.

***Open Space and Conservation Element***

- Objective OS-10: Preserve the quantity and quality of all water resources throughout Riverside.
- Policy OS-10.1: Support the development and promotion of water conservation programs.

*City of Riverside 2025 General Plan EIR*

There are no applicable mitigation measures from the 2025 General Plan EIR that pertain to Utilities and Service Systems.

*City of Riverside Phase I General Plan Update*

There are no objectives or policies within the GPUJ that are considered applicable to the proposed Project.

*City of Riverside Phase General Plan Update EIR*

There are no applicable mitigation measures from the GPUJ EIR that pertain to Utilities and Service Systems.

*City of Riverside Municipal Code*

The following sections of the City's Municipal Code are applicable and pertain to utility and service systems.

**Chapter 6.06 – Business and Multifamily Solid Waste, Recycling and Organics Recycling.** It is the intent and purpose of this chapter to promote recycling and organics recycling. It is further the purpose of this chapter to provide a mechanism to require the implementation of recycling programs and organics recycling programs for covered generators within the city to thereby enable the city to meet and maintain the 50 percent waste diversion requirements set forth in Section 41780(a)(2) of the California Public Resources Code.

**Chapter 14.22 – Water Conservation.** This chapter establishes a Water Conservation Program which uses five stages to address conditions and needs. The Water Conservation Stage shall be set by City Council action. All normal water efficiency programs and water conservation regulations shall remain in force during any stage unless the City Council directs otherwise.

- A. Stage One represents normal conditions; Stages Two, Three, Four, and Five represent potential and actual shortages. Stages Two, Three, Four, and Five may be triggered by a local or regional water supply shortage; production, treatment, transmission, or delivery infrastructure problems; limited or unavailable alternative water supplies; or other circumstances.
- B. Stage one conservation measures are voluntary, and will be encouraged through public outreach, education, and awareness measures by the City.
- C. Stages Two, Three, Four, and Five conservation measures are mandatory, and violations may be subject to criminal, civil, and administrative enforcement.

#### *Urban Water Management Plan*

The 2020 Urban Water Management Plan (UWMP) provides an overview of the RPUD's long-term water supplies and demands and reports on the City's progress towards meeting the water use efficiency targets. The plan includes demand management measures that the RPUD has agreed to implement to achieve water supply savings. In accordance with Water Code 10632 requirements, RPUD is responsible for conserving the available water supply, protecting the integrity of water supply facilities, and implementing a contingency plan in times of drought, supply reductions, failure of water distribution systems, or emergencies. As such, RPUD adopted Water Shortage Contingency Plan (WSCP) to regulate the delivery and consumption of water use during water shortages. The WSCP defines five shortage stages and outlines the actions that will be required of customers during each stage. (UWMP, pp. iii, 8-1-3).

#### *2020 Update of the Integrated Master Plan for the Wastewater Collection and Treatment Facilities*

In January 2020, the 2008 Integrated Master Plan for the Wastewater Collection and Treatment Facilities (Master Plan Update) for the City of Riverside RPW was updated. The Master Plan Update was prepared to facilitate planning through a 20-year horizon for the City's RWQCP and collection system. The recommended plan is intended to enable the RWQCP to continue to reliably provide wastewater treatment for the City and surrounding communities as the wastewater flow and loading increase due to projected population growth. In addition, a Capital Improvements Program (CIP) and the resulting rate structure was developed. The Master Plan Update also brings key portions of the 2008 Master Plan and the 2014 rate and development study up to date and addresses collection system and facility needs for projected influent flow and loading through the year 2037. (WIMPU, p. ES1).

#### *Sewer System Management Plan*

On May 2, 2006, the State Water Resources Control Board adopted the California State Water Resources Control Board (CSWRCB) Order No. 2006-0003-DWQ -- Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDRs). WDRs require owners and operators of collection systems to apply for coverage and abide by its provisions and prohibitions. Its purpose is to prevent sanitary sewer overflows (SSOs) and establish uniform procedures for monitoring and reporting. On October 13, 2006, the City applied for coverage under this order by submitting a Notice of Intent (NOI) to the State Water Board. On January 18, 2007, the City obtained an account on the State of California SSO Database California Integrated Water Quality System. This provided the City with a mechanism to report SSOs in accordance with the WDRs. The WDRs also require the development and implementation of a Sewer System Management Plan (SSMP). A SSMP must include provisions to provide proper and efficient management, operation, and maintenance of sanitary sewer systems, while taking into consideration risk management and cost benefit analysis. Additionally, a SSMP must contain a spill response plan that establishes standard procedures for immediate response to an SSO in a manner



designed to minimize water quality impacts and potential nuisance conditions. The City's SSMP was adopted in July 2009 and revised in June 2022. The SSMP was developed by the City's Public Works Department to comply with CSWRCB Order No. 2006-0003-DWQ. (SSMP, p. 1).

### 5.14.3 Comments Received in Response to the Initial Study/Notice of Preparation

No comments were received regarding utilities and service systems in response to the Initial Study/Notice of Preparation (IS/NOP).

### 5.14.4 Thresholds of Significance

The City of Riverside has not established local CEQA significance thresholds and instead, defers to the thresholds of significance identified in Appendix G ("Environmental Checklist") to the State CEQA Guidelines.

As identified in the Initial Study (Appendix A), and as outlined in Section 4.0 of this DEIR, implementation of the proposed Project will have a less than significant impact in the following area and this topic is not addressed in this DEIR:

- Comply with federal, state, and local management and reduction statute and regulations related to solid waste.

As identified in the Initial Study prepared for this Project, implementation of the proposed Project will have potentially significant impacts in the following areas and these topics are addressed in this DEIR:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects;
- Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; and
- 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.

### 5.14.5 Project Design Features

The Project will connect to the following water, sewer, and storm drain facilities as reflected in the Existing and Proposed Utility Plan shown in **Figure 3.0-33** of this Draft EIR. Hence, the Project will incorporate the following project design features (PDFs):

#### *Water*

- 10-inch water lateral will tie into existing 8-inch water pipeline located at the northwestern corner on of the Project boundary along Streeter Avenue and another 10-inch lateral will tie in at the southwest corner of Project boundary along Streeter Avenue;
- 10-inch meter and backflow will tie in to existing 12-inch water line located along Arlington Avenue at two connection points

- Additionally, the Project will install two Double Check Detector Assembly (DCDA), that will connect to the existing 12-inch water pipeline along Arlington Avenue. All other fire hydrants will be connected to internal water lines constructed by the Project.

#### *Sewer*

- Sewer mains throughout project site;
- 8-inch sewer lateral will connect to existing 21-inch sewer line in Arlington with two connection points; and
- 8-inch sewer lateral will connect to existing 8-inch sewer pipe in Streeter Avenue.

#### *Storm Drain*

- 18-inch storm drain lateral will connect to existing 33-inch storm drain line in Streeter Avenue.
- 24-inch storm drain will tie into existing 33-inch storm drain line in Streeter Avenue.

The Project includes design features that will provide Water Conservation and reduction in Solid Waste as follows:

- The Project site will be landscaped with a plant palette consistent with Riverside Citywide Design Guidelines for Water Efficient Landscape and Irrigation Design Guidelines.
- Design buildings to be water-efficient. Install water-efficient fixtures in accordance with Section 5.303 of the California Green Building Standards Code Part 11; and
- The Project will utilize the crushed concrete from the demolition phase as engineering fill.

### **5.14.6 Methodology**

In order to identify potential impacts, the proposed Project is compared to existing utility service levels. The analysis herein is based upon the City's *UWMP* and *Water Supply Availability* to determine capacity of existing facilities to meet both potable and non-potable water demands of the proposed Project.

The City's *2020 Update of the Integrated Master Plan for the Wastewater Collection and Treatment Facilities (2020 Sewer Master Plan Update)*, *Sewer System Management Plan*, and *Sewer Study Memorandum* which includes a hydraulic evaluation are used to determine capacity of existing sewer facilities to meet the needs of the Project. The model evaluated in the *Sewer Study Memorandum* includes the use of 10-inch diameter or larger pipelines as well as some 8-inch diameter and smaller pipelines, where needed for connectivity. Implementation of the Project would result in a change of land use type and the change in rain derived inflow and infiltration during a wet weather flow event rate so these circumstances were also taken into account during the hydraulic modeling process. (CAROLLO, p.1).

Additionally, the Robert A. Nelson Transfer Station, and El Sobrante, Badlands, and Lambs Canyon landfills are reviewed for their capacity to meet the needs of the Projects' solid waste needs during both construction and operation.

### 5.14.7 Environmental Impacts

***Threshold: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?***

As previously indicated in Section 5.14 above, the Initial Study determined that Project would result in a less than significant impact storm drain, electric, natural gas, and telecommunication facilities so these utilities will not be further analyzed in accordance with *State CEQA Guidelines* Section 15128. As outlined in the Initial Study and in Section 4.0 of this EIR, the electrical utility 1.5-mile extension involving trenching in existing paved roadways will not result in significant impacts. This EIR document considers the physical improvements of this electrical offsite improvement throughout the analysis herein.

#### *Water and Wastewater*

The focus of the analysis below, pursuant to the Initial Study, is related to water and wastewater. The Project includes construction of an on-site network of water and sewer pipes that will connect to existing water and sewer lines in Arlington and Streeter Avenues. The installation of water and sewer line connections as proposed by the Project may result in physical environmental impacts. However, the Project's construction phase is evaluated throughout this Draft EIR. In instances where significant impacts may have been identified for the Project's construction phase, mitigation measures are recommended in each applicable subsection of this Draft EIR so the construction of water and sewer laterals would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this Draft EIR. Thus, the proposed Project does not require or result in the relocation or construction of new water or wastewater treatment facilities.

#### *Conclusion*

Therefore, the implementation of the Project would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation. Therefore, impacts are **less than significant for water and wastewater facilities needed to serve the Project.**

***Threshold: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?***

RPU currently services the Project area, via existing water lines along Arlington Avenue and Streeter Avenue. The Project includes the water PDFs identified in Section 5.14.5 above which includes two laterals for connection to the existing water line on Streeter Avenue.

The City's 2020 *Urban Water Management Plan* (UWMP) developed water demand projections considering variables such as climate, population growth, and customer behaviors. 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 estimates water service reliability by calculating supply and demand for the following scenarios normal year supply, single dry year supply and multiple dry year supply. These estimates are based on assumptions that 100 percent of RPU's groundwater and recycled water supplies would remain available during a single dry year and multiple dry years. The availability of imported water has been adjusted based on the reliability assessment by WMWD. **Table 5.14-E, Water Service Supply and Demand<sup>1</sup>** below, shows estimated supply and demand calculated in the UWMP for future years. For all the scenarios (normal year, single

dry year, and multiple dry year) the available water supply is greater than the anticipated demands. (UWMP, pp. III, 7-5, 7-6).

**Table 5.14-E, Existing and Future Water Service Supply and Demand<sup>1</sup>**

Scenario		2025	2030	2035	2040	2045
Normal Year	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Single Dry Year	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years <b>First Year</b>	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years <b>Second Year</b>	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years <b>Third Year</b>	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years <b>Fourth Year</b>	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Multiple Dry Years <b>Fifth Year</b>	Supply	114,923	124,893	128,193	129,693	129,693
	Demand	90,712	100,803	103,260	105,807	108,447
Source: UWMP, Tables 7-2 thru 7-4						
<b>Notes:</b>						
1. All Values are provided in Acre Feet.						

As identified in **Table 5.14-E** above, water supplies are estimated to accommodate demand projections through 2045 under normal and multiple dry-year conditions. As mentioned in Section 5.9 – Population and Housing of this Draft EIR, implementation of the Project would result in development of 388 housing units that will increase population; by approximately 1,273 residents leading to a permanent increase in demand for water supply.

Per SB X7-7 water agencies are required to calculate their baseline water use for a 10 to 15 year period. As such RPU determined in their 2020UMWP that average base daily per-capita water use within the RPU service area was 266 gallons per capita per day. (UWMP, pp. 5-1 - 5-2). Utilizing this information, **Table 5.14-F, Projected Water Demand** projects the anticipated water demand of the proposed Project below.



**Table 5.14-F, Projected Water Demand**

Projected Population <sup>1</sup>	Water Generation Rate (GCD) <sup>2</sup>	Project Demand GCD <sup>3</sup>	Demand AFY <sup>4,5</sup>
1,273	266	338,618	379.3

Source: UWMP, p. 5-2

**Notes:**

- Population projection was calculated in Section 5.9 – Population and Housing
- GPCPD = Gallons per Capital per Day
- 1,273 persons X 266 GCD= 338,618 GCD
- AFY = Acre Feet per Year
- Conversion factor 892. (338,618 ÷ 892.7 = 379.3)
- 

As reflected in **Table 5.14-F** above, implementation of the proposed Project would increase water demands by approximately 379.3 AFY over existing and future conditions in normal, dry, and multiple dry years. However, as identified in **Tables 5.14-B** and **5.14-E** above, RPU’s supplies are larger than existing and projected demands. Thus, the increased demand resulting from the proposed Project would be accommodated.

Further, RPU issued a *Water Service Availability* letter dated May 10, 2023, which indicated that PRU is prepared to offer water service to the proposed Project site upon completion of financial arrangements and compliance with the RPU’s *Rules and Regulations* for the installation of water facilities.

Project landscaping will be required to comply with Riverside Citywide Design Guidelines for Water Efficient Landscape and Irrigation Design Guidelines.

Thus, through regulatory compliance and PDFs, the proposed Project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the impacts would be **less than significant**.

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

The wastewater collection provider for the Project is RPW. Wastewater treatment will be provided for the Project by the RWQCP. As indicated in Section 5.14.5 – Project Design Features above, the Project will implement sewer PDFs which includes 8-inch sewer lateral connections to the existing facilities in Arlington and Streeter Avenues.

The *2020 Sewer Master Plan Update (Master Plan Update)* utilized the City’s 2025 General Plan land use designations to analyze capacity needs of the wastewater system. The Project proposes to change the existing General Plan land use designation from commercial uses to high density residential and commercial. Hence, additional loads associated with proposed land use were used in hydraulic evaluation. (CAROLLO, p. 1).

The *Sewer Study Memorandum* prepared for the proposed Project included both an existing and a future hydraulic evaluation to determine both existing and future capacity of wastewater treatment.

**Table 5.14-G, Project Site Wastewater** below, identifies anticipated wastewater flows that were

anticipated to be produced by the Project site, currently designated as commercial, as part of the *Master Plan Update* as well as flows projected to be produced proposed by the Project.

**Table 5.14-G, Project Site Wastewater**

	Acres	Flow Factor (gpd/ac)	Average Daily Weather Flow (gpd)
Flows Planned by Master Plan Update	17.37	710	12,333
Proposed Residential	14.44	2,800	40,432
Proposed Commercial	2.99	710	2,123
Proposed Project Increased Flows	-	-	30,180
Source: CAROLLO, p. 2			

The proposed Project would result in an increase in the sewer flows anticipated for this site. Hence, a capacity analysis was conducted. The capacity analysis identifies areas in the sewer system where flow restrictions occur or where pipe capacity is insufficient to convey peak wet weather flows (PWWFs). Sewers that lack sufficient capacity to convey peak wet weather flow conditions create bottlenecks in the collection system that can potentially cause sanitary sewer overflows. (CAROLLO, p. 4).

The capacity analysis was utilized to determine if the proposed Project would result in impacts on the existing and planned sewer system. It was also utilized to determine if the recommended sewer improvement projects and pipe sizing identified in the *Master Plan Update*, would be adequately sized to accommodate the proposed Project. (CAROLLO, p. 4).

For the existing sewer collection system, the PWWF conditions were routed through the hydraulic model along with the changes to the point of connections for average dry weather flow (ADWF) and rain derived inflow and infiltration (RDII) in order to verify if the existing system is appropriately sized to convey existing PWWFs plus the additional flows from the proposed land use change. The *Master Plan Update* identified one existing system improvement downstream of the proposed Project. The Easement Trunk Sewer Replacement (Project GM-7) is a gravity Main located along an easement 330 feet North of Mountain View Avenue to Santa Ana River Trail.<sup>1</sup> RPU Project GM-7 outlined in the *Master Plan Update* consists of the replacement of approximately 770 feet of 24-inch diameter pipeline and replacing with a 27-inch diameter pipeline. This improvement has already been identified in the Master Plan Update as an existing need and is in queue for replacement. The proposed replacement of the pipeline will be adequately sized for the proposed change in land use. (CAROLLO, p. 4).

For the future sewer system, the *Master Plan Update* identified one future sewer system improvement downstream of the proposed Project. The New Parallel Trunk to Santa Ana Trunk Sewer (Project GM-34) which will provide approximate 9,160 linear feet of 39-inch diameter pipe (WIMPU, Vol 3, p.7-11). The timing of growth under future conditions is expected to occur within the planning horizon, which is the year 2037<sup>2</sup>. As flows continue to increase in the future, there will be some areas of the collection

- 1 The City of Riverside has approved the Easement Trunk Sewer Replacement Project. Construction is anticipated to commence late 2024.
- 2 The New Parallel Trunk to Santa Ana Trunk Sewer Project GM-34 is a distant future project for allocated for the years 2028-2037 as the Project would mitigate a future deficiency within the existing system.

system that cannot convey the future PWWF without flows exceeding capacity. However, the future capacity evaluation which includes the proposed Project, did not identify new system deficiencies not already identified in the *Master Plan Update* or the existing hydraulic evaluation discussed above. Thus, the hydraulic analysis identified that future sewer system improvements identified in the *Master Plan Update* are adequately sized to accommodate the proposed Project in the future. (CAROLLO, p. 5).

Hence, the analysis concluded that both the existing system and future sewer improvement projects proposed by the *Master Plan Update* are adequate to meet the increased flows of the proposed Project.

Further, as identified in **Table 5.14-C** above, the RWQCP currently treats approximately 28 million mgd of AAF with a hydraulic capacity of approximately 46 mgd AAF. The RWQCP has a projected daily influent flow of approximately 39 mgd through the year 2037 so the RWQCP has capacity to treat the flows of the proposed Project.

Thus, implementation of the proposed Project would result in a determination that the wastewater treatment has adequate capacity to serve the projected demand in addition to their existing commitments because RPW has been shown to have adequate capacity to serve the Project's projected demand in both existing and future conditions. Therefore, impacts would be **less than significant**.

***Threshold: Would the Project 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?***

The Project site is developed and the Project is proposing demolition and reconstruction of the existing site so the following discussion will include an evaluation of the demolition, construction, and operational solid waste.

**Site Demolition Solid Waste**

The Project would entail the demolition of the existing structures, parking lot, trees/vegetation, and existing utility lines. Anything with salvage value that includes steel, metal rebar from footings, old mechanical equipment, etc. will be segregated and recycled. Some material like old plywood with built-up roofing material stuck to it or used carpet may end up in a landfill. However, by weight (tonnage), most of the building and demolition spoils will come from the concrete structure and the paved parking lot. It will be crushed and used as fill and road base on the property and thus diverted from a landfill.

Prior to full demolition, anything such as lead based paint or asbestos containing materials will be stripped and disposed of legally as outlined in Section 5.6 Hazards and Hazardous Materials, by and under the supervision of a qualified environmental remediation company. Anything hazardous is separately bagged and disposed of prior to the main building demolition process.

The Project proposes to crush the existing concrete and asphalt from demolition to a maximum size of six inches and utilize as engineered fill for the basement area. (ALTA, pp. 2-3). The Project site will then be graded. Anticipated earthwork is expected to balance with 28,000 cubic feet (cf) of cut and 28,000 cf of fill. Thus, no solid waste will result from the demolition of existing building and parking lot or during grading activities.

**New Construction Solid Waste**

Construction of the Project would result in the generation of construction-related solid waste. **Table 5.14-H, Project Construction Waste** below, identifies Project's projected contribution to these landfills during construction.

**Table 5.14-H, Project Construction Waste**

<b>Building Type</b>	<b>Building Size (SF)</b>	<b>Generation Rate (lbs/SF)</b>	<b>Total (Tons)<sup>1</sup></b>
Residential	546,474	4.38	<b>1197</b>
Office (Clubhouse/Fitness/Leasing building)	4,409	3.89	<b>9</b>
Commercial	25,320	3.89	<b>49</b>
Total			<b>1,255</b>
<b>Disposal Facility</b>	<b>Yearly In-Take Capacity (tons/year)<sup>2</sup></b>	<b>Project's Yearly Disposal Rate<sup>3</sup></b>	<b>Proposed Project's Contribution to Yearly In-Take Capacity<sup>4</sup></b>
Badlands	1,825,000	654	<b>0.04</b>
El Sobrante	5,859,710	654	<b>0.01</b>
Lamb Canyon	1,825,000	654	<b>0.03</b>
Robert A Nelson Transfer Station & MRF	1,460,000	654	<b>0.04</b>
Source: USEPA, pp. 2-2 – 2-4			
<b>Notes:</b>			
1. (Building Size) X (Generation Rate) = (Total Pounds of Waste), (Total Pounds of Waste X 0.0005 = (Total Tons of Waste) (546,474 SF) X (4.38) = 2,393,556 lbs/sf, 2,393,556 lbs/sf X 0.0005 = 1196.77806 tons (4,409 SF) X (3.89) = 17,151.01 lbs/sf, 17,151.01 lbs/sf X 0.0005 = 8.575505 tons (25,320 SF) X (3.89) = 98494.8 lbs/sf, 98494.8 lbs/sf X 0.0005 = 49.2474 tons			
2. Daily disposal capacity multiplied by 365 days per year.			
3. Total tons divided by years of construction (1.92 years, 23 months =1.92 years)			
4. Yearly Intake / Disposal Capacity x 100			

As mentioned in Section 5.14.1 - Setting above, solid waste produced by the Project would be collected and transported to the Agua Mansa Transfer Station to be sorted and then be transferred to the Badlands Landfill; or waste would be transported directly to the Badlands, El Sobrante, or Lamb Canyon Landfills. The Project will require short-term construction activities resulting in 1,255 tons of construction waste as identified in **Table 5.14-H** above. Under a worst-case scenario, assuming all of the Project's construction solid waste is transferred to the transfer station and one landfill, the Project's contribution to the disposal facilities would be less than 0.05 percent. Hence, the Project's construction solid waste contribution to the transfer station or any of the three landfills during construction activities will be negligible.

**Operational Solid Waste**

The Project is proposing to change the land use designation of the Project site to Mixed-Use which would result in commercial and residential solid waste. Anticipated solid waste during operation is calculated below in **Table 5.14-I, Project Operational Waste** below. One commercial building is speculative as it has no known tenant. The other is proposed as a grocery store so its specific use has been designated in the calculations below.



**Table 5.14-I, Project Operational Waste**

Proposed Land Use		Total (Tons/Year)
Grocery		115
Retail		5
Multi-Family		345
<b>Project's Total Projected Operational Waste</b>		<b>465</b>
Disposal Facility	Yearly In-Take Capacity (tons/year) <sup>1</sup>	Proposed Project's Percent of Yearly Intake <sup>2</sup>
Badlands	1,825,000	0.025
El Sobrante	5,859,710	0.008
Lamb Canyon	1,825,000	0.025
Agua Mansa Transfer Station	1,460,000	0.032
<b>Source:</b> WEBB-A (CalEEMod data for solid waste)		
<b>Notes:</b>		
1. Daily disposal capacity multiplied by 365 days per year.		
2. Total tons / Disposal Capacity x 100		

Based on the results from **Table 5.14-I** above, the Projects contribution to any of the three Landfills during operation will be negligible. The proposed Project's yearly tonnage contribution is less than 0.1 percent of the yearly permitted intake rate for any of the three landfills. Further, these percentages reflect a worst-case scenario as they are based on all waste going to one landfill when in reality, these would likely be split between the three resulting in smaller total contributions.

Pursuant to AB 939, at least 50 percent of the Project's solid waste is required to be diverted from landfills. Non-recyclable solid waste generated during long-term operation of the Project would be disposed of at the El Sobrante, Badlands Landfill, and/or the Lamb Canyon Landfills. All of these landfills receive well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume (CalRecycle). Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at receiving landfills, impacts to regional landfill facilities during the Project's long-term operational activities would be less than significant.

Federal, state, and local statutes and regulations regarding solid waste reductions are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The proposed Project would be required to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and state programs. Additionally, the proposed Project would be required to comply with applicable practices enacted by the City under AB 341 and any other applicable local, state, and federal solid waste management regulations.

Thus, the proposed Project's estimated solid waste generation during demolition, construction, and operation will not generate solid waste in excess of State or local standards, or in excess of

infrastructure capacity because estimated waste will constitute an extremely small proportion of the daily available disposal capacity of any of the landfills. Further, the proposed Project will be required to comply with all existing regulations. Therefore, impacts would be **less than significant**.

### **5.14.8 Recommended Mitigation Measures**

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (State *CEQA Guidelines*, Section 15126.4). Mitigation measures were evaluated for their ability to reduce or eliminate impacts. Because all Project impacts related to utilities and service systems are less than significant, no mitigation measures are necessary.

### **5.14.9 Summary of Project-Specific Environmental Effects After Mitigation Measures Are Implemented**

There are no mitigation measures required to reduce impacts to Utility and Service Systems.

## 6.0 Consistency with Regional Plans

California Environmental Quality Act, Section 15125(d), requires an EIR to discuss any inconsistencies between the proposed Project and applicable general, specific, and regional plans. The purpose of this section is to discuss the proposed Project’s consistency with the regional and local growth forecasts, the Southern California Association of Governments (SCAG) *Connect SoCal 2020-2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)*, and to provide an analysis of the Project’s impacts on the population, housing, and job projections for the region. SCAG is the designated metropolitan planning organization, and as such, is mandated by the federal government to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Additionally, a discussion of the Project’s impacts upon the growth forecasts and its compliance with SCAG’s regional policies is discussed below.

A discussion of the proposed Project’s consistency with the applicable Air Quality Management Plan and Connect SoCal RTP/SCS is addressed in *Section 5.2 - Air Quality* and *Section 5.6 - Greenhouse Gas Emissions*, respectively.

### 6.1 Setting

#### 6.1.1 SCAG Regional Growth Factors

Population forecasts for the City and surrounding area are provided by SCAG, in the 2020-2045 RTP/SCS Demographics and Demographics and Growth Forecast-Technical Report Appendix (SCAG 2020). The RTP growth forecast is updated every four years and it was recently updated in 2020. The SCAG RTP Growth Forecast is broken down into separate growth forecasts for individual cities and unincorporated county areas. **Table 6.0-A, SCAG Growth Forecasts (Riverside)** depicts the SCAG population forecasts for the City, which includes the proposed Project site.

**Table 6.0-A, SCAG Growth Forecasts (Riverside)**

	2016	2045
Population	325,300	395,800
Households	94,500	115,100
Employment	145,400	188,700
Jobs-to-Housing Ratio <sup>1</sup>	1.54:1	1.70:1
Source: SCAG 2020, Table 14		
<b>Notes:</b>		
1. Total number of jobs relative to the total number of households – calculated		
2. 2020, 2035, and 2040 data not available.		

Jobs-to-housing ratio is used as an indicator of how jobs-rich or jobs-poor a community is. SCAG’s April 2001 report titled, *The New Economy and Jobs/Housing Balance in Southern California*, states that a balance between jobs and housing in a metropolitan region can be defined as a provision of an

adequate supply of housing to house workers employed in a defined area (i.e., community or subregion) (SCAG 2001, p.15). Alternately, a jobs/housing balance can be defined as an adequate provision of employment in a defined area that generates enough local workers to fill the housing supply.” Generally, a ratio of less than 1 to 1 indicates a jobs-poor area, and a ratio of more than 1 to 1 indicates a jobs-rich area (SCAG 2001, p. 15). Currently, the City of Riverside has an unemployment rate of 3.5 percent (EDD). As reflected in **Table 6.0-A**, above, the 2020-2045 SCAG growth forecast indicates that in the year 2016 the jobs to housing ratio for the City was 1.54:1, which is by definition indicates a jobs-rich area and anticipated to increase to 1.70:1 by the year 2045.

## **6.2 Related Regulations**

### **6.2.1 Southern California Association of Governments (SCAG)**

The Southern California Association of Governments (SCAG) is the largest Metropolitan Planning Organization (MPO) in the nation. The region covers more than 38,000 square miles and includes six counties: Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial and 191 cities (SCAG 2022). As the designated MPO, SCAG is mandated by federal law to research and develop a Regional Transportation Plan (RTP), which incorporates a Sustainable Communities Strategy (SCS) per California state law (SCAG 2019, p. 1). The SCAG region is a major hub of global economic activity, representing the 16th largest economy in the world, and is considered the nation’s gateway for international trade, with two of the largest ports in the nation (SCAG 2019, p. 1). The region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles (SCAG 2022).

### **6.2.2 Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy**

The SCAG regional council adopted the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) September 3, 2020 (RTP/SCS, p. 12). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The plan charts a path toward a more mobile, sustainable, and prosperous region by making key connections: between transportation networks, between planning strategies and between the people whose collaboration can make plans a reality (RTP/SCS, p. 8). This plan reaffirms zero and near-zero emission technologies as a priority, describes progress to date, and outlines a framework and key action steps to reach that goal (RTP/SCS, p. 78). It outlines more than \$638 billion in transportation system investments over the next 25 year (RTP/SCS, p. 4). The Plan was prepared through a collaborative, continuous, and comprehensive process with input wide range of constituents and stakeholders within the Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura, including public agencies, community organizations, elected officials, tribal governments, the business community, and the general public (RTP/SCS, p. 8). The goals included in RTP/SCS are meant to provide guidance for considering projects within the context of regional goals.

The RTP provides an opportunity to identify transportation strategies today that address mobility needs for the future. The SCS is an element of the RTP that which outlines growth strategies for land use and transportation and help reduce the state’s greenhouse gas emissions from cars and light duty trucks, a requirement put in place by the passage of Senate Bill (SB) 375 with the goal of ensuring that the SCAG region can meet its regional greenhouse gas reduction targets set by the California Air Resources Board



(CARB) (RTP/SCS, p. 9). CARBs targets for the SCAG region, which were updated in 2018, are 8 percent below 2005 per capita emissions level by 2020 (this target was unchanged), and 19 percent below 2005 per capita emissions level by 2035 (this was increased from 13 percent below 2005 per capita emissions levels by 2035) (RTP/SCS, p. 138). The regional targets were updated to ensure consistency with the more stringent statewide reduction goals subsequently introduced by the California legislature (RTP/SCS, p. 38). The SCS has been found to meet state targets for reducing GHG emissions from cars and light trucks. The RTP/SCS achieves per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, and 19 percent in 2035, thereby meeting the GHG reduction targets established by the CARB for the SCAG region (RTP/SCS, p. 48).

### 6.3 Consistency Analysis

In March 2021, SCAG adopted the Regional Housing Needs Assessment (RHNA) 6<sup>th</sup> Cycle for the planning period of October 2021 through October 2029. The RHNA identified new housing units needed by income category for the region, including the City of Riverside. The City has been allocated to provide 18,458 new housing units by the RHNA. However, as part of the City Phase I General Plan Update (GPU) which includes the 6<sup>th</sup> Cycle Housing Element for the planning period of 2021-2029, adopted in October 2021, the City added a self-prescribed buffer of new dwelling units to provide during this planning period to ensure the City meets the minimum recommended by State Department of Housing and Community Development to account for the “No Net Loss” requirements as mandated by Senate Bill 166 (SB 166). The City elected to provide a an approximately 30 percent “No Net Loss” buffer and so will target providing 24,000 new homes. (GPU, p. 3.9-12). The vacancy rate in the City has been steadily decreasing each year since 2010 and currently sits at 4.0 percent. (DOF).

In October 2021, the City adopted Phase I General Plan Update (GPU) which consisted of the 6<sup>th</sup> Cycle Housing Element (2021-2029). The GPU identified that according to SCAG, the population of the City is projected to increase to 395,800 by 2045, which represents an increase of 20.61 percent from the 2020 population of 328,155 (GPU, p. 3.9-17). However, based on DOF population and housing estimates, the City’s average household size was 3.28 persons. The GPU utilized the more conservative DOF generation rate of 3.28 persons which projected an increase of 103,530 persons resulting in a total population projection of 431,685 persons by 2045; 67,645 persons more than the SCAG projection. The GPU utilized the more conservative population estimate of 431,685 persons in its analysis and determined that no mitigation was available to reduce the impact of unplanned population growth to a less than significant level so the impacts would be significant and unavoidable. The proposed Project includes a rezone and a general plan amendment to change the designation to Mixed-Use Village to allow for residential use. Implementation of the Project would allow for a total of 388 residential dwelling units resulting in a population increase of 1,273 persons<sup>1</sup>. This increase represents growth that is less than one percent of the more conservative population projections analyzed by the GPU that projected 67,645 more persons than SCAG projections. . Additionally, the Project will provide the City more opportunities to help reach the RHNA allocation of 18,458 for the planning period for 2021-2029 and the City’s self-prescribed target of 24,000 units. (RHNA).

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1. Based on household generation factor of 3.28 people per dwelling unit for the City of Riverside (GPU FEIR, p. 3.9-5).

**Table 6.0.-B, Proposed Project Consistency with the Connect SoCal 2020-2045 RTP/SCS Goals,** presents a side by side comparison of the Connect SoCal 2020-2045 RTP/SCS Goals and a discussion regarding the Project’s consistency, non-consistency, or non-applicability with each goal.

**Table 6.0-B, Proposed Project Consistency with the Connect SoCal 2020-2045 RTP/SCS Goals**

Goal	Analysis
<p>Connect SoCal Goal1: Encourage regional economic prosperity and global competitiveness.</p>	<p><b>Consistent:</b> The proposed Project would involve construction of new commercial uses that would satisfy the needs of commercial occupiers in the area and would be competitive with similar commercial-retail areas in the Inland Empire marketplace</p>
<p>Connect SoCal Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods</p>	<p><b>Not Applicable:</b> The Project does not propose changes to the existing transportation system. The Project Site is currently served by the RTA, both Route 12 and Route 15 sever the Project area. Route 12 travels along Streeter Avenue and Route 15 travels along Arlington Avenue. Route 15 connects to two Metrolink Stations within the City of Riverside; the Riverside-Downtown Metrolink station and the La Sierra Metrolink Station.</p>
<p>Connect SoCal Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.</p>	<p><b>Not Applicable:</b> The Project does not propose changes to the existing transportation system. However, as discussed above under Connect SoCal Goal 2, the Project Site is in proximity RTA routes and Metrolink trains that provide connectivity to adjacent jurisdictions.</p>
<p>Connect SoCal Goal 4: Increase person and goods movement and travel choices within the transportation system.</p>	<p><b>Consistent:</b> The Project does not directly entail the movement of persons or goods. However, as discussed under Connect SoCal Goals 2 and 3, the Project Site is in proximity to RTA routes that connect Metrolink to provide connectivity to adjacent jurisdictions and agencies.</p>
<p>Connect SoCal Goal 5: Reduce greenhouse gas emissions and improve air quality.</p>	<p><b>Consistent:</b> The reduction of energy use, improvement of air quality, and promotion of more environmentally sustainable development would be encouraged through the development of alternative transportation methods (pedestrian sidewalk), green design techniques for buildings, solar, and other energy-reducing techniques. The Project is required to comply with the provisions of the California Building and Energy Efficiency Standards (Title 24 of the California Code of Regulations; CEC 2022) and the California Green Building Standards Code (CALGreen; Part 11 of Title 24). Title 24 standards would reduce project-related energy usage (30 percent reduction for</p>

**Table 6.0-B, Proposed Project Consistency with the Connect SoCal  
2020-2045 RTP/SCS Goals**

Goal	Analysis
	<p>nonresidential uses) when compared to the 2016 standards.</p> <p>The Title 24 standards are updated every three years and become more stringent with each update; therefore, complying with the latest Title 24 standards would make the proposed Project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards.</p> <p>The Project will maximize the protection of the environment and improvement of air quality by coordinating with local transit services to ensure any required transit connections are included within the Project.</p> <p>Furthermore, due to the location of the Project site and its' proposed Mixed Use, the Project will allow residents to grocery shop, dine, and shop within walking distance.</p>
<p>Connect SoCal Goal 6: Support healthy and equitable communities.</p>	<p><b>Consistent:</b> The Project implements additional housing and commercial uses within one site. This Project aims to increase the variety of housing options within the neighboring residential area, along with integrating commercial uses keeping with the character of the existing area and offering an outdoor dog park for community use. Implementation of the Project would direct support to healthy and equitable communities.</p> <p>As further detailed <i>Section 5.2 – Air Quality</i>, the proposed Project will be consistent with Federal and State Ambient Air Quality standards and with mitigation, the proposed Project would not substantially impact nearby sensitive receptors. Additionally, <i>Section 5.9 – Noise</i> indicates that with mitigation, the proposed Project would be consistent with local and state noise standards and would not substantially impact nearby sensitive receptors. Moreover, implementation of the proposed Project would provide local residents with employment opportunities.</p>
<p>Connect SoCal Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.</p>	<p><b>Consistent:</b> Redevelopment of the Project site is categorized as an infill development that will provide new uses to a site that has been abandoned. Thus, the Project will not result in a greenfield development.</p> <p>Although the Project does not propose any changes to the transportation system, as discussed under Goals 2 and 3, the Project Site is in proximity to RTA routes and Metrolink trains that provide connectivity to adjacent jurisdictions.</p>

**Table 6.0-B, Proposed Project Consistency with the Connect SoCal 2020-2045 RTP/SCS Goals**

Goal	Analysis
	<p>The proposed Project will support the regional and transportation network by payment of fair share fees pursuant to City MC 16.68 for payment of – Western Riverside County Transportation Uniform Mitigation Fee Program identified in <i>Section 5.12 - Transportation</i>.</p>
<p>Connect SoCal Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel</p>	<p><b>Not Applicable:</b> This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning of the transportation system. The proposed Project would not have an adverse impact on or otherwise affect efficient travel.</p>
<p>Connect SoCal Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.</p>	<p><b>Consistent:</b> As discussed under Connect SoCal Goal 6, the Project will implement residential and commercial uses within one location. This Project aims to increase the variety of housing options within the neighboring residential area, along with integrating commercial uses keeping with the character of the existing area and offering an outdoor dog park for community use. Existing transportation systems are already in place that provide connectivity to adjacent jurisdictions.</p>
<p>Connect SoCal Goal 10: Promote conservation of natural and agricultural lands and restoration of critical habitats.</p>	<p><b>Not Applicable:</b> The Project site is not within agricultural lands nor is with within an area that requires restoration of critical habitats.</p>
<p>Source: Goals are identified in RTP/SCS, p. 9</p>	

The table above identifies that the proposed Project would be consistent with all applicable SCAG’s Connect SoCal policies. Consistency or inconsistency with SCAG regional policies does not result in physical changes to the environment and therefore, no significant effects on the environment.



## 7.0 Other CEQA Topics

The State *California Environmental Quality Act (CEQA) Guidelines* set forth several general content requirements for Environmental Impact Reports (EIRs). Those applicable to this Project include cumulative impacts (Section 15130), unavoidable adverse impacts (Section 15126(b)), growth inducing impacts (Section 15126(d)), and significant irreversible impacts (Section 15126.2(c)). This section addresses each of those general requirements.

### 7.1 Cumulative Impact Analysis

#### 7.1.1 Introduction

CEQA requires that an EIR examine the cumulative impacts associated with a project, in addition to project-specific impacts. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (State CEQA Guidelines § 15130(b)).

As stated in the State CEQA Guidelines, an EIR “shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable (§ 15130(a)). “Cumulatively considerable” means that “the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects as defined in Section 15130” (§ 15065(c)). Section 15355 of the State CEQA Guidelines states that “cumulative impacts” occur from “...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine “reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project” (State CEQA Guidelines §§ 15130(a)(3) and 15130(b)(5)).

State CEQA Guidelines Section 15130(b)(1) requires that a discussion of cumulative impacts be based on either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Section 15130(d) of the State *CEQA Guidelines* states that, “Previously approved land use documents such as general plans, specific plans, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.” Additionally, if a cumulative impact was adequately addressed

in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact. (Section 15130(e) of the State *CEQA Guidelines*)

The “summary of projections method” is utilized as the cumulative impact analysis is based on information contained in the City of Riverside General Plan (GP) and Draft Environmental Impact Report, SCH No. 2004021108 (GP DEIR), certified by the City Council in 2007 Resolution No. 21535. This document is hereby incorporated by reference. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiered and program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have been adequately addressed, as defined in section 15152(f), in a certified EIR for that plan.” Additionally, if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact (State CEQA Guidelines § 15130(e)).

In those instances where the “list method” approach is used in the cumulative analysis, the analysis focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of combined impacts caused by other past, present, or future projects. The cumulative impact scenario considers other projects proposed within the Project area that have the potential to contribute to cumulatively considerable impacts. The list of projects considered in this analysis includes development projects provided by the City of Riverside that were evaluated in the Project-specific Traffic Impact Analysis and are shown in **Table 7.0-A, Cumulative Development Projects**. The locations of these cumulative projects in relation to the Project site are shown in **Figure 7.0-1, Cumulative Development Projects**.

**Table 7.0-A, Cumulative Development Projects**

Identification	Project Name	Land Use	Quantity of Units <sup>1</sup>
R1	PR-2021-001198	Manufacturing	25,250 TSF
		General Office	40,000 TSF
R2	P20-0429 / P20-0430 / P20-0431 / P20-0432 / P20-0433	Convenience Store	4,750 TSF
R3	P20-0044	Office / Warehouse	3,256 TSF
R4	P19-0874	Office / Warehouse	3,600 TSF
Source: URBAN, Table 4-3			
<b>Notes:</b>			
1. Units are in Thousand Square Feet (TSF)			

H:\2022\22-0172\CIS\PRO\traffic\_transportation\traffic\_transportation.aprx Map created 28 Jul 2023



Source: Traffic Analysis Dec. 23, 2022.

**Figure 7.0-1 Cumulative Development Projects**  
Arlington Mixed Use

NTS

### 7.1.2 Cumulative Analysis Setting

The geographic scope (or cumulative impact area) used for each environmental issue is different depending upon the potential area of effect. For example, the geographic scope for air quality would be the South Coast Air Basin (Basin), while the geographic scope for cumulative aesthetics impacts would be the viewshed, and the geographic scope for traffic/circulation would be the roadways in the Project vicinity that could be affected by the cumulative projects.

### 7.1.3 Aesthetics

Utilizing the summary of projections method, the geographic scope for impacts related to aesthetics consists of the viewshed surrounding the Project site. The area immediately surrounding has a General Plan Land Use Designation of O - Office, C - Commercial, PF - Public Facility, MDR - Medium Density Residential, MHDR - Medium High Density Residential and HDR - High Density Residential. Thus, the surrounding urbanized area consists of a mix of commercial uses, single family residential units, public facilities and office buildings. The proposed Project does not exceed a building height of 41.25 feet of which only 36 feet will be habitable area. It should be noted that the existing structure already stands at 36 feet high. Thus implementation of the Project would not drastically alter the existing site views. Considering the Project's location and its surroundings, the Project would integrate all surrounding uses into one site as a mixed development. Therefore, the project would not implement a use that is not represented in the surrounding area.

For cumulative development to contribute to a significant cumulative impact on aesthetics, those cumulative development projects typically must be contiguous to the Project site and/or be located within the same viewshed, i.e., viewable from the same points as the Project. As the surrounding project area is already built and urbanized, there are no development projects contiguous to the Project site.

The nearest cumulative projects within the City represent projects and the associated visual character of these projects, including sources of potential light and glare during day and nighttime, will not contribute to a cumulatively considerable aesthetic impact to the Project area due to their distance from the Project site and each other. Further, although all of the cumulative development projects are anticipated to include lighting for security / and/or decorative purposes, all lighting associated with the cumulative development projects will be installed per the standards and policies of the City. These standards are intended to protect the views of the nighttime sky by requiring all lighting to be directed downward and away from adjacent properties and the sky.

Thus, there are no known or foreseeable development projects close enough to the Project site to contribute to a cumulatively considerable and significant impact on aesthetics. Therefore, cumulative impacts are **not significant**.

### 7.1.4 Air Quality

The cumulative impact for analysis for air quality employs the summary of projections approach because the dispersion of air pollutant emissions is influenced by an area larger than the list of cumulative projects. Utilizing the summary of projections method, due to the defining geographic and meteorological characteristics of the Basin, the cumulative area for air quality impacts is the Basin itself. As previously stated in Section 5.2 - Air Quality of this Draft EIR (see **Table 5.2-D**), the portion of the



Basin within which the Project is located is designated as a non-attainment area for ozone (O<sub>3</sub>) and particulate matter less than 2.5 microns in size (PM-2.5) under both State and federal standards and for particulate matter less than 10 microns in size (PM-10) under State standards.

The South Coast Air Quality Management District (SCAQMD) considers the thresholds for project-specific impacts and cumulative impacts to be the same (see Section 5.2-24). Consequently, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. Project emissions within the context of SCAQMD's regional emissions thresholds provide an indicator of potential cumulative impacts within the Basin. Cumulative localized impacts for pollutants are also considered and reflect Project air pollutant emissions in the context of ambient conditions in the Project vicinity.

As discussed in Section 5.2 – Air Quality of this Draft EIR, the Project's operational emissions do not exceed regional SCAQMD thresholds, and no mitigation was required.

Thus, the proposed Project's cumulative contribution to air quality impacts is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

### 7.1.5 Cultural Resources

Utilizing the summary of projections method, the geographic scope for cumulative impacts to cultural resources is defined by the cultural setting and territory of the prehistoric and historic people who occupied the area of southern California in which the City is located. Western Riverside County was part of the territory of the Cahuilla and perhaps Luiseño people. Cumulative projects in the Project area and other development in western Riverside County could result in the progressive loss of as-yet unrecorded archaeological resources. This loss, without proper mitigation, would result in an adverse cumulative impact.

With respect to historic resources, the Project would demolish a potentially historic structure which is one of only two structures in the City designed by Charles Luckman that represent the Mid-Century Modern style of Architecture for a department store. According to the City's Historic Resources Inventory list there are approximately 89 properties throughout the City that represent mid-century, and or modern architectural styles, excluding residential properties. Thus, removal of existing structures at the Project site would account for a reduction of approximately one percent of mid-century and or modern structures throughout the City. While the Project would be required to implement of mitigation measure **MM CR-1** requiring preparation a Historic American Building Survey (HABS) to document the historic nature of the structure and will implement PDFs that incorporate architectural elements that acknowledge the history of sites Mid-Century Modern architecture, the loss of the structure will result in a significant impact to a historic resource as well as be inconsistent with General Plan policies HP-1.3 and HP-5.1.

With respect to archaeological resources, the Project would be required to comply with the City's applicable General Plan resource protection requirements and conditions of approval. Cumulative projects within the City have the potential to impact cultural resources. However, to reduce impacts to archaeological resources, cumulative development projects within the Project vicinity will be required to comply with the resource protection requirements of the City's General Plan, as applicable. Thus, cultural resource reports will be required for each individual cumulative development project to assess the potential for significant impacts to these resources and to identify mitigation measures if necessary.

Additionally, all cumulative development projects, as well as the proposed Project, will be required to comply with state code and as discussed in Section 5.3 – Cultural Resources of this Draft EIR, with implementation of mitigation measures **MM CR-2** through **MM CR-5**, the proposed Project would result in less than significant impacts to archaeological resources. Likewise, as discussed in the City's General Plan EIR, cumulative development projects within the City will have a less than significant impact to archaeological resources.

Therefore, due to the loss of a historic resource which also results in an inconsistency with General Plan policies related to historic resources, cumulative impacts are **significant and unavoidable** and a **statement of overriding consideration** would be required to be adopted by the City prior to project approval.

### 7.1.6 Energy

Utilizing the summary of projections method, the geographic scope for cumulative impacts to energy is defined by the boundaries of Riverside Public Utilities (RPU) for electricity and Southern California Gas (SCG) for natural gas. The Project's energy use includes electricity and natural gas usage as well as transportation-related energy (fuel). Energy impacts are cumulative in nature. RPU's service area encompasses most of the City. SCG's service area encompasses most of central and southern California.

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted building standards consistent with Title 24.

Fuel consumption from cars and trucks on the roadway network are also regulated at the State level. Pavley, Low Carbon Fuel Standards (LCFS), and Advanced Clean Cars reduce emissions and increase fuel efficiency. Assembly Bill (AB) 1493 ("the Pavley Standard") requires reduction in GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 and thereafter. Executive Order S-01-07 went into effect in 2010 and required a reduction in the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. It imposes fuel requirements on fuel that will be sold in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California. The Advanced Clean Cars I and II program, first introduced in 2012, combines the control of smog, soot causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2035. Residents, employees of, and deliveries to the proposed Project site will utilize these vehicles as they become available. The cumulative development projects are also subject to these same regulations.

The proposed Project will comply with Title 24 standards for insulation, glazing, lighting, shading, and water and space-heating systems in all new construction. The Project will also comply with the California Green Building Standards Code (CALGreen), which implements sustainable construction practices that reduce negative impacts on the environment through planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Through the use of modern energy-efficient construction materials and practices, in addition to

compliance with Title 24 standards, the proposed Project will be consistent with the State's energy conservation standards and, therefore would not conflict with an adopted energy conservation plan.

The analysis presented in Section 5.4 – Energy of this Draft EIR, is cumulative in nature. Thus, if an individual project does not result in wasteful or indifferent energy use, potential cumulative impacts of that project are not cumulatively considerable. As described in the analyses, the Project would not result in the unnecessary, inefficient, or wasteful use of energy resources nor would it conflict with or obstruct a state or local plan for increasing renewable energy or energy efficiency.

Thus, the proposed Project's contribution to energy is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

### 7.1.7 Greenhouse Gas Emissions

GHGs are those gases that will contribute to global climate change; therefore, the cumulative impact area for GHG emissions is the earth's atmosphere. Implementation of the proposed Project along with the cumulative development projects will contribute GHG emissions to the atmosphere.

It is important to note that the scope of the City's jurisdictional authority is limited to certain types of emissions generated within the City's physical boundaries. The City's authority does not include the regulation of the majority of actions including, for example: transportation policy, fuel consumption, and energy generation, which the State has determined are necessary to meet all of its GHG reduction goals. Further, some of the GHG emissions associated with the Project can be reduced only by measures to be implemented by other governmental agencies.

As discussed in Section 5.5 – Greenhouse Gas Emissions of this Draft EIR, the Project would contribute GHG emissions to the cumulative condition. Equipment and vehicles used during construction (e.g., on-road motor vehicles and heavy-duty construction equipment) and operations (i.e., vehicle trips, electricity consumption, and waste generation) would result in a net increase in GHG emissions over existing conditions and over the numeric threshold used by the City. Implementation of the Project would result in approximately 7,374.37 metric tons of carbon dioxide equivalents per year (MTCO<sub>2</sub>E/yr), which exceeds the 3,000 MTCO<sub>2</sub>E/yr draft threshold for non-industrial projects utilized by the City for the purpose of evaluating the GHG impacts associated with proposed general development projects. As such, the Project will generate a substantial amount of GHG emissions even after implementation of mitigation and Project design features. However, the Project will comply with existing regulations that reduce GHG emissions (i.e., Title 24, CALGreen code) and would not conflict with or obstruct implementation with Statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.

Thus, the proposed Project's contribution to greenhouse gas emissions is cumulatively considerable. Therefore, cumulative impacts are **significant and unavoidable** and a **statement of overriding considerations** would be required to be adopted by the City prior to Project approval.

### 7.1.8 Hazards and Hazardous Materials

Under the summary of projections method, the geographic scope for hazards relative to the release of hazardous materials into the environment are largely site-specific. Each Cumulative Development Project within the City and surrounding areas are required to follow all federal, state, and local laws and

regulations regarding hazardous materials and other hazards. As explained in Section 5.6 – Hazards and Hazardous Materials implementation of the proposed Project would be required to comply with mitigation measures **MM HAZ-1** and **MM HAZ-2** in order to reduce impacts from existing residual petroleum and chlorinated solvents. Through implementation of regulatory requirements and mitigation measures **MM HAZ-1** and **MM HAZ-2** the Project would not cumulatively contribute to impacts resulting from the release of hazardous materials into the environment.

Utilizing the summary of projections method, the geographic scope for hazards relative to airports is the City, its sphere of Influence, and RCALUP. Cumulative impacts on airport land use plans and private airstrips are measured by the build-out of the General Plan. Airport authorities and other agencies regulate aircraft activity. A portion of the City is located within proximity to Riverside’s Municipal Airport. The State Aeronautics Act of the California Public Utilities Code establishes statewide requirements for the airport land use compatibility planning and requires nearly every county to create an Airport Land Use Commission (ALUC) or other alternative. Airport operations and their accompanying noise and safety hazards require careful land use planning on adjacent lands to ensure the safety of residents and passengers alike, and to protect the City’s businesses and property owners to the greatest extent possible from the potential hazards that could be created by operations from Riverside Municipal Airport, especially by arriving and departing flights that fly over the portion of the City within close proximity to the Riverside Municipal Airport. Implementation of the proposed Project is inconsistent with Riverside County Airport Land Use Plan (RCALUP) that was created by ALUC. The Project is proposing a General Plan Amendment to the City’s General Plan and a Rezone in order to allow for mixed development uses on the Project site that will conflict increase site density and intensity and as such, will be inconsistent with Airport Land Use policies and General Plan policies related to airport compatibility. As a result, the Project will cumulatively contribute to impacts regarding safety hazards with regard to airport land use compatibility.

Thus, the proposed Project’s contribution to hazards and hazardous materials is cumulatively considerable. Therefore, cumulative impacts are **significant and unavoidable** and a **statement of overriding considerations** would be required prior to Project approval.

### 7.1.9 Land Use

Utilizing the summary of projections method, the geographic scope for land use and planning are the adjacent cities of Jurupa Valley and Moreno Valley, and the County of Riverside for the development projected under the buildout of their respective general plans. Cumulative land use impacts would result if growth resulting from the proposed Project would conflict with land use plans and/or policies, or state planning initiatives. Cumulatively, the Project will allow for higher density residential development amid other future development projects within the City and region that may impact existing land uses within the area. The proposed Project would amend the General Plan and re-zone the site so would modify regulations governing land use and development in the City. The proposed Project does not propose to modify or revise any of the existing specific plans within the City and as such will not conflict with those local plans. As discussed in Section 6.0 – Consistency with Regional Plans of this DEIR, the proposed Project is consistent with the 2020-2045 SCAG RTP/SCS. Because the proposed Project would be consistent with and/or supplement adopted plans and regulations governing land use and development in the region, it would not make a considerable contribution to cumulative impacts.

While the Project would represent a shift in land use policy for the site, the Project would not impact adjacent development and is representative of the surrounding land use pattern. Hence, the Project



would not result in a substantial alteration to the planned land use of an area. Further, the Project is consistent with State planning initiatives, such as SB 2, SB 9, and SB 743. As the proposed Project is consistent with these planning initiatives, the proposed Project's impacts to land use and planning would not be cumulatively considerable.

However, the Project will result in an inconsistency with the general plan policies related to airport land use because of the projects inconsistency with Riverside County Airport Land Use Plan policies so will result in significant and unavoidable impacts. Thus, the proposed Project's contribution to land use and planning is cumulatively considerable. Therefore, cumulative impacts are **significant and unavoidable** and a **statement of overriding considerations** would be required prior to Project approval.

### 7.1.10 Noise

Utilizing the summary of projections method, the geographic scope for construction and operational noise and vibration impacts is the immediate vicinity of the Project site because noise and vibration by definition are a localized phenomenon, which drastically reduces in magnitude as the distance from the sources increases. Consequently, only those cumulative projects within the immediate vicinity of the Project will be likely to contribute to cumulative noise and vibration impacts resulting from construction or operation. Standard conditions of approval for future implementing projects will ensure no unnecessary temporary noise would impact nearby uses.

Any potentially significant cumulative impacts from construction-related Project noise will be reduced to less than significant as the Project and other cumulative projects would be required to comply with the regulations identified in Section 5.8 – Noise of this Draft EIR.

Cumulative noise impacts may occur when Project-related vehicular trips are combined with vehicular trips from the cumulative projects. This noise may be perceived by receptors along the nearby roadways near the Project site. Therefore, the geographic scope for cumulative traffic noise are the roadway segments that will be used by Project-related traffic. The cumulative traffic noise condition is the Future Buildout (2045) with Project traffic. As indicated in Section 5.8 – Noise, traffic noise increase from the Project results in less than 1 dBA CNEL and would not be perceptible to the average person so is considered less than significant.

The proposed Project's contribution to noise would be less than significant with mitigation and is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

### 7.1.11 Population/Housing

Utilizing both the list and summary of projections method, the geographic scope for population and housing is the City of Riverside. Cumulative impacts related to population and housing resources are based upon projected development under the City General Plan. Implementation of the proposed Project and cumulative development projects may contribute to significant cumulative impacts to population and housing if they would induce substantial population growth or displace substantial numbers of existing housing units requiring the construction of replacement housing. Implementation of the Project will not displace any existing housing. As discussed in Section 5.10 – Population and Housing implementation of the Project would not result in a significant growth to the area, as the general plan for the City of Riverside had analyzed estimated projections that are greater than that proposed by

the Project. Additionally, the Cumulative Development Projects identified in **Table 7.0-A** do not propose residential uses.

Indirect population growth may indirectly induce population growth in the short term and long term because of new employment opportunities. However, it is anticipated that the extent to which the new jobs are created by cumulative development projects are filled by existing residents in nearby surrounding areas. Based on Section 6.0 – Consistency with Regional Plans, Southern California Association of Governments (SCAG) adopted the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) which anticipated the City's population growth in 2045 to be 395, 800 persons and employment to increase to 188,700 in 2045. The Phase I General Plan Update (GPUI) acknowledged SCAG's projections however, utilized a more conservative approach and projected a population of 431,685 by 2045; projecting a higher buildout population than SCAG's SoCal RTP/SCS projections (GPUI, p. 3.9-17). Further, while the Project would incrementally increase the City's buildout population, it would contribute less than one percent which is not considered significant. Thus, the proposed Project's contribution to population/housing is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

### 7.1.12 Public Services

Public services include fire protection, police protection, libraries, and schools. Utilizing the summary of projections, the geographic scope for public services is the service area of each of the service providers as discussed in Section 5.10 – Public Services of this Draft EIR.

Riverside Fire Department (RFD) provides fire protection for the City. RFD's major facilities include 14 fire stations throughout the City, administration and prevention offices, an Emergency Operations Center, and a training center. Riverside County Fire Department provides service to the unincorporated territory within the City's Sphere of Influence. The Riverside Police Department (RPD) provides police protection services to the City from four stations. The City is served by two public school districts: Riverside Unified School District, which has 47 schools, and Alvord Unified School District, which has 23 schools. There is also one charter school serving the City: River Springs Charter. Riverside Public Libraries maintain eight existing libraries that serve the City. Four university and college libraries also serve the City.

As additional development occurs within the geographic context, there would be an overall increase in the demand for public services, which could cause physical deterioration of existing facilities. However, implementation of the Project would be consistent with the Public Safety Element of the City's 2025 GP. Increases in demand are routinely assessed by fire and law enforcement agencies as part of the budgeting processes so are anticipated to be adequate to accommodate future growth in the City. These assessments are partially accomplished through collection of development impact fees. Similarly, school districts routinely assess increases in growth and would ensure that there would be sufficient school facilities to accommodate associated population growth through collection of development impact fees. Other cumulative projects in the region would also require collection of development impact fees to accommodate increases in demand for public services. These fees would be utilized to help fund construction of required new or expanded facilities, and the impacts of such development would be analyzed at a project-specific level.

Thus, the proposed Project's contribution to public services is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

### 7.1.13 Recreation

Utilizing the summary of projections method, the geographic scope for recreation is the City of Riverside. The Project consists of the addition of approximately 388 new dwelling units and as such, would increase population leading to an increased need for parks and recreational facilities. However, the proposed Project will include a pool and clubhouse for resident use as well as pedestrian promenade, dog park and other open spaces for public use. Nonetheless, Project would still be required to comply with MC Chapter 16.60 – Local Park Development Fees to help reduce impacts to parks and recreational facilities. Cumulative development may result in impacts to local city parks and regional parks. However, all new development will be required to comply with applicable fees and regulations to mitigate impacts of the new development. Cumulative projects would be required to meet Quimby requirements, comply with parkland dedication mitigation fees required by the City’s MC Chapter 16.60.

Thus, the proposed Project’s contribution to recreation is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

### 7.1.14 Transportation

Utilizing both the list and summary of projections method, the geographic scope for transportation is the City of Riverside. The City is connected regionally by California State Route 91 (SR-91) and SR-60, Interstate 215 (I-215) and I-15. Both SR-91 and SR-60 are major east-west interregional facilities that extend from the beach cities in Los Angeles County to the Inland Empire. Both I-215 and I-15 are north-south interstate routes that provides access to Temecula and San Diego County. The roadway network within the City consists of freeways, boulevards, arterials, collectors, and local streets. The roadway network classifications were developed to guide long range transportation planning within the City to balance access and capacity.

The project-specific TIA identified that under Horizon Year (2045) Without Project traffic conditions, the following study area intersection is anticipated to operate at an unacceptable LOS during one or more peak hours:

- California Avenue & Arlington Avenue (#7) – LOS E AM peak hour only

The project-specific TIA identified that the Project is not anticipated to result in any new deficiencies from those identified under Horizon Year (2045) Without Project traffic conditions. The intersection of California Avenue & Arlington Avenue (#7) is not anticipated to increase the delay by 2 seconds or more. Additionally, the deficiency at this location is for the northbound movement. The proposed Project driveway on the north leg is anticipated to operate at an acceptable LOS C.

Traffic projections for Horizon Year (2045) with Project conditions were derived from the latest Riverside Transportation Analysis Model (RIVCOM). The Horizon Year (2045) conditions analysis was utilized to determine if improvements funded through regional transportation fee programs, such as the Development Impact Fee (DIF) program or Western Riverside Council of Governments (WRCOG) Transportation Uniform Mitigation Fee (TUMF), or other approved funding mechanisms can accommodate the long-range cumulative traffic at the target level of service (LOS) identified by the City of Riverside. Other improvements needed beyond the “funded” improvements (such as localized improvements to non-DIF facilities) are identified as such. (URBAN, p. 4).

CEQA Guidelines Section 15064.3 requires that the determination of significance for transportation impacts be based on VMT instead of a congestion metric such as LOS. The change in the focus of transportation analysis is the result of SB 743, as outlined in Section 5.12 – Traffic and Transportation of this Draft EIR. While LOS is not a determining factor of consideration, the City does include GP policies related to LOS. As such, in the cumulative project condition, the Project remains inconsistent with GP policy.

The Project site is in TAZ 2022, which is located in a low VMT generating area. Due to the Project site being located in a low VMT generating area, the Project site was screened out from further VMT analysis for the residential portion. The retail portion of the Project was analyzed separately, however due to the square footage of the commercial area being less than 50,000 (SF) the Project site was considered a local-serving Project. Hence, is screened from further VMT analysis so is not considered to contribute cumulatively.

The precise timing of future development that would occur to reach General Plan buildout cannot be determined presently because of the complex nature of land development. It is anticipated that as development proceeds, each development will pay for and construct GP level road improvements on roads adjacent to the development sites and would pay “fair share” fees, development impact fees (DIF) or regional transportation fees for use by local jurisdictions to construct road improvements necessary to address the cumulative impact of area-wide development. However, the timing of road improvements needed to improve levels of service on a regional basis would be determined by City of Riverside based upon need and the availability of funding.

The priority and timing of these road improvements cannot be determined at this time, nor are they under the sole control of the project proponent and in case of other jurisdictions, the City, to implement. Hence, it is possible that the required improvements will not be constructed in time to mitigate the Project’s cumulative impacts upon off-site intersections and roads to below the level of significance.

Thus, even after paying DIF and regional County Traffic Uniform Mitigation Fees (TUMF) to offset any regional traffic related deficiencies, while the Project’s cumulative traffic-related impacts would be reduced to less than significant, impacts would remain significant until such time as the improvements are completed. Further, the above mentioned intersection would continue to operate at an unacceptable LOS until improvements are completed, which would conflict with General Plan policies addressing the circulation system in the cumulative condition. Because of the uncertainty of when improvements would be implemented in relationship to project development and since cumulative conditions would be inconsistent with General Plan Circulation policies, impacts are cumulatively considerable.

Therefore, impacts are **significant and unavoidable** and a **statement of overriding consideration** would be required to be adopted by the City prior to project approval.

### 7.1.15 Tribal Cultural Resources

Utilizing the summary of projections method, the geographic scope for cumulative impacts to tribal cultural resources (TCR’s) is defined by the cultural setting and territory of the prehistoric and historic people who occupied the area of southern California in which the City is located. The Project area is situated within Western Riverside County as part of the territory of the Cahuilla and perhaps Luiseño people. Cumulative projects in the Project area and other development in western Riverside County may



result in the progressive loss of as-yet unrecorded archaeological resources. This loss, without proper mitigation, would result in an adverse cumulative impact.

As identified in Section 5.13 – Tribal Cultural Resources of this Draft EIR, no known significant Native American historic or archaeological resources are located on the Project site or in the Study Area and the Project is not located on any known cemetery so is not expected to disturb any human remains. Site preparation and construction activities associated with the cumulative development projects may result in cumulative impacts to TCR's if any of these resources are present and no documentation, consultation, or preservation were being implemented throughout the region. However, implementation of mitigation measures **MM TCR-1** through **MM TCR-4** will reduce potential impacts to Native American resources during ground disturbing activities. Further, in the unlikely event of the discovery of human remains on the Project site, all activities in the vicinity of the remains shall cease and the contractor shall notify the County Coroner immediately, pursuant to California Health & Safety Code Section 7050.5 (HSC 7050.5) and California Public Resource Code Section 5097.98 (PRC 5097.98).

Since all local jurisdictions, including the City, are subject to local, State, and federal laws, including CEQA, cumulative impacts to cultural resources are less than significant. Potentially significant impacts are also reduced by utilizing the site development permit process, the CEQA process for individual projects, and the notification and consultation requirements of AB52 and SB18.

Thus, the proposed Project's contribution to TCR's is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

### 7.1.16 Utilities and Service Systems

Utilizing the summary of projections method, the geographic scope for cumulative impacts to utilities and service systems are the service areas of each utility provider as discussed in Section 5.14 – Utilities and Service Systems of this Draft EIR. Potable and non-potable water services will be provided by Riverside Public Utilities (RPU). The City's Public Works Department (PWD) provides for the collection, treatment, and disposal of all wastewater through its Riverside Regional Water Quality Control Plant (RWQCP). And the Agua Mansa Transfer Station (formerly known as the Robert A. Nelson Transfer Station), and Badlands, Lamb Canyon and El Sobrante landfills provide for the collection and disposal of solid waste.

The Project includes water conservation elements and will be required to comply with all regulations that require new construction to design, install, and maintain water efficient landscapes in order to reduce the amount of potable water used. The proposed Project, when combined with the cumulative development projects, will increase water demands from RPU. RPU's *2020 Urban Water Management Plan (UWMP)* incorporates regional projections to ensure that planning efforts for future growth are comprehensive. As determined in Section 5.14 – Utilities and Service Systems of this Draft EIR, the future estimated potable water demand from the Project combined with the current demand would still be less than the supply available. Additionally, future development facilitated within the City would be built using new building standards for water efficiency and would be designed to use less water than existing development. Future development would also occur incrementally over time, based on market conditions and other factors, such that existing water services are not overburdened by substantially increased demands at any single point in time. In addition, compliance with the existing regulatory framework would ensure adequate water supplies are available to serve future development associated with the Project under normal, dry, and multiple-dry years. Thus, because water supplies exceed

cumulative water demand, the proposed Project's contribution to water supply is not cumulatively considerable.

As discussed in Section 5.14 – Utilities and Service Systems of this Draft EIR, RPW has adequate capacity of 46 mgd to serve the Project in addition to the existing commitments. It is anticipated that RWQCP treatment facilities would be able to meet increased demand for wastewater. To serve future population growth facilitated by the Project, sewer lines would have to be expanded within the City; this could occur with other cumulative projects as well. While development other projects within the geographic context may require extension, relocation, and expansion of new sewer lines within the City, construction activities associated with future development would be subject to compliance with local, state, and federal laws, ordinances, and regulations, as well as any Project-specific mitigation measures necessary to ensure construction-related impacts are not significant. Additionally, cumulative projects would undergo separate CEQA analyses and implement mitigation measures as necessary to reduce impacts on wastewater demand and ensure consistency with applicable wastewater management plans. For these reasons, the Project's contribution, in combination with cumulative projects, to wastewater treatment is not cumulatively considerable.

The City has a comprehensive waste management program that ensures projects comply with waste-reduction ordinances and programs. While there is a shortage of landfills statewide, recycling programs and regulations continue to evolve to help ensure adequate disposal capacity. Reasonably foreseeable future development would similarly comply with waste-reduction regulations. Development of the Project in conjunction with other cumulative projects within the geographic context for cumulative impacts would generate additional demand for solid waste services, depending on net increases in population, square footage, and intensification of uses. These projects would contribute to the overall regional demand for solid waste. Concurrent with the increased demand generated by past and present development, recycling programs are being improved and developed to reduce the amount of solid waste disposed of in landfills. Such programs help offset the demand associated with waste-generating development. Additionally, cumulative projects would comply with all waste-reduction requirements and be required to conduct separate CEQA analyses and implement mitigation measures as necessary to reduce impacts on solid waste disposal capacity. Further, Project would not generate solid waste in excess of state or local standards or impair the attainment of solid waste reduction goals. As identified in Section 5.14 – Utilities and Service Systems, the three landfills that serve the site have a combined remaining capacity of approximately 172 million cubic yards and the Project's contribution to these facilities is minimal. As such, the Project's adherence with local statutes and regulations related to solid waste would not contribute to cumulatively considerable solid waste impacts.

Thus, the proposed Project's contribution to utilities and service systems is not cumulatively considerable. Therefore, cumulative impacts are **not significant**.

## 7.2 Significant Unavoidable Adverse Impacts

This topic is intended to address any significant impacts that cannot be mitigated to below a level of significance (State *CEQA Guidelines* Section 15126.2). Specific impacts which cannot be avoided or eliminated if the Project is implemented have been discussed in detail throughout Section 5.0 - Potentially Significant Environmental Effects and Section 7.1 – Cumulative Impact Analysis. A summary of the areas in which impacts could not be reduced to a level below significance are summarized below.

### **Cultural Resources**

As outlined in Section 5.3 – Cultural Resources of this Draft EIR and Section 7.1.5 – Cultural Resources above, implementation of the Project will result in significant and unavoidable impacts to a potential historic resource because it involves demolition of a potential historic resource.

#### **Greenhouse Gas Emissions**

As outlined in Section 5.5 – Greenhouse Gas Emissions of this Draft EIR and Section 7.1.7 – Greenhouse Gas Emissions above, implementation of the Project will result in significant and unavoidable impacts to greenhouse gas emissions because its emissions exceed the numeric threshold used by the City.

#### **Hazards and Hazardous Materials**

As outlined in Section 5.6 – Hazards and Hazardous Materials of this Draft EIR and Section 7.1.8 – Hazards and Hazardous Materials above, implementation of the Project will result in an inconsistency with Riverside County Airport Land Use Commission policies so will result in significant and unavoidable impacts.

#### **Land Use and Planning**

As outlined in Section 5.7 – Land Use and Planning of this Draft EIR and Section 7.1.9 – Land Use and Planning above, implementation of the Project will result in an inconsistency with the general plan policies related to airport land use due the projects inconsistency with Riverside County Airport Land Use Compatibility Plan policies so will result in significant and unavoidable impacts.

#### **Transportation**

As outlined in Section 7.1.14 – Transportation above, the Project will result in cumulative transportation impacts. The priority and timing of these road improvements cannot be determined at this time, nor are they under the sole control of the project proponent and in case of other jurisdictions, the City, to implement. Hence, it is possible that the required improvements will not be constructed in time to mitigate the Project's cumulative impacts upon off-site intersections and roads to below the level of significance. Further, an intersection will continue to operate at an unacceptable LOS in the buildout condition which is inconsistent with General Plan transportation policies. Therefore, the Project will result in significant and unavoidable impacts in the cumulative condition.

### **7.3 Growth Inducing Impacts**

According to State *CEQA Guidelines* Section 15126.2 (e), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria:

- A project would remove obstacles to population growth;
- Increases in the population may tax existing community service facilities, causing significant environmental effects; or
- A project would encourage and facilitate other activities that could significantly affect the environment.

#### **7.3.1 Removing Obstacles to Population Growth**

As discussed in Section 3.0 – Project Description of this Draft EIR, the Project will foster population growth since it will allow for higher density residential uses. The Project is in an area that is surrounded by existing and proposed development for which regional infrastructure has either already been built or

has been approved through adopted master plans. As mentioned in Section 3.0 – Project Description the Project proposes off-site improvements within the roadway right-of-way to connect to electrical facilities located approximately 1.5 miles. Nonetheless the Project would not require the expansion of infrastructure and utilities to service the Project. Because existing infrastructure is already in place and the Project does not include any construction, the Project would not remove any obstacles to population growth. Moreover, the Project does not propose construction of any new major infrastructure facilities that would remove an obstacle to growth.

### **7.3.2 Increases in Population that May Tax Existing Community Services**

As discussed in Section 5.10 - Population and Housing, the Project will provide an avenue to increase households within the City. However, as discussed in Section 5.11 – Public Services of this DEIR, while the Project will not have a significant impact upon public services such as police, fire, and schools. Police and fire services are based upon response time. The Project will be required to contribute development impact fees which will be used to support these services. Hence, while the increase in population was not identified as part of the rate of growth projected under GP buildout projections, it will not impact existing service systems.

### **7.3.3 Encourage and Facilitate Activities that Significantly Affect the Environment**

Implementation of the proposed Project will include population growth. However, given the development planned and projected under the City's GP and the general plans of the surrounding jurisdictions, it is not anticipated that the Project's potential to foster growth would lead to development not otherwise anticipated by the buildout of these general plans. The type and intensity of use proposed for the Project site will be consistent with the General Plan Amendment (GPA) and Rezone upon Project implementation.

However, as outlined in Section 5.6 – Hazards/Hazardous Materials and Section 7.1.8 above, implementation of the Project will result in an inconsistency with the RCALUP created by ALUC. The GPA and Rezone allowing for mixed uses on the Project site will increase site density and intensity which are not consistent with the Riverside County Airport Land Use policies and may contribute to safety hazards with regard to airport land use compatibility.

## **7.4 Irreversible Environmental Changes**

The intent of this section of this Draft EIR is to discuss primary and secondary impacts of the proposed Project that result in significant irreversible changes in the environment. State *CEQA Guidelines* Section 15126.2(d) identifies, as examples, such things as use of nonrenewable natural resources, irreversible changes in land use, and irreversible damage to the environment resulting from environmental accidents associated with a project.

Development of the Project will require the commitment of the approximately 17 acres site. Project-related construction activities will entail the commitment of non-renewable and/or slowly renewable energy resources, human resources, and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, and water. An increased commitment of social services and public maintenance services (e.g., police, fire, and sewer and water services) would



also be required. The energy and social service commitments would be long-term obligations. Given the financial and material investments that would be required of the Project applicant and the City, it is unlikely that the Project site would be returned to its original condition once it has been developed. See Sections 5.4 – Energy, 5.10 – Public Services, and 5.14 – Utilities and Service Systems of this Draft EIR for details.

The Project does include the development of the site which will be inconsistent with the airport land use regulations affecting Riverside Airport. Approval of the Project will result in an incompatibility that would be irreversible. Lastly, the Project includes the demolition of a structure that was found to be significant under CEQA related to historic resources. The loss of the structure would be considered irreversible.

## 7.5 Consistency with Regional Plans

Section 15125(d) of the State *CEQA Guidelines* also requires an EIR to “to discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.” The regional plans applicable to the proposed Project are: the City’s GP, the MSHCP, the SCAG RTP/SCS, Regional Water Quality Control Board (RWQCB), and the Air Quality Management Plan (AQMP). **Table 7.0-B, Location in which DEIR Consistency with Regional Plans is Discussed**, identifies the location in which each of these plans is discussed in this Draft EIR.

**Table 7.0-B, Location in which DEIR Consistency with Regional Plans is Discussed**

<b>Plan</b>	<b>Discussion Location</b>	<b>Consistency (Project / Cumulative)</b>
AQMP	Section 5.2 – Air Quality (Related Regulations and Criteria Air Pollutants)	Yes / Yes
GP and GPU I	Sections 5.0 through 5.14 (Environmental impact analysis section for each environmental issue under the heading “Related Regulations”)	
	▪ 5.1 – Aesthetics	Yes / Yes
	▪ 5.2 – Air Quality	Yes / Yes
	▪ 5.3 – Cultural Resources	No / No
	▪ 5.4 – Energy	Yes / Yes
	▪ 5.5 – Greenhouse Gas Emissions	No / No
	▪ 5.6 – Hazards/Hazardous Materials	No / No
	▪ 5.7 – Land Use and Planning	No / No
	▪ 5.8 – Noise	Yes / Yes
	▪ 5.9 - Population/Housing	Yes / Yes
	▪ 5.10 – Public Services	Yes / Yes
	▪ 5.11 – Recreation	Yes / Yes
	▪ 5.12 – Transportation	Yes / No
	▪ 5.13 – Tribal Cultural Resources	Yes / Yes
▪ 5.14 – Utility/Service Systems	Yes / Yes	
RWQCB	Section 5.14 – Utility and Service Systems (National Pollutant Discharge Elimination System Construction Permit)	Yes / Yes
SCAG RTP/SCS	Section 6.0 – Regional Consistency	Yes

## 8.0 Alternatives to the Proposed Project

An EIR must identify ways to mitigate or avoid the significant effects that a proposed project may have on the environment. The City, acting as the CEQA Lead Agency, is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives addressed in an EIR is governed by a “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.

Of the alternatives considered, the EIR needs to examine in detail only those that the Lead Agency determines could feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen any of the significant effects of the proposed project. Per State *CEQA Guidelines* Section 15364, “feasible” has been defined as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”

The following discussion considers alternatives to implementation of the Project. The discussion examines the potential environmental impacts resulting from each alternative. Through comparisons of these alternatives to the Project, the relative advantage(s) of each can be weighed and analyzed. State *CEQA Guidelines* Section 15126.6 identifies the parameters within which consideration and discussion of alternatives to the proposed Project should occur. As stated in this section of the *Guidelines*, alternatives must focus on those that are potentially feasible and which attain most of the basic objectives of the Project.

The Initial Study prepared for this project determined the following topics to be less than significant and were therefore, not addressed in this Draft EIR: Agriculture and Forestry Resources, Biological Resources, Geology and Soils, Hydrology and Water Quality, Mineral Resources, and Wildfire Hazards. Of the topics that were addressed in this Draft EIR, Section 5.0 of this Draft EIR determined the following environmental topics to be less than significant:

- Aesthetic Resources
- Air Quality
- Energy
- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems

For the purposes of the alternative analysis, since none of these topics were determined to be significant, they are not included in the detailed analysis of the alternatives below to compare to the proposed Project.

### 8.1. Project Objectives

Per State CEQA Guidelines Section 15124 (b), an EIR needs to include a statement of the objectives of a project which helps the City develop a reasonable range of alternatives. The Objectives need to outline

the general purpose of the Project. The Project Objectives are identified by the Project applicant as follows:

1. Primarily, provide quality, multi-family housing on an existing underutilized site, to help the City meet the State's allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers, as well as the City's overarching self-prescribed housing unit numbers.
2. Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.
3. Place housing near existing commercial uses to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.
4. Provide compatible mixed-use development contributing to the character of the surrounding neighborhood.
5. Establish a mixed-use development that will provide a land use transition between the existing commercial Hardman Center and the residential developments surrounding the project site.

## 8.2. Summary of the Project's Significant Unavoidable Impacts

The analysis in Section 5.0 of this DEIR determined that even with implementation of mitigation measures, significant environmental impacts will result from the operation of the proposed Project. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce any of the following Project-related significant unavoidable impacts:

- Cultural Resources: Project and Cumulative Impacts
- Greenhouse Gas Emissions: Cumulative Impacts
- Hazards and Hazardous Materials: Project and Cumulative Impacts
- Land Use: Project and Cumulative Impacts
- Traffic/Transportation: Cumulative Impacts

## 8.3. Rationale for Alternative Selection

State *CEQA Guidelines* Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." According to this section of the State *CEQA Guidelines*, "...an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation." An EIR is not required to consider alternatives which are infeasible. The City, as lead agency, is responsible for selecting a range of Project alternatives for examination, and there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the "rule of reason" (*CEQA Guidelines* Section 15126.6 (a)). Among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site. (*CEQA Guidelines* Section 15126.6 (f)(1)).



With respect to the selection of alternatives to be considered in an EIR, State *CEQA Guidelines* Section 15126.6(b) states "...the discussion of alternatives shall focus on alternatives to the project or its location which 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." That is, each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed Project. For this Project, those significant effects are related to Cultural Resources (historical resources), Hazards and Hazardous Materials (airport land use compatibility), Land Use and Planning (inconsistency with airport land use compatibility), and Traffic/Transportation (cumulative).

The rationale for selecting the alternatives to be evaluated, and a discussion of the "no project" alternative are also required (State *CEQA Guidelines* § 15126.6(e)). The "no project" alternative in this case, means no development would take place within the site limits and the existing building would remain with current zoning of General Commercial. The other alternatives evaluated in this DEIR were selected based on their ability to reduce or avoid impacts to Cultural Resources, Hazards and Hazardous Materials, Land Use and Planning, and Traffic/Transportation (Cumulative).

## **8.4. Alternatives Rejected From Further Consideration**

Section 15126.6(c) of the *CEQA Guidelines* specifies that an EIR should identify alternatives that were considered by the lead agency but were rejected during the scoping process and identify the reasons for eliminating the alternatives from further consideration. Section 15126.6(c) further indicates that a lead agency may eliminate an alternative from detailed consideration in an EIR if it fails to meet the basic Project Objectives, is infeasible, or does not avoid significant environmental impacts.

1. No Change/Status Quo Scenario
2. Alternative Location
3. Other Uses Considered for Site – Storage Facility

### **8.4.1. No Change/Status Quo Scenario**

Under the No Change/Status Quo Scenario, no development (including demolition) would take place within the Project site limits. No ground-disturbing activities would take place, nor would any form of structure be erected. Under this scenario, which was rejected as an Alternative, the site would remain in existing conditions and the site would not be developed as proposed or for any other use. The current site is the abandoned Sears building which is a source of nuisance to the neighborhood and is subject to transient attention which has resulted in on-going security issues. This No Change/Status Quo scenario would greatly underutilize the Project site and would not meet any of the Project Objectives. Section 15126.6(f)(1) of the *State CEQA Guidelines* states that among the factors that may be considered when addressing the feasibility of alternatives, are site suitability and economic viability. Although in the short-term this scenario may be feasible to allow the site to remain unutilized and for the historic structure to remain on site, over the long-term, it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form. Additionally, the vacant aspect of the site will continue to represent a place where homeless individuals and other transient individuals trespass illegally and create issues with law enforcement and potential safety issues with the existing surrounding uses. Thus, since it can be reasonably anticipated that the site would develop in some form given its already entitled condition, this No Change/Status Quo scenario was rejected as an Alternative. Therefore, this scenario was not further considered.

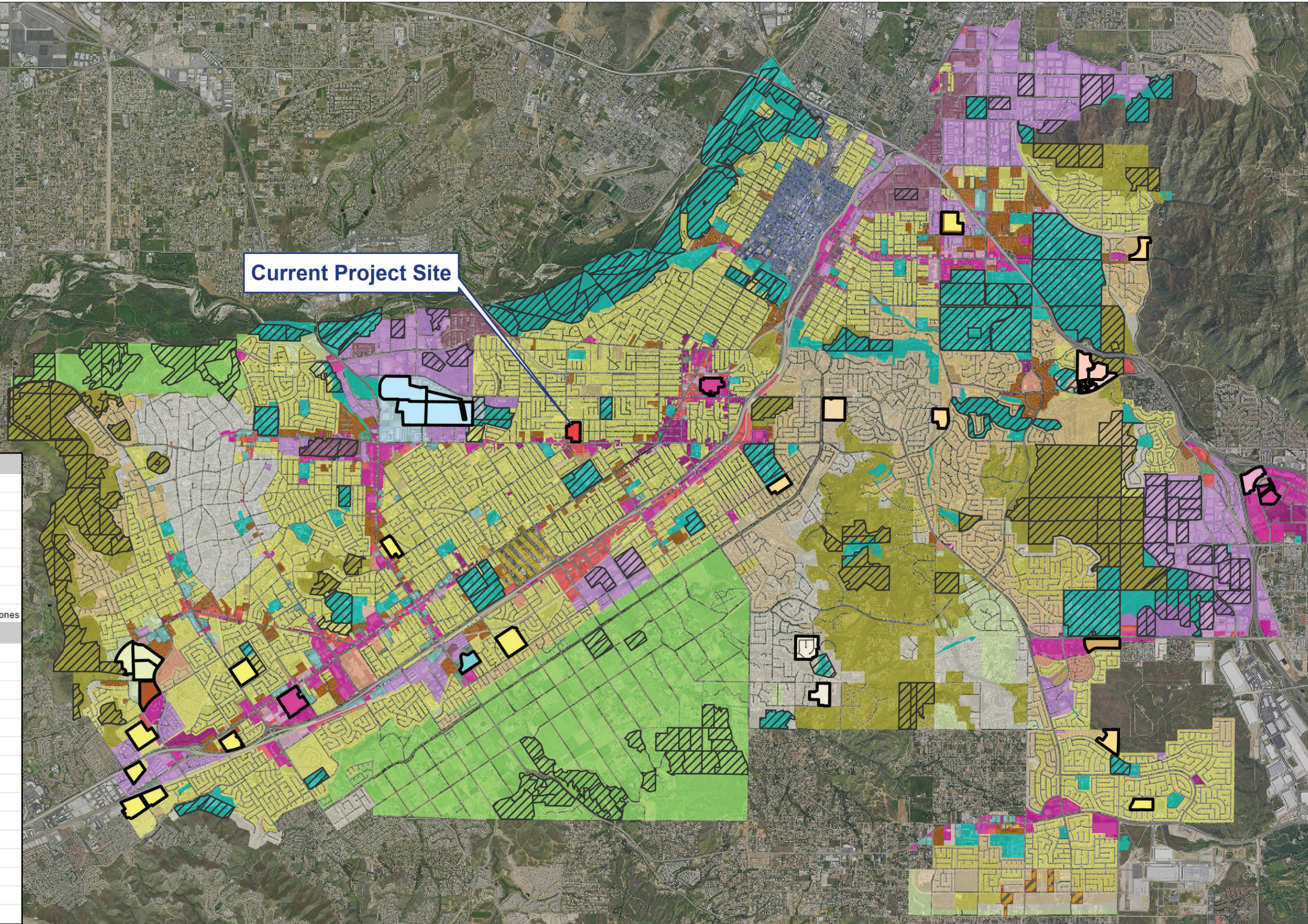
### 8.4.2. Alternative Location

Moving the Project to another site may potentially avoid significant impacts identified with the demolition of the existing Sears structures, which are considered historic and significant. It is required under CEQA that alternative site(s) be evaluated if any feasible sites exist where significant impacts can be lessened. The environmental impacts of development on any other site in the City are expected to be similar to those of the proposed Project related to the proposed use. However, the demolition of a historic resource, as well as the airport land use incompatibility could be avoided by another site. An alternative site of similar size (approximately 17 acres), surrounded by existing utilities and access, was researched. Although there are other 17-acre sites in the City, the other sites of this size are either not of the current zoning or General Plan designation to support the Project, and so would result in the same need to change the zone and general Plan designation as the Project does, or the other sites are located in incompatible areas such as surrounding by Industrial, rural residential, agricultural, or public facility sites. The other site locations also offer incompatibility issues, as does the Project with the incompatible airport zones. **Figure 8.0-1, Viable 17+Acre Parcels Zoning Map** depicts the areas where similar locations with the corresponding zoning and general plan designations. Given that the Project proposes a General Plan Amendment and Rezone to allow for commercial-retail and high-density residential uses, there appear to be no compatible sites available. Therefore, this alternative was not further considered.



**LEGEND**

- Viable 17+ Acre Parcels
- Viable Parcels Zoning**
- AIR (Airport)
- CG (Commercial General)
- CR (Commercial Retail)
- MU - U (Mixed Use - Urban)
- MU - V (Mixed Use - Village)
- R-1-1/2 acre (Single Family Residential)
- R-1-13000 (Single Family Residential)
- R-1-7000 (Single Family Residential)
- R-1-8500 (Single Family Residential)
- R-3-1500 (Multi-Family Residential)
- R-3-2000 (Multi-Family Residential)
- R-3-3000 (Multi-Family Residential)
- RE (Residential Estate)
- Non-Viable 17+ Acre Parcels (PF, I, BMP, RR, RA-5, RC)



Non-Viable 17+ Acre Parcels	
Zone	Number of Parcels Intersecting the Zone
Public Facilities	82
Industrial	3
Business Park	36
Rural Residential	0
Residential Agricultural	34
Residential Conservation	58

\*Total of 208 Non-Viable 17+ Acre Parcels, some of which fall in multiple non-viable zones

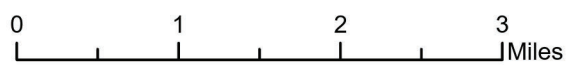
Viable 17+ Acre Parcels	
Zone	Number of Parcels Intersecting Zone
AIR	4
CG	1
CR	3
MU-U	1
MU-V	1
R-1-1/2 acre	2
R-1-13000	2
R-1-7000	10
R-1-8500	4
R-3-1500	2
R-3-2000	1
R-3-3000	3
RE	3

\*Total of 35 Viable 17+ Acre Parcels, some of which fall in multiple viable zones

H:\2022\22-0172\GIS\PRO\Aerial\_site\_and\_offsites.aprx Map created 01 Aug 2023

Source: Riverside County Zoning, 2022.

**Figure 8.0-1 Viable 17+ Acre Parcels Zoning Map**  
Arlington Mixed Use





### 8.4.3. Other Uses Considered for the Site

Other uses considered but rejected for consideration included a Self-Storage Facility. The existing Sears Department Store building is approximately 178,426 square feet in size which is significantly larger than typical self-storage facilities which are approximately 50,000 sf in size. A viable self-storage tenant would require multiple units that have access to the exterior of the building. This would require the addition of numerous exterior doors and cutting openings in the building. However, in doing so, the existing exterior walls of the building would not be of much use for seismic loads imposed on the structure by current code requirements, especially due to removal of the wall for creation of additional openings for storage access. For seismic requirements, the existing exterior walls would need to be reinforced with new walls inside of existing exterior walls and associated vertical elements from these walls would need to be transferred down to the lowest foundation level with new foundations.

To utilize the existing building, it would need to be modified to reinforce and significantly upgrade the ground level building slab in order to accommodate loading parameters required for this type of use which are 2.5 times higher than the currently allowable loading for the existing structure for a one-story storage structure. Upgrades would likely require the addition of an entirely new slab. Given that the exterior walls are supported by basement foundations and new supports would be supported on grade, this introduces potential differential settlement issues between the new building supports and existing building wall supports which would not be structurally acceptable. Support in the basement would be needed, foundations would need to be added, and existing foundations would need to be upgraded. If multiple levels of are desired for a storage facility, utilization of the existing structure would be impossible. (INNOVA, pp. 2-3).

In addition to the structural infeasibility, use of the existing Sears Department Store building as a Self-Storage Facility would not be a viable option due to the likely failure to attract a self-storage tenant. There is already a sufficient number of Self-Storage Facilities in the market. The area around the Project site also has very little population growth or decline and the large majority (63.7 percent) of nearby housing units are owner-occupied as opposed to renters. Little fluctuation in population coupled with a low percentage of renters which tend to have a higher need for storage units decreases the viability of a Self-Storage Facility at this location. Finally, existing Self-Storage facilities in the City are “horizontal”, allowing users to drive to their garages and unload directly from a truck. “Vertical” or stacked storage facilities, as would be implemented in the existing Sears Department Store building, require users to unload, utilize a freight elevator, and wheel items down a corridor to their lockers, adding time and labor, and further decreasing viability. (AxIOM, p. 5).

Hence, utilizing the existing building as a self-storage facility was considered, but ultimately rejected by the Project proponent because of the structural issues required for this adaptive reuse, as well as the low viability of the use. Further, this other use would not meet the key Project Objective of meeting the City’s RHNA allocations. Therefore, this alternative was not further considered.

## 8.5. Alternatives under Consideration

This section of the Draft EIR presents the analysis of four alternatives in comparison to the potential environmental effects associated with the proposed Project. In accordance with State *CEQA Guidelines* Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the impacts of the proposed Project.



This section of the Draft EIR presents the analysis of four alternatives in comparison to the potential environmental effects associated with the proposed Project. In accordance with State *CEQA Guidelines* Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the impacts of the proposed Project. The following Project Alternatives have been identified for their potential to reduce impacts related to the proposed Project:

- Alternative 1: No Project/No Demolition/Keep Existing Commercial Designation
- Alternative 2: Adaptive Reuse to Residential
- Alternative 3: ALUC Consistent
- Alternative 4: Reduced Density

Each Alternative is described below and followed by:

- Alternative's Impact Analysis: a discussion of environmental topics evaluated in this Draft EIR that were found to be potentially significant as a result of the proposed Project and the Alternative's ability to reduce impacts over the proposed Project;
- Relationship of Alternative to Project Objectives: the Alternative's ability to achieve the proposed Project's objectives; and
- Alternative Conclusion: the Alternative's feasibility.

A comparison of Alternatives is presented in a matrix in Section 8.6, below.

### **8.5.1. Alternative 1: No Demolition/Keep Existing Commercial Designation**

Alternative 1 involves keeping the existing 178,426 sf Sears building in its current condition with basement and ground level, along with maintaining the existing zoning designation of General Commercial. Under this Alternative the existing building will remain as is, and no demolition would occur. The use of the site under this Alternative assumes that another large commercial retailer could move into the building as is. However, under this Alternative, the current vacant status of the site would not occur, as it is expected that another company would want to use the whole retail building without having to demolish the main Sears Department Store building. This Alternative could instead, entail the demolition of the non-historic automotive service ancillary building.

## Alternative's Impact Analysis

### *Cultural Resources*

This Alternative would not require demolition of the existing structures. However, the existing structures do not meet current building codes. A large new retail use would still trigger the need for significant building upgrades and reconstruction in order to meet current building codes, which would result in significant changes to the existing structure. Even if the site were to be occupied by another retail use, because of the need to meet current building and seismic codes, the remodeling would be significant and would most likely result in structure changes that would detract from the historical significance of the existing structure. Like the proposed Project, this Alternative would result in impacts related to historical resources. Therefore, impacts related to cultural resources would be similar to that of the proposed Project.

### *Greenhouse Gas Emissions*

This Alternative would not result in demolition of the existing building; however, it would include future commercial uses. It is expected this Alternative would result in greater GHG impacts than the Project since commercial uses typically generate more vehicle trips than residential uses on a per unit basis. As shown in Table 4-3 of the Project's TIA (Appendix F), the existing commercial use could generate 1,326 more daily vehicle trips compared to the proposed Project. Therefore, Alternative 1 would result in greater impacts than the Project.

### *Hazards and Hazardous Materials*

The existing structures are located entirely within Riverside County Airport Land Use Compatibility Plan (RCALUCP) Zone B1. As discussed in Section 8.5.4 below, B1 is the most restrictive land use compatibility zone allowing an average acre intensity of 25 people per acre and a single acre intensity of 50 people per acre. Utilizing RCALUCP's *Appendix C – Determining Concentrations of People*; specifically *Table C1: Occupancy Levels – California Building Code*, this Alternative would result in 189 people per average acre<sup>1</sup> which is not consistent with RCALUCP policy.

Issues related to hazardous materials, such as the presence of asbestos and potentially lead-based paint present in building materials of the existing Sears building would remain present under this Alternative. And any future removal of these materials would require legal removal and disposals.

Impacts related to Hazards and Hazardous Materials would be similar to that of the proposed Project.

### *Land Use and Planning*

Because this Alternative would be inconsistent with RCALUCP policy, it would also result in an inconsistency with the City's GP 2025 land use policies related to airports. Therefore, impacts related to Land Use and Planning would be like that of the proposed Project.

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1. Based on use 27. Stores — Retail Sales Rooms Basements and Ground Floors, requires 30 square feet per occupant resulting in a potential of 2,974 people in the structure. To determine number of people per average acre, acreage of site located in Zone B1 as identified in ALUC-C, of 15.76 was utilized. (2,974 people / 15.76 acres = 189 people per average acre).

*Transportation*

Under Alternative 1, the existing structures would simply be leased for commercial uses as they had been in the past. Under this Alternative, no demolition or new development would occur. As shown in Table 4-3 of the Project’s TIA (Appendix F), the existing commercial use would generate 1,326 more daily vehicle trips compared to the proposed Project. Therefore, Alternative 1 would result in greater impacts than the Project.

**Relationship of Alternative 1 to Project Objectives**

Alternative 1 assumes that the site would remain in its existing condition and redevelopment into a large retail commercial use which is consistent with the existing Commercial designation. An analysis of whether Alternative 1 meets each Project Objectives is provided in **Table 8.0-A, Alternative 1: No Project/Development of Existing Land Use and Zoning Project Objectives Comparison** below.

**Table 8.0-A, Alternative 1: No Demolition/Keep Existing Commercial Designation**

Project Objective	Alternative Meets Objective?
Primarily, provide quality, multi-family housing on an existing underutilized site, to help the City’s meet the State’s allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers, as well as the City’s overarching self-prescribed housing unit numbers.	<b>No.</b> Alternative 1 will leave the existing structures in place. Under this Alternative 1, the land use would remain commercial-retail and the site would not provide quality multi-family housing nor would it meet the City’s goal to reach RHNA allocations.
Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.	<b>No.</b> Alternative 1 would allow for retail use and would not place housing near a transit corridor.
Place housing near existing commercial uses to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.	<b>No.</b> Alternative 1 will not demolish the existing buildings and would not propose housing.
Provide compatible mixed-use development contributing to the character of the surrounding neighborhood.	<b>No.</b> Alternative 1 would keep the existing structures commercial-retail designation and continue to use the site as a large box retailer. This Alternative would not meet this Objective because it would provide only commercial uses and not provide any residential component or amenities that would help contribute to the transitional character that a mixed-use development would provide.

**Table 8.0-A, Alternative 1: No Demolition/Keep Existing Commercial Designation**

<b>Project Objective</b>	<b>Alternative Meets Objective?</b>
<p>Establish a mixed-use development that will provide a land use transition between the existing commercial Hardman Center and the residential developments surrounding the project site.</p>	<p><b>No.</b> While Alternative 1 would keep the existing structures and commercial-retail designation for the continued use of the site as a large box retailer, it would not establish a mixed-use development because no other land uses would be provided. The site under existing conditions does transition from the Hardman Center to the surrounding residential projects. However, maintaining the existing designation and structures, does not offer the residential component or amenities as a mixed-use development, that would provide better transitional characteristics, that would be provided by the proposed Project.</p>



## Alternative 1 Conclusion

Alternative 1 has the potential to reduce cultural resource impacts as it relates to the Project. Nonetheless, implementation of Alternative 1 would require a level of reconstruction to the existing building structure and thus would still reach the same conclusion. The site would reach the same conclusions for hazards/hazardous materials and land use planning as the proposed Project because the existing commercial designation is not consistent with RCALUCP policy, nor was the former big box retail use. Moreover, Alternative 1 would result in greater impacts as it relates to transportation and GHG as full commercial use of the site would result in a higher trip generation rate than that of the Project. Additionally, while air quality and noise impacts were found to be less than significant for the proposed Project, because Alternative 1 results in greater traffic trips, it is anticipated that these topics would be greater than that of the Project due to increased emissions and roadway noise.

State *CEQA Guidelines* Section 15126.6(f)(1) states that among the factors that may be considered when addressing the feasibility of alternatives are site suitability and economic viability. Alternative 1 would satisfy none Project Objectives and would not meet the key Objective of providing additional housing to meet the City's RHNA allocations. Additionally, the existing abandoned Sears building has been subject to extreme dismantlement and vagrancy.

Alternative 1 is not economically viable. The Sears building was designed for a single user. Large scale retailers requiring buildings the size of the abandoned Sears building are not choosing to locate near the Project site, instead opting for regional locations and developed shopping centers which attract larger volumes of customers. Demising the building into multiple smaller rental suites is also not possible as it would be difficult to create basic shells and floorplates for modern, creditworthy tenants. The building also has nearly 50% of its total floor area in the form of a subterranean basement which is not desirable space for the vast majority of retailers to whom this property would be marketed. (AXIOM, p. 4).

Further, according to Innova, many of the building's systems have been removed/stolen and there are significant gaps between the structural integrity of the existing building and the current building codes thereby requiring significant modifications that in and of themselves could result in partial or full demolition of the building. Even if a new large retail use would still trigger the need for significant building upgrades and reconstruction, meeting today's current building codes, which would result in significant changes to the existing structure. Even if the site were to be occupied by another retail use, because of the need to meet current building and seismic codes, the remodeling would be significant and would most likely result in structure changes that would detract from the historical significance of the existing structure. Additionally, a new retail user would also be subject to new approvals by the City for building permits and occupancy, both of which would trigger the need for compatibility study with the existing airport land use plan. A new retail use would also not meet the density requirements of the airport land use plan, and therefore Alternative 1 would still be considered incompatible with the airport. Therefore, Alternative 1 is rejected and considered infeasible.

Thus, since Alternative 1 would most likely result in the same or similar impacts to the existing structure, its historical context and significance would also be impacted. Therefore, Alternative 1 is considered not feasible, and does not meet most of the Project Objectives.

### 8.5.2. Alternative 2: Adaptive Reuse to Residential

Since the Proposed Project includes the full demolition of the Sears Building, which would result in a significant and unavoidable impact to a historical resource (See Cultural Resources Section), Alternative

2 proposes keeping the existing Sears building and adaptively reusing it for residential uses only. This Alternative would provide a range of 44 to 140 residential housing units. Under this Alternative, the demolition of the whole building would not occur, and some, but not all of the existing building could still be retained. Under this Alternative, the resulting land uses would need to fit into the existing building footprint primarily and any historically significant attributes of the building would need to be retained which involve the Mid-Century Modern style of architectural.

Characteristics of this type of architecture include: Simple geometric forms, post-and-beam construction, flat or low-pitched gabled roofs, flush mounted steel framed windows or large single-paned wood-framed windows, exterior staircases, decks, patios, and balconies, and brick or stone often used as primary or accent material. Characteristics of the department store typology include: large surface parking lots surrounding the building, being disconnected from the street, windowless design, free-standing building, one to two stories in height, boxlike massing, and located outside of urban centers. The existing structures include all of the characteristics of department store typology and include such attributes as solid wall surfaces; rectangular shape with flat roof, clad in concrete, brick, tile, and stone; rectangular roof overhangs that wrap around the building; textured tile above the old signage; rock wall entrances; and trees integrated into the corners.

Rehabilitation and adaptive reuse of the building under this Alternative would follow the Secretary of the Interior's Standards for Rehabilitation (Standards). If properly executed in conformance with the Standards, rehabilitation and adaptive reuse of the Sears department store and auto center building as part of a new development plan for the site would reduce project-related impacts to historical resources to a less-than-significant level and meet the preservation objectives of the City of Riverside to protect its important historic resources and encourage public accessibility of resources.

For Alternative 2, several residential densities and configurations were studied by Architects Orange and Innova for viability and historic and structural integrity as found in Appendix C of this Draft EIR. Four options with various numbers of residential units ranging from approximately 44 to 140 units were studied. All four options would require structural improvements to bring the building into compliance with current building codes and make it seismically safe.

Additionally, since the existing building currently consists of mostly solid walls, with little to no windows or openings besides the doors, transforming the existing building into residential units would require a certain amount of fresh air ventilation and windows/daylight. Creating ventilation, incorporating private open space through balconies/patios and installing windows would likely result in structural issues. Transforming the existing building would require removing not only the roof, but the walls of the existing building. The analysis in Appendix C included considering removing the roof and leaving two walls intact however by doing so, this would then result in significant changes to the building that would not provide preservation of the historical aspect of the existing building (i.e. example of early-era big box retail).

## Alternative's Impact Analysis

### *Cultural Resources*

This Alternative would not require demolition of the existing structures. However, the existing structures do not meet current building codes and would need modification to transform the structure into residential units. To meet current building and seismic codes, remodeling of the structures would be significant and result in structural changes that would detract from the historical significance of the existing structures and would not be consistent with the Standards as there would be impacts to features and spaces that characterize a property. Efforts to preserve the existing structures the structures would be significantly altered to affect the historical context of the resources. Therefore, impacts related to cultural resources would be reduced from that of the proposed Project but will still be categorized as significant and unavoidable as was concluded by the proposed Project.

### *Greenhouse Gas Emissions*

This Alternative would result in residential development and buildings which would still generate GHG emissions, like the Project. However, given that less than 40 percent of the dwelling units would be proposed under this Alternative, and that no commercial uses are proposed, impacts related to GHG will be substantially reduced and likely fall below the significance threshold. Therefore, this impact would be less than the proposed Project.

### *Hazards and Hazardous Materials*

This Alternative would be inconsistent with RCALUCP policy, as the existing structures are currently inconsistent with building height requirements outlined in the RCALUP policy. Adaptation of the existing structure into residential units would result in an inconsistency with RCALUCP policy since most of the site is located within RCALUCP Zone B1 which has density standards making residential development prohibitive.

Additionally, the asbestos and potential lead-based paint in the existing building materials would still be present and have to be legally disposed of in order to reuse the site and make it residential. Therefore, impacts related to Hazards and Hazardous Materials would be similar to that of the proposed Project.

### *Land Use and Planning*

This Alternative would be inconsistent with RCALUCP policy. As such, this Alternative would conflict with the City's GP 2025 policies related to airports. Therefore, impacts related to Land Use and Planning would be similar to that of the proposed Project.

### *Transportation*

Under this Alternative, the site would still develop with residential uses. Development of the site with these uses would result in passenger vehicles trips to and from the site and the City would require applicable roadway improvements for any project. Even if this Alternative was not built as contemplated, another project would still be conditioned to build any necessary roadway improvements and contribute fair share fees. As such, cumulative impacts to transportation/traffic would remain significant since the priority and timing of road improvements are not under the sole control of a project proponent. Thus, this Alternative would result in similar cumulative traffic impacts. Therefore, Project impacts to cumulative transportation/traffic would be similar to that of the proposed Project.

### Relationship of Alternative 2 to Project Objectives

The Adaptive Reuse Alternative envisions using the existing building for future residential uses, instead of demolishing the existing building. An analysis of whether Alternative 2 meets each Project objective is provided in **Table 8.0-B, Alternative 2: Adaptive Reuse Project Objectives Comparison**.

**Table 8.0-B, Alternative 2: Adaptive Reuse to Residential Project Objectives Comparison**

Project Objective	Alternative Meets Objective?
Primarily, provide quality, multi-family housing on an existing underutilized site, to help the City’s meet the State’s allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers, as well as the City’s overarching self-prescribed housing unit numbers.	<b>Yes but to a lesser degree.</b> Alternative 2 would allow for multifamily housing, however but only provide a range of units from 44 to 140 units given the constrains the existing structure would place on the ability to reuse the existing structure.
Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.	<b>Yes.</b> Alternative 2 would place housing near a transit corridor and could allow for less congestion and greenhouse gas emissions.
Place housing near existing commercial uses to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.	<b>Yes.</b> Alternative 2 would place housing near existing commercial uses and still provide pedestrian connectivity.
Provide compatible mixed-use development contributing to the character of the surrounding neighborhood.	<b>No.</b> Alternative 2 not provide mixed use development. Under this Alternative there would not be a commercial component to which there could be mixed use contributions to the surrounding neighborhood.
Establish a mixed-use development that will provide a land use transition between the existing commercial Hardman Center and the residential developments surrounding the project site.	<b>No.</b> Alternative 2 does not include mixed use development. Under this Alternative there would not be a land use transition of mixed use between the Hardman Center and the surrounding residential areas.

### Alternative 2 Conclusion

Alternative 2 Adaptive Reuse was studied and considered. However, as identified in Appendix C, adaptive reuse and the need to meet the current building code, presents issues that would compromise the integrity of the building or the safety of the occupants. Alternative 2 meets three out of the five Project Objectives. However, this Alternative does not provide any mixed uses so it only partially meets the Objectives related to bringing mixed uses to the City, and only partially meets the key Objective of helping the City meet its RHNA obligations. As outlined above in Section 8.4.3, the marketability of the site being adaptively reused is very difficult related to the existing building codes and the type of structure remaining. Additionally, this use would also still not be compatible with the airport land use plans, which would still require a statement of overriding considerations overrides as does the proposed Project.



Given the significant reconstruction and reconfiguration of the existing building that would need to take place to accomplish adaptive reuse, and that any adaptive reuse would still be considered incompatible with the airport land use plan, Alternative 2 is rejected as infeasible.

### 8.5.3. Alternative 3: ALUC Consistent

Since the proposed Project is within a mile of the Riverside Municipal Airport and will include inconsistencies with the Riverside County Airport Land Use Comparability Plan (RCALUCP), unavoidable and significant impacts will occur. Alternative 3 proposes an Alternative that utilizes the densities or intensities allowable per the current RCALUCP. As outlined in both Section 3.0 – Project Description and Section 5.6 – Hazards and Hazardous Materials of this Draft EIR, this Alternative is in Zones B1, C and D of the RCALUCP. As shown in **Table 5.6-B** of this Draft EIR, the RCALUCP has classified Zone B1 with a high noise impact and a high-risk level, Zone C has both a moderate noise impact and risk level, and Zone D has a moderate noise impact and a low risk level. **Figure 3.0-7** of this Draft EIR shows the relationship of these zones to the Project site. The RCALUCP provides standards and criteria for both residential density and non-residential intensity. These standards and criteria are defined and discussed below.

#### Residential Density Standards

Density standards are used for residential uses. Density is determined by calculating the number of dwelling units per acre (du/ac). Zone B1 allows for a residential density standard of 0.05 du/ac on parcels greater than 20 acres in size and Zone C allows for a residential density standard of 0.2 du/ac on parcels greater than 5 acres in size. Zone D allows two options for residential density. Option – 1 allows for a residential density standard of 0.02 du/ac or less on parcels at least 5 acres in size while Option – 2 allows for a residential density standard above 5.0 du/ac on parcels that smaller than 0.2 acres (or 8,712 square feet). **Table 8.0-C, Alternative 3: Allowable Residential Dwelling Units** below, identifies the number of units that could be developed on the Project site within the respective Land Use Compatibility Zone to be consistent with the RCALUCP.

<b>Table 8.0-C, Alternative 3: Allowable Residential Dwelling Units</b>		
<b>Land Use Compatibility Zone</b>	<b>Available Acres for Development<sup>1</sup></b>	<b>Number of Dwelling Units Permitted by Alternative 3</b>
B1	15.76	0 <sup>2</sup>
C	1.07	0 <sup>3</sup>
D – Option 1 <sup>4</sup>	0.48	0 <sup>5</sup>
D – Option 2 <sup>4</sup>	0.48	0 <sup>6</sup>

Source: ALUC-C

**Notes:**

1. Acreages in each zone are based on those presented in ALUC Staff Report (ALUC-C).
2. Parcels are under 20 acres in size so no dwelling units may be developed.
3. Parcels are under 5 acres in size so no dwelling units may be developed.
4. Must choose one Option only.
5. Site parcels are under 5 acres in size so do not meet minimum acreage requirement. Therefore, no dwelling units may be developed.

Table 8.0-C, Alternative 3: Allowable Residential Dwelling Units		
Land Use Compatibility Zone	Available Acres for Development <sup>1</sup>	Number of Dwelling Units Permitted by Alternative 3
6. RCALUCP policy requires that parcels be less than 0.2 acres or 8,712 square feet in size and density must exceed 5 du/ac. This requirement precludes any City of Riverside multi-family residential zones with respect to meeting minimum lot size. The City's R-1-8500 and R-1-7000 zones require a minimum lot size for 8500 and 7000, respectively. However, density in these zones would not meet RCALUCP requirement of at least 5 du/ac. (MC 19.100).		

During the General Plan Housing Element update conducted in 2022 and 2023, the City created an opportunity sites inventory which considered placing residential development on suitable vacant and/or non-vacant sites throughout the City. The opportunity site inventory identified how zoning and development standards on each of these opportunity sites could facilitate housing for the City to meet its RHNA obligation. (GPUI, p. HE105.) The City considered various sites throughout the City and evaluated them against various suitability criteria and developmental constraints. One of the constraints used to eliminate a site from the opportunity site inventory was airport land use compatibility. Existence of Airport Compatibility Zones removed properties from consideration if the properties were in the most restrictive airport land use areas: A, B1, B2, C, C1, and C2 as set forth in the RCALUCP. Since the site is located in Zone B1 and C, the proposed Project, which otherwise would have been an ideal opportunity site for residential development, was removed from consideration due to its proximity to the Riverside Municipal Airport. As identified in **Table 8.0-C** above, there are no RCALUCP compatibility zones and City land use designations/zoning designations that align that would allow for development of residential units on this site. Thus, Alternative 3 would not have the ability to provide any residential dwelling units which would be consistent with these RCALUCP residential densities for Zones B1, C and D.

Non-Residential Intensity Standards

Intensity standards are used for non-residential uses. Intensity is determined by calculating the number of people generated by type of non-residential use per acre. Two measurements are required by ALUC to determine site intensity: Average Acre and Single Acre. Average acre intensity is the total number of people on a site divided by the total numbers of site acreage. (Total People / Total Project Site Acreage = Average people per acre). Single Acre intensity is the total number of people within a given one acre area based on type of non-residential use.

Based on the acreages provided in **Table 8.0-C** above, average acre intensity would be restricted to 25 people per acre in Compatibility Zone B1, 75 people per acre in Zone C, and 100 people per acre in Zone D. Single acre intensity would be restricted to 50 people per acre in Compatibility Zone B1, 150 people per acre in Zone C, and 300 people per acre in Zone D.

RCALUCP's *Table C1 – Occupancy Levels/California Building Code* found within *Appendix C - Determining Concentrations of People* identifies the number of people generated based on use per square feet. A majority of the site is located within Zone B1 so non-residential uses would be restricted to uses and square footages that do not generate people beyond those numbers identified in **Table 8.0-C** above. An example of consistent non-residential structures that may be compatible with this site's location would be warehouse or airport hangers (with no repair), similar in square footage to the existing Sears Department Store building. These uses require 500 square feet per occupant so are likely to generate intensity that is consistent with RCALUCP policy.

Alternative 3 would include non-residential uses meeting the above requirements for consistency with RCALUCP Compatibility Zone B1.

#### *Alternative's Density/Intensity*

As shown on Table 8.0-C above, Alternative 3 would allow no residential dwelling units and develop non-residential uses such as a warehouse or airport hangers no larger than the current building square footage of approximately 178,000 sf. This Alternative would also include demolition of the existing Sears Buildings.

### **Alternative's Impact Analysis**

#### *Cultural Resources*

This Alternative would still involve demolition of the existing structures. Like the proposed Project, this Alternative would result impacts related to historical resources. Therefore, impacts related to cultural resources would be similar to that of the proposed Project.

#### *Greenhouse Gas Emissions*

This Alternative would not allow for the development of residential or commercial uses, as those would not be consistent with the RCALUCP. Therefore, the limited warehouse or airport hangers that could be developed on the site after demolition of the existing structure, would still generate some GHG emissions; however, it's expected that the uses on Alternative 3 would generate far less GHG emissions due to a reduction in vehicle trips and Alternative 3 will likely fall below the significance threshold. It's expected that impacts to GHG would be less than the Project.

#### *Hazards and Hazardous Materials*

This Alternative would develop the site consist with RCALUCP policy. As such, this Alternative may not result in a conflict with RCALUCP policy. However to be viable, it is assumed that this Alternative would comply with all other development standards related to non-residential intensity requirements such as building height, open space standards, and noise abatement. Conversely, implementing the types of uses associated with this Alternative may result in impacts related to the proposed uses and the adjacent sensitive receptors. Additionally, the asbestos and potential lead-based paint in the existing building materials would still be present and have to be legally disposed of in order to reuse the site and make it residential. Therefore, impacts related to Hazards and Hazardous Materials would be similar to that of the proposed Project.

#### *Land Use and Planning*

This Alternative would develop the site consistent with RCALUCP policy. However, to be viable, it is assumed that this Alternative would comply with all other development standards related to non-residential intensity requirements and City development standards such as building height, open space requirements, setbacks, and noise abatement. As such, this Alternative would not conflict with City's GP 2025 policies related to airports. Conversely, implementing the types of uses associated with this Alternative may result in impacts related to the proposed uses and the adjacent sensitive receptors and result in additional land use policy conflicts Therefore, impacts related to Land Use and Planning would be similar to that of the proposed Project.

#### *Transportation*

The City would condition roadway improvements as needed for any proposed project. Therefore, even if this Alternative was not built as contemplated, another proposed project would still be conditioned to

build any necessary roadway improvements and contribute fair share fees as applicable. As such, cumulative impacts to transportation/traffic would remain significant since the priority and timing of road improvements are not under the sole control of a project proponent. While traffic volumes would be significantly lower under this Alternative, similar cumulative traffic impacts would still occur. Therefore, Project impacts to transportation/traffic would be similar to that of the proposed Project.

**Relationship of Alternative 3 to Project Objectives**

The ALUC Consistent Alternative would develop the site with no residential dwelling units and non-residential uses such as a warehouse or airport hangers no larger than the current building square footage of approximately 178,000 sf. This Alternative would also include demolition of the existing Sears Buildings. An analysis of whether Alternative 3 meets each Project objective is provided in **Table 8.0-D, Alternative 3: ALUC Consistent Project Objectives Comparison.**

**Table 8.0-D, Alternative 3: ALUC Consistent Project Objectives Comparison**

Project Objective	Alternative Meets Objective?
Primarily, provide quality, multi-family housing on an existing underutilized site, to help the City’s meet the State’s allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers, as well as the City’s overarching self-prescribed housing unit numbers.	<b>No.</b> Alternative 3 would not provide residential, multifamily land uses, since none are considered RCALUCP compatible.
Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.	<b>No.</b> Alternative 3 would not include housing since non would be allowed under the RCALUCP.
Place housing near existing commercial uses to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.	<b>No.</b> Alternative 3 not include housing since the RCALUCP does not allow housing on this site.
Provide compatible mixed-use development contributing to the character of the surrounding neighborhood.	<b>No.</b> Alternative 3 would not allow for any residential uses due to the proximity to airport so would not provide any housing which would be a part of a mixed use development.
Establish a mixed-use development that will provide a land use transition between the existing commercial Hardman Center and the residential developments surrounding the project site.	<b>No.</b> Alternative 3 would not allow for any residential uses due to the proximity to airport so would not provide any housing which would be a part of a mixed use development.

**Alternative 3 Conclusion**

Alternative 3 would result in similar impacts to cultural, hazards/hazardous materials and land use planning. Alternative 3 would likely result in fewer traffic trips and as such, result in less direct impacts related to air quality energy consumption, and noise impacts when compared to the proposed Project.



However, Alternative 3 would also increase the sources of diesel exhaust in the Project area and therefore increase the health risks to nearby sensitive uses compared to the proposed Project. However, all of these topics were found to be less than significant as part of the proposed Project. Alternative 3 would result in less impacts to GHG than the Project and Alternative 3 would still result in similar impacts to cumulative traffic/transportation impacts. Alternative 3 would not satisfy any of the Project Objectives and does not meet the primary objective of the proposed Project, which is to provide additional housing to meet the City's RHNA allocations. Given the nature of development that would occur on this site and its potential incompatibility with existing surrounding sensitive uses and potential for additional impacts, Alternative 3 is rejected as infeasible. Additionally, Alternative 3 would result in similar impacts to the existing structure so its historical context and significance would still be impacted. Therefore, Alternative 3 is considered not feasible, and does not meet any of the Project Objectives.

#### **8.5.4. Alternative 4: Reduced Density/Intensity**

Although the Project does not include significant vehicle miles traveled impacts, nor does it result in significant air quality impacts, implementation of the Project will increase existing vehicle emissions which could increase existing impacts related to air quality due to the passenger vehicles generated by the Project. Additionally, the Project will result in significant impacts to greenhouse gases mostly because of the traffic generated by the proposed uses. Additionally, concerns were raised during the NOP comment period of additional traffic impacts in terms of level of service. However, it should be noted that in 2020, CEQA removed traffic impacts and level of service as areas of potential impacts that have to be evaluated. Rather, CEQA now addresses traffic impacts in the form of vehicle miles traveled (VMT). Based on all this, a reduced density alternative could alleviate some of these concerns. To reduce vehicle miles traveled as well as the greenhouse gas emissions, from the use of cars, Alternative 4 would propose to provide less residential units and less commercial square footage (25 percent reduction) in order to reduce vehicle trips as reflected in **Table 8.0-E, Alternative 4 Density Reduction** below. A 25 percent reduction was chosen as this is a typical reduction size to still allow for development that makes market sense so it would be realistic, but also allows for a reduction in the cars that would use the site that would also result in a valuable reduction of emissions.

**Table 8.0-E, Alternative 4 Density Reduction**

Land Use	Alternative 4 Reduced Density <sup>1</sup>	Proposed Project
Residential	291 Units	388 Units
Commercial	18,990 square feet	25,320 square feet
Notes:		
1. 25 percent reduction from proposed Project		

## Alternative’s Impact Analysis

### *Cultural Resources*

This Alternative would still require demolition of the existing structures. Like the proposed Project, this Alternative would result impacts related to historical resources. Therefore, impacts related to cultural resources would be similar to that of the proposed Project.

### *Greenhouse Gas Emissions*

Alternative 4 would reduce the amount of the Project density by 25%. Even with this decrease in units and commercial square footage, it is expected that Alternative 4 would still generate total GHG emissions which exceed the 3,000 MTCO<sub>2</sub>E/yr threshold. The Project results in 7,374.37 total CO<sub>2</sub>, and a 25% reduction of that number could still exceed the 3,000 MTCO<sub>2</sub>E/yr threshold. Therefore, this Alternative would most likely have similar impacts as the Project; significant and unavoidable related to GHG.

### *Hazards and Hazardous Materials*

As discussed in 8.5.3 above, the addition of any residential units beyond two units on this site, would result in inconsistency with RCALUCP policy. Thus, this Alternative would be inconsistent with RCALUCP policies. Therefore, impacts related to Hazards and Hazardous Materials would be similar to that of the proposed Project.

### *Land Use and Planning*

As discussed in 8.5.3 above, the addition of any residential units beyond two units on this site, would result in inconsistency with RCALUCP policy. Since this Alternative would be inconsistent with RCALUCP policy, similar to the proposed Project, this Alternative would also conflict with the City’s GP 2025 land use policies related to airports. Therefore, impacts related to Land Use and Planning would be similar to that of the proposed Project.

### *Transportation*

Under this Alternative, the site would still develop with residential and commercial uses. Development of the site with these uses would result in passenger vehicles trips to and from to the site but at a lower volume than the proposed Project. The City would require applicable roadway improvements for any project. Even if this Alternative was not built as contemplated, another project would still be conditioned to build any necessary roadway improvements and contribute fair share fees. As such, cumulative impacts to transportation/traffic would remain significant since the priority and timing of road

improvements are not under the sole control of a project proponent. Thus, this Alternative would result in similar cumulative traffic impacts. Therefore, Project impacts to cumulative transportation/traffic would be similar to that of the proposed Project.

### Relationship of Alternative 4 to Project Objectives

The Reduced Density Alternative would develop the site as a smaller mixed-use site by reducing residential units and commercial square footage area by approximately 25 percent resulting in 291 residential units and approximately 18,990 sf of commercial space. Alternative 4 would still require the 1.5 miles of off-site impacts located within roadway right-of-way to connect to existing Riverside Public Utilities (RPU) facilities located on Mountain View Avenue. An analysis of whether Alternative 4 meets each Project objective is provided in **Table 8.0-F, Alternative 4: Reduced Density Project Objectives Comparison**.

**Table 8.0-F, Alternative 4: Reduced Density/Intensity Project Objectives Comparison**

Project Objective	Alternative Meets Objective?
Primarily, provide quality, multi-family housing on an existing underutilized site, to help the City’s meet the State’s allocated 2021-2029 Regional Housing Needs Assessment (RHNA) housing unit numbers, as well as the City’s overarching self-prescribed housing unit numbers.	<b>Yes, but to a lesser degree.</b> Alternative 4 would provide quality, multifamily housing, but less units would be provided.
Place housing near a transit corridor to reduce residential vehicle miles traveled and associated congestion and greenhouse gas emissions.	<b>Yes, to a lesser degree.</b> Alternative 4 would provide housing near a transit corridor and result in less vehicle miles traveled and less greenhouse gas emissions.
Place housing near existing commercial uses to encourage pedestrian connectivity and to reduce vehicular usage and associated impacts.	<b>Yes.</b> Alternative 4 would place housing near existing commercial uses and still encourage pedestrian connectivity.
Provide compatible mixed-use development contributing to the character of the surrounding neighborhood.	<b>Yes.</b> Alternative 4 would provide mixed use development and contribute to the character of the neighborhood.
Establish a mixed-use development that will provide a land use transition between the existing commercial Hardman Center and the residential developments surrounding the project site.	<b>Yes.</b> Alternative 4 would provide mixed use development that would serve as a transition from the Hardman Center to the surrounding residential developments around the site.

### Alternative 4 Conclusion

Alternative 4 (Reduced Project Size) would reduce development of the Project site by 25 percent in comparison to the proposed Project site. Nonetheless, Alternative 4 still results in significant unavoidable impacts related to GHG, historic resources and airport land use compatibility. However,

Alternative 4 would propose the same land uses as the Project, require a rezone and general plan amendment as well as demolition of the existing Sears building. By reducing the density of the Project which reduces the vehicles and therefore air quality emissions, Alternative 4 would create lesser impacts to VMT and air emissions. However, the Project as proposed already had less than significant VMT and air quality impacts. However, GHG emissions would likely still exceed thresholds as does the Project and significant and avoidable impacts from GHG would exist for this Alternative.

Although Alternative 4 meets the Project Objectives, these objectives are met to a lesser degree than the proposed Project, especially the key objective to meet the City's RHNA allocations. Furthermore, Alternative 4 reduces the Project site by 25 percent. The demand for residential sites within the City of this size, attendant land costs and the low Inland Empire market lease rates for product of this type, Alternative 4 would result in a return on investment too low to justify the cost and risk of investment. Due to all of these factors, a reasonable developer would not take the risk to develop the Reduced Project Size Alternative. For these reasons, Alternative 4 is rejected as infeasible.



## 8.6. Comparison of Alternatives

The matrix approach to comparing the alternatives is used for ease of directly comparing the proposed Project's significant effects with those of the alternatives, per State *CEQA Guidelines* Section 15126.6(d). The potential environmental impacts of each alternative are ranked as greater, similar, or less than the proposed Project with respect to each topic discussed in the DEIR, as shown in **Table 8.0-G, Comparison of Impacts from Project Alternatives**

**Table 8.0-G, Comparison of Impacts from Project Alternatives**

Environmental Issue	Alternative 1: No Development/Keep Existing Commercial Designation	Alternative 2: Adaptive Reuse to Residential	Alternative 3: ALUC Consistency	Alternative 4: Reduced Density/Intensity
<b>Cultural Resources</b> <i>Project and Cumulative</i>	<b>Same</b> – Alternative would not require the demolition of the existing structures. However, modifications to the structures would still be required to bring them into compliance with current building and seismic codes to a degree that would not result in the preservation of a historic resource. Therefore, impacts related to cultural resources would be similar to that of the proposed Project.	<b>Same</b> – Alternative would still require modifications to a degree that would not result in the preservation of a historic resource. Therefore, cultural resource impacts would be the same as the proposed Project.	<b>Same</b> – Alternative would still require demolition of historic resources. Therefore, cultural resource impacts would be similar to the proposed Project.	<b>Same</b> – Alternative would still require demolition of historic resources. Therefore, cultural resource impacts would be similar to the proposed Project.
<b>Greenhouse Gas Emissions</b> <i>Project and Cumulative</i>	<b>Greater</b> – The fully commercial use of the site under Alternative 1 would increase the GHG emissions and further exceed thresholds.	<b>Less</b> – the uses under this Alternative would most likely not result in GHG emissions that would exceed standards.	<b>Less</b> – the uses under this Alternative would most likely not result in GHG emissions that would exceed standards.	<b>Same</b> – although the residential and commercial uses would be reduced by this Alternative, there would still be uses to generate mobile source and other emissions that would most likely exceed thresholds.

**Table 8.0-G, Comparison of Impacts from Project Alternatives**

<b>Environmental Issue</b>	<b>Alternative 1: No Development/Keep Existing Commercial Designation</b>	<b>Alternative 2: Adaptive Reuse to Residential</b>	<b>Alternative 3: ALUC Consistency</b>	<b>Alternative 4: Reduced Density/Intensity</b>
<p><b>Hazards and Hazardous Material</b>  <i>Project and Cumulative</i></p>	<p><b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP. Therefore, hazards/hazardous material impacts would be the same as the proposed Project.</p>	<p><b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP. Therefore, hazards/hazardous material impacts would be the same as the proposed Project.</p>	<p><b>Same</b> – Alternative would propose uses consistent with RCALUCP development standards. As such, this Alternative would be consistent with RCALUCP policies. However, use may not be compatible with existing surrounding sensitive receptors. Therefore, hazards /hazardous material impacts would be similar to the proposed Project.</p>	<p><b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP. Therefore, hazards/hazardous material impacts would be the same as the proposed Project.</p>
<p><b>Land Use</b>  <i>Project and Cumulative</i></p>	<p><b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP and as such, inconsistency with General Plan land use objectives and policies as they relate to airports. Therefore, land use and planning impacts would be the same as the proposed Project.</p>	<p><b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP and as such, inconsistency with General Plan land use objectives and policies as they relate to airports. Therefore, land use and planning impacts would be the same as the proposed Project.</p>	<p><b>Same</b> – Alternative would propose uses consistent with RCALUCP development standards. Because this Alternative would be consistent with the RCALUCP, it would not result in inconsistencies with General Plan land use objectives and policies as they relate to airports. However, use may not be compatible with existing surrounding sensitive receptors. Therefore, land use and planning impacts</p>	<p><b>Same</b> – Alternative would still result in an inconsistency determination with the RCALUCP and as such, inconsistency with General Plan land use objectives and policies as they relate to airports. Therefore, land use and planning impacts would be the same as the proposed Project.</p>

**Table 8.0-G, Comparison of Impacts from Project Alternatives**

Environmental Issue	Alternative 1: No Development/Keep Existing Commercial Designation	Alternative 2: Adaptive Reuse to Residential	Alternative 3: ALUC Consistency	Alternative 4: Reduced Density/Intensity
			would be similar to the proposed Project.	
<b>Transportation</b> <i>Cumulative</i>	<b>Greater</b> – Under the existing land use, the existing site would generate approximately 1,326 more trips than that of the proposed Project. Thus, this Alternative would result in similar cumulative traffic impacts but Project-specific impacts would be greater than of the proposed Project.	<b>Same</b> – There would be less traffic originating to and from the Project area because of reduced density and intensity. However, cumulative traffic impacts would remain similar to the proposed Project.	<b>Same</b> – There would be less traffic originating to and from the Project area because the uses would be less intense. But cumulative traffic impacts would remain similar to the proposed Project.	<b>Same</b> – There would be less traffic originating to and from the Project area because of reduced density and intensity. However, cumulative traffic impacts would remain similar to the proposed Project.
<b>Environmentally Superior to Proposed Project?</b>	<b>No</b>	<b>Yes, but to a lesser degree</b>	<b>Yes, but to a lesser degree</b>	<b>Yes, but impacts similar</b>
<b>Meets Most of the Project Objectives?</b>	<b>No</b> (0 of 5 Objectives Met)	<b>Yes, but to a lesser degree</b> (3 of 5 Objectives Met)	<b>No</b> (0 of 5 Objectives Met)	<b>Yes, but to a lesser degree</b> (5 of 5 Objectives Met)

### 8.6.1. Environmentally Superior Alternative

The State *CEQA Guidelines*, Section 15126.6(e)(2), requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, the No Project alternative is the environmentally superior alternative with respect to reducing impacts created by the proposed Project. However, the beneficial impacts of the proposed Project would not be realized. The State *CEQA Guidelines* also require the identification of another environmentally superior alternative if the No Project alternative is selected as the environmentally superior alternative. The following four Alternatives were reviewed for consideration of the environmentally superior alternative.

Alternative 1: No Development/Keep Existing Commercial Designation, results in greater impacts than the proposed Project and does not meet any of the Project Objectives. As such, this Alternative is rejected from consideration.

Alternative 2: Adaptive Reuse, results in similar impacts to the proposed Project but overall would result in less impacts than the proposed Project. The uses under this Alternative would most likely not result in GHG emissions that would exceed standards. However, when compared to the proposed Project, this Alternative does not have the ability to lessen impacts to the historic resources so will result in similar impacts to that of the proposed Project. Further, this Alternative meets only 3 of the 5 Project Objectives and to a lesser degree. As such, this Alternative is rejected from further consideration.

Alternative 3: ALUC Consistency, results similar impacts to the proposed Project but overall would result in less impacts than the proposed Project since the uses under this Alternative would most likely not result in GHG emissions that would exceed standards. However, this Alternative does not meet any of the Project Objectives so is rejected from further consideration.

Alternative 4: Reduced Density/Intensity, results similar impacts to the proposed Project and meets all of the Project Objectives but to a lesser degree than the proposed Project because Alternative 4 would reduce the size of the commercial buildings and amount of residential units by approximately 25 percent. As such, this Alternative would still provide more housing than the other Alternatives, which is a key objective. Hence, Alternative 4 is the environmentally superior alternative.

While the City of Riverside has examined a reasonable range of alternatives to the proposed Project site and Alternative 4 meets most of the Project Objectives and is environmentally superior to the proposed Project, the degree of which Alternative 4 reduces impacts to GHG emissions and Transportation is minimal when compared to the proposed Project. Since Alternative 4 is proposing to implement residential uses on the site impacts to GHG and Transportation would still exceed existing levels and thus still create an impact.

Alternative 4, when compared to the proposed Project, would meet all of the basic Project Objectives found in Section 3.0 – Project Description of this Draft EIR but to a lesser degree, because it fails to maximize the site location and surrounding features through site design and building placement since it offers a reduced density/intensity project; resulting in an increased the demand for development at other sites in the area. Further, while this Alternative would capitalize on the City’s Smart Growth principals, it would do so at a lesser degree than the proposed Project by offering smaller commercial structures and fewer dwelling units. Lastly, while this Alternative would provide housing opportunities allowing the City to help meet its RHNA allocations, it would do so at a lesser degree than the proposed Project.



Alternative 4 would result in essentially the same level of impacts as the proposed Project but would not meet all of the basic Project Objectives found in Section 3.0 - Project Description of this Draft EIR.

The proposed Project will result in significant and unavoidable impacts even after implementation of mitigation. Likewise, Alternative 4 (as well as Alternatives 1 through Alternative 3) will also result in similar significant unavoidable impacts. Therefore, none of the Alternatives will effectively lessen or avoid significant impacts that otherwise result from the proposed Project.

## 9.0 References

As discussed in Section 2.0 – Introduction of this Draft EIR, Section 15150 of the State *CEQA Guidelines* permits and encourages an environmental document to incorporate, by reference, other documents that provide relevant data. The documents summarized below are incorporated by reference, and the pertinent material is summarized throughout this Draft EIR, where that information is relevant to the analysis of potential impacts of the Project. All documents incorporated by reference are available for review at, or can be obtained through, the City of Riverside Planning Department.

GP 2025	City of Riverside, <i>General Plan 2025</i> , Approved November 2007. (Available at <a href="https://riversideca.gov/cedd/planning/city-plans/general-plan-0">https://riversideca.gov/cedd/planning/city-plans/general-plan-0</a> , accessed June 28, 2023.)
GP 2025 FEIR	City of Riverside, <i>General Plan Final Environmental Impact Report (SCH No. 2004021108)</i> , certified November 2007. (Available at <a href="https://riversideca.gov/cedd/planning/city-plans/general-plan-0">https://riversideca.gov/cedd/planning/city-plans/general-plan-0</a> , accessed June 28, 2023.)
GPUI	City of Riverside, <i>Phase I General Plan Update</i> , Approved October 5, 2021. (Available at <a href="https://riversideca.gov/cedd/planning/city-plans/general-plan-0">https://riversideca.gov/cedd/planning/city-plans/general-plan-0</a> , accessed June 28, 2023.)
GPUI FEIR	City of Riverside, <i>Phase I General Plan Update Final Environmental Impact Report (SCH No. 2021040089)</i> , certified October 5, 2021. (Available at <a href="https://riversideca.gov/cedd/planning/city-plans/general-plan-0">https://riversideca.gov/cedd/planning/city-plans/general-plan-0</a> , accessed June 28, 2023.)
GP 2025	City of Riverside, <i>General Plan 2025</i> , Approved November 2007. (Available at <a href="https://riversideca.gov/cedd/planning/city-plans/general-plan-0">https://riversideca.gov/cedd/planning/city-plans/general-plan-0</a> , accessed June 28, 2023.)
MC	City of Riverside, <i>Municipal Code</i> , Updated July 26, 2023. (Available at <a href="http://www.riversideca.gov/municode/">http://www.riversideca.gov/municode/</a> accessed July 29, 2023.)

Additional reference materials that were used in the preparation of this Draft EIR include the following:

### Section 1.0 – Executive Summary

ALUC-A	County of Riverside, Airport Land Use Commission, Landscaping Near Airports: Special Considerations for Preventing or Reducing Wildlife Hazards to Aircraft, Table 2 - Acceptable Plants from Riverside County Landscaping Guide. (Available at <a href="https://www.rcaluc.org/Portals/13/PDFGeneral/Resources/BROCHUREFINALEDALandscapeletter.pdf?ver=2018-12-28-084424-067">https://www.rcaluc.org/Portals/13/PDFGeneral/Resources/BROCHUREFINALEDALandscapeletter.pdf?ver=2018-12-28-084424-067</a> , accessed September 26, 2022.)
COR GP	County of Riverside, General Plan – Appendix E-2: Socioeconomic Buildout Assumption Projections & Methodology, Revised April 11, 2017. (Available at <a href="https://planning.rctlma.org/General-Plan-Zoning/General-Plan">https://planning.rctlma.org/General-Plan-Zoning/General-Plan</a> , accessed December 6, 2022.)
DUDEK-A	Dudek, Cultural Technical Resource Report, dated May 2023 (Appendix C)

- RCALUCP County of Riverside - Airport Land Use Commission, Riverside County Airport Land Use Compatibility Plan, Adopted March 2005. (Available at <https://rcaluc.org/current-compatibility-plans>, accessed July 28, 2023.)
- RCDG-A City of Riverside, Riverside Citywide Design Guidelines, Appendix C: Water Efficient Landscape and Irrigation Design Guidelines, Amended January 15, 2019. (Available at [https://riversideca.gov/cedd/sites/riversideca.gov.ceedd/files/pdf/planning/Citywide\\_Design\\_and\\_Sign\\_Guidelines\\_web%20version\\_Amended%2001-15-19\\_1.pdf](https://riversideca.gov/cedd/sites/riversideca.gov.ceedd/files/pdf/planning/Citywide_Design_and_Sign_Guidelines_web%20version_Amended%2001-15-19_1.pdf), accessed September 26, 2022.)
- RUHS Riverside University Health System, Farmer's Market Locations. (Available at <https://www.ruhealth.org/farmers-market>, accessed September 28, 2022.)
- WEIS-A Weis Environmental, Phase I Environmental Site Assessment 5261 Arlington Avenue Riverside, California 92504. November 11, 2021. (Appendix D)

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- GP 2025 FEIR City of Riverside, *General Plan Final Environmental Impact Report (SCH No. 2004021108)*, certified November 2007. (Available at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>, accessed June 28, 2023)
- GPUI City of Riverside, *Phase I General Plan Update*, Approved October 5, 2021. (Available at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>, accessed June 28, 2023.)
- GPUI FEIR City of Riverside, *Phase I General Plan Update Final Environmental Impact Report (SCH No. 2021040089)*, certified October 5, 2021. (Available at <https://riversideca.gov/cedd/planning/city-plans/general-plan-0>, accessed June 28, 2023.)
- MC City of Riverside, *Municipal Code*, Updated July 26, 2023. (Available at <http://www.riversideca.gov/municode/> accessed July 29, 2023.)

## Section 3.0 – Project Description

- ALUC-A County of Riverside, Airport Land Use Commission, *Landscaping Near Airports: Special Considerations for Preventing or Reducing Wildlife Hazards to Aircraft, Table 2 - Acceptable Plants from Riverside County Landscaping Guide*. (Available at <https://www.rcaluc.org/Portals/13/PDFGeneral/Resources/BROCHUREFINALEDALandscapeletter.pdf?ver=2018-12-28-084424-067>, accessed September 26, 2022.)
- COR GP County of Riverside, *General Plan – Appendix E-2: Socioeconomic Buildout Assumption Projections & Methodology, Revised April 11, 2017*. (Available at <https://planning.rctlma.org/General-Plan-Zoning/General-Plan>, accessed December 6, 2022.)
- DUDEK-A Dudek, *Cultural Technical Resource Report*, dated May 2023 (Appendix C)

RCALUCP County of Riverside - Airport Land Use Commission, *Riverside County Airport Land Use Compatibility Plan*, Adopted March 2005. (Available at <https://rcaluc.org/current-compatibility-plans>, accessed July 28, 2023.)

RCDG-A City of Riverside, *Riverside Citywide Design Guidelines, Appendix C: Water Efficient Landscape and Irrigation Design Guidelines*, Amended January 15, 2019. (Available at [https://riversideca.gov/cedd/sites/riversideca.gov.ceedd/files/pdf/planning/Citywide\\_Design\\_and\\_Sign\\_Guidelines\\_web%20version\\_Amended%2001-15-19\\_1.pdf](https://riversideca.gov/cedd/sites/riversideca.gov.ceedd/files/pdf/planning/Citywide_Design_and_Sign_Guidelines_web%20version_Amended%2001-15-19_1.pdf), accessed September 26, 2022.)

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### Section 5.1 – Aesthetics

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UFPM City of Riverside Public Works, *Urban Forestry Policy Manual*, Revised August 2015. (Available at <https://riversideca.gov/publicworks/trees/pdf/UrbanForestry-TOC.pdf>, accessed February 6, 2023.)

### Section 5.2 – Air Quality

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Rule 403 South Coast Air Quality Management District, *Rule 403 Fugitive Dust*, June 3, 2005. (Available at <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>, accessed July 24, 2023.)

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