CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT **PLANNING DIVISION**

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

WARD: 2

1. **Case Number:** PC-2025-00541 (General Plan Amendment, Canyon Springs Business Park Specific Plan Amendment, Rezone, Tentative Tract Map No. 39251, and Design Review)

2. **Project Title:** Independence at Canyon Springs

3. **Hearing Date:** December 3, 2026

4. **Lead Agency:** City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

5. **Contact Person:** Candice Assadzadeh, Senior Planner
Phone Number: (951) 826-5667

6. **Project Location:** The Project site encompasses 9.13 acres and is located at the northwest corner of Gateway Drive and Canyon Park Drive in the City of Riverside and is identified as Assessor Parcel Numbers (APNs) 291-440-003, -005, -006, and -007. The Project site is located in Section 3, Township 3 South, Range 4 West of the San Bernardino Meridian. Refer to Figure 1, Regional and Local Vicinity Map, and Figure 2, Aerial Photograph.

7. **Project Applicant/Project Sponsor's Name and Address:**

   James Kim
   LS BTR Development, LLC
   c/o Lewis Management Corp
   1156 N. Mountain Avenue
   Upland, CA 91786

8. **General Plan Designation:** The Project site is designated as C – Commercial in the City of Riverside General Plan Land Use Policy Map (Figure LU-10 of the Land Use and Urban Design Element).

9. **Zoning:** The Project site is zoned O-SP: Office and Specific Plan Overlay (Canyon Springs Business Park) Zones on the City's Zoning Map.

10. **Description of Project:** The Project Applicant is requesting consideration of the following entitlements for the construction of a 156-unit multi-family residential development: 1) General Plan Amendment to amend the General Plan Land Use Designation from C – Commercial to MU-U – Mixed-Use – Urban; 2) Zoning Code Map Amendment to rezone the property from O – Office Zone to MU-U – Mixed-Use – Urban Zone; 3) Specific

Plan Amendment to amend the Canyon Springs Business Park Specific Plan to create the Mixed-Use – Urban Zone within the Specific Plan; 4) Tentative Tract Map to create a single lot for condominium purposes; and 5) Design Review of Project Plans. The proposed Project would also include circulation and parking, open space/landscaping, lighting, walls/fences, and utility infrastructure as needed to serve the proposed uses. These proposed Project components, which comply with the development requirements outlined in the proposed Specific Plan Amendment, are further described below. The conceptual site plan for the proposed Project is provided in Figure 3.

Residential Uses

The proposed Project would provide 156 two-story residential (apartment) units in 78 duplexes (17.1 dwelling units per acre [du/ac]). Five floor plans are proposed including 2 bedroom/2 bath and 3 bedroom/2.5 bath floor plans. The residential units would range from 1,176 square feet (sf) to 1,819 sf.

The proposed buildings would have varied elevations with heights ranging from 26 feet, 5 inches to 29 feet, 9 inches above ground level. Representative building elevations are provided on Figure 4 through Figure 8, and representative renderings as viewed from Gateway Drive and Canyon Park Drive are provided on Figure 9 and Figure 10, respectively. The architecture is a distinct Spanish style characterized by low- to moderate-pitched "S"-tile roofs, stucco wall surfaces, and decorative accents like tilework, metal elements, and shaded entryways. The color palette includes warm neutral stucco tones, terra-cotta and brown roof colors, and deeper accent hues in greens and browns for elements like shutters and trim. Where units front onto Gateway Drive and Canyon Park Drive, entry and front-yard spaces would be defined by arbors, which create transitions from public walkways to private entrances.

Amenities

The proposed Project would include the following resident amenities that would be provided in separate structures as shown on the conceptual site plan provided on Figure 3: a 1,308-sf leasing office, a 2,095-sf fitness building, a 600-sf maintenance building, a 255-sf mail pavilion, and a 448-sf trash enclosure. With the exception of the trash enclosure, which would be located in the northwest portion of the Project site, these amenities would be located in the central portion of the community. As shown on the conceptual building elevations provided on Figure 11 through Figure 15, these would be single-level structures ranging in height from 9 feet, 7 inches (trash enclosure) to 18 feet, 8 inches (fitness center). The architecture would be similar to the proposed residential uses to provide visual conformity.

Resident amenities that would be provided in the on-site recreation area include a pool, spa, sun deck and cabana shade structure. There would also be an enclosed dog park northeast of the recreation area.

Circulation and Parking

<u>Vehicular Circulation</u>

The Project site is bound by Gateway Drive to the south and Canyon Park Drive to the east. These are collector roadways with two lanes in each direction and on-street parking on both sides of the road. Vehicle access to the Project site would be provided via two driveways, one full-access driveway on Gateway Drive and one exit-only gated driveway on Canyon Park Drive that would also provide emergency vehicle access. Both driveways are proposed to be unsignalized with stop control on the driveway approach. Internal roadways would be constructed and would meet applicable requirements for fire access, emergency access, and trash trucks (e.g., lane width, turning radius) as shown on Figure 16.

Non-Vehicular Circulation

There are existing sidewalks on both sides of Gateway Drive and Canyon Park Drive adjacent to the Project site. Sidewalks are also provided along most roadways near the Project site where land uses have been developed adjacent to the roadway. Additionally, most signalized intersections in the vicinity of the Project site have marked crosswalks or pedestrian signals, except for the eastbound approach at the Valley Springs Parkway and Eucalyptus Avenue intersection. Bicycle racks would be provided on-site to facilitate bicycle travel.

The proposed Project would accommodate pedestrian circulation through a network of internal pedestrian facilities within the Project site that would connect to existing pedestrian sidewalks located along the Project frontage with Canyon Park Drive and Gateway Drive (refer to the pedestrian circulation plan provided on Figure 17). Traffic calming features would be installed (e.g. raised pedestrian walkways or speed cushions along the internal north-south roads to help slow down traffic). Additionally, existing crosswalks at the intersection of Campus Parkway and Canyon Park Drive would be upgraded to continental crosswalks and painted.

Parking

Attached garages (one- and two-car) would be provided for each residential unit. Units with a one-car garage would also be provided with a parking stall adjacent to or near the residence. The proposed Project would provide a total of 365 parking spaces, which would exceed the required 312 parking spaces. Of the parking spaces provided, 308 parking spaces would be provided for residents, which would include 251 garage stalls and 57 partially covered surface stalls. Guests would be provided with 57 surface parking spaces, including 27 standard spaces, 21 parallel spaces, 5 compact spaces, 2 standard handicap spaces, and 2 standard handicap van parking spaces.

Landscaping, Open Space, and Lighting

The proposed preliminary landscape plan is provided on Figure 18 and the proposed open space plan is provided on Figure 19. The proposed landscape design includes decorative walls, shrubs, and trees to provide privacy to the proposed home from the public streets. Landscaping would consist of drought-resistant ground covers, shrubs, and trees. The existing street trees along Canyon Park Drive and Gateway Drive would remain. As shown on the open space plan, there would be approximately 79,050 sf of common open space (turf, landscape, hardscape, and pool/spa areas) provided, which exceeds the required 23,400 sf (150 sf per unit). The common open space would represent approximately 19.8 percent of the Project site. Additionally, there would be 45,065 sf of private open space, which exceeds the required 7,800 sf (50 sf per unit).

Exterior lighting would be provided throughout the Project site as necessary for safety, security, and ambiance and would include lighting for the pedestrian walkways, building entryways, and landscape features. A variety of lighting fixtures and illumination levels would be provided, including bollards, gate up-lights, pole lights, floodlights, tree lights, and sconces.

Walls and Fences

As shown on Figure 20a and Figure 20b, walls and fences would be provided around the perimeter of the Project site and internal to the Project site for security and privacy. A courtyard combo wall (stucco wall with terra cotta cap and tubular steel rail fence) would be provided along the Project site frontage with Canyon Park Drive, and a combination of courtyard combo walls, theme walls (stucco finish with terra cotta cap), and tubular steel fence would be provided along the Project site frontage with Gateway Drive. Split-face block walls would be provided along the northern and western sides of the Project site. Internal to the Project site, a theme wall would be provided around the recreation area, and privacy fencing would be provided for residential uses. A tubular steel fence would be provided around the dog park. Entry gates would be provided at the entry to the Project

site along Canyon Park Drive, and at the main entry along Gateway Drive (two gates south of the recreation area).

Utility Infrastructure

Municipal and private utility services necessary to serve the proposed Project are currently available adjacent to or in proximity to the Project site. On-site utility infrastructure necessary to serve the Project, including water, sanitary sewer, drainage, water quality treatment, and dry utilities (e.g., electricity and telecommunications), would be installed within the Project site and would connect to existing utility lines, as described below. The proposed utility infrastructure is conceptual and subject to refinement during final design including specifications required by the utility provider. The existing utility infrastructure in the roadways adjacent to the Project site has sufficient capacity to serve the proposed uses; no new or expanded off-site utility infrastructure beyond the lateral connections and replacement storm drain discussed below are required.

- **Water.** Water services would be provided by Eastern Municipal Water District (EMWD). Domestic water and fire service would be provided to the Project site through lateral connections to the existing 12-inch water mains located beneath Gateway Drive and Canyon Springs Drive (refer to the conceptual utility plan provided on Figure 21a and Figure 21b).

- **Sewer.** Sewer service would be provided by Edgemont Community Services District (ECSD). Sewer service would be provided to the Project site through lateral connections to an existing 8-inch sewer main located beneath Gateway Drive (refer to the conceptual utility plan provided on Figure 21a and Figure 21b).

- **Storm Drains and Water Quality Features.** The City-owned catch basin on southwest corner of the Project site connects to a westerly flowing existing 21-inch reinforced concrete pipe (RCP) storm drain in Gateway Drive, which increases in size to a 48-inch RCP storm drain, 72-inch RCP storm drain, 96-inch RCP storm drain and 120-inch concrete pipe, ultimately discharging into the Tequesquite Arroyo. The existing 21-inch RCP in Gateway Drive is designed to accommodate non-residential development at the Project site, consistent with the current land use designation. Stormwater runoff from the proposed buildings would be collected by multiple roof drains, inlets, and catch basins, which would connect to the proposed on-site storm drain system. Surface area runoff would flow along the proposed curb and gutters and would be collected by multiple catch basins distributed throughout the Project site. All stormwater runoff would be routed for pre-treatment, prior to detention, and would be discharged via a proposed 24-inch storm drain pipe, connecting to the existing catch basin and replacing a portion of the existing 21-inch RCP storm drain pipe in Gateway Drive. A portion of the existing 21-inch RCP storm drain pipe would be replaced to meet the invert requirements of the on-site storm drain lines.

  As shown on the Preliminary Water Quality Management Plan (WQMP) site plan provided on Figure 22, Modular Wetlands Systems (MWS) would be used for stormwater treatment. A detention facility consisting of a solid-walled corrugated metal pipe (CMP) would be installed and stormwater would be released at a rate matching the existing conditions flow rate into the storm drain system. A trash screen would be installed at the on-site junction structure located just upstream of the discharge point into the storm drain system. Stormwater flows exceeding the treatment volume capacity would bypass the treatment system and continue through the private storm drain system, where it would confluence with the existing catch basin on Gateway Drive.

- **Dry Utilities.** Electricity service would be provided by Riverside Public Utilities and telecommunication services would be provided by Charter Communications and Frontier Communications. The proposed Project would be all-electric; therefore, no natural gas service would be provided. On-site electric and telecommunication infrastructure would be installed. The electric service would connect to the existing circuit at the intersection of Canyon Park Drive and Gateway

Drive. Telecommunications would connect to Frontier facilities along Canyon Park Drive and Charter facilities along Gateway Drive.

Construction Activities

For purposes of analysis in this Initial Study, construction of the Project is conservatively expected to begin in January 2027 and last through October 2028; however, construction may be initiated later than January 2027. Construction activities would include site preparation and grading, foundation installation, curb/gutter and paving, building construction (framing and architectural coating), and installation of utilities.

The preliminary grading plan and associated site sections are provided on Figure 23a through Figure 23d. It is estimated that there would be approximately 876 cubic yards (cy) of soil import to the Project site during grading. It is also estimated that maximum depth of cut and fill during excavation would be less than 4 feet. The maximum depth of excavation would be approximately 10 feet below the ground surface (bgs) for the installation of the storm water detention system.

Construction of the proposed Project would require typical construction equipment. The physical impact area associated with the proposed construction activities (including utility connections), staging, and construction worker parking would be limited to the Project site and site adjacent roadways. Off-site roadway improvements would be limited to restriping for the shared bike lanes and on-street parking on both sides of Gateway Drive, and painting for the continental crosswalks at the intersection of Campus Parkway and Canyon Park Drive.

Legislative and Discretionary Approvals

The proposed Project would require the following approvals from the City:

- **Adoption of the Mitigated Negative Declaration**. Adoption of the Mitigated Negative Declaration (MND) in accordance with the California Environmental Quality Act (CEQA), prior to approval of the proposed Project.
- **General Plan Amendment**. The proposed Project includes an amendment to the General Plan land use designation for the Project site as shown on Figure LU-10, Land Use Policy Map. The land use designation would change from C - Commercial to MU-U Mixed Use-Urban (see Figure 24).
- **Canyon Springs Business Park Specific Plan Amendment**. The proposed Project includes amendments to the CSBP Specific Plan, and specifically modifications for Planning Area (PA) 8B. The proposed Specific Plan Amendment would divide existing PA 8 into three areas: PAs 8A, 8B, and 8C. Planning Area 8A and 8C would continue to be designated for Office use and PA 8B (the Project site) would be designated for Mixed Use - Urban uses. The proposed Specific Plan Amendment establishes development standards and signage standards for PA 8B and includes text, table and graphic revisions as needed for the proposed Mixed Use-Urban land use designation. The proposed development, as described above, is consistent with the proposed amendments for PA 8B.
- **Rezone**. The proposed Project includes a change in the zoning for the Project site on the City's Zoning Map from O-SP - Office and Specific Plan (Canyon Springs Business Park) Overlay Zones to MU-U-SP - Mixed Use-Urban and Specific Plan (Canyon Springs Business Park) Overlay Zones (see Figure 25).
- **TTM No. 39251**. The proposed Project includes TTM No. 39251 for condominium purposes to consolidate the existing four lots that comprise the Project site (APNs 291-440-003, -005, -006, and -007) into one lot to accommodate the proposed development (refer to proposed TTM No. 39251 on Figure 26).
- **Design Review**. The proposed Project review and approval of the proposed Project development plans.

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

The on-site and surrounding land uses, land use designations, and zoning are described below.

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant	C - Commercial	Office – Specific Plan Overlay Zone (Canyon Springs Business Park)
North	Vacant land within the Canyon Springs Business Park Specific Plan area (existing PA 8) and the CSBP Specific Plan area with Campus Parkway further to the north and Corporate Centre Place to the northwest. Commercial uses are located north of Campus Parkway and Corporate Centre Place.	C – Commercial CSHCSP – Canyon Springs Healthcare Campus Specific Plan	Office – Specific Plan Overlay Zone (Canyon Springs Business Park) CSHCSP – Canyon Springs Healthcare Campus Specific Plan
East	Canyon Park Drive; vacant land within the Canyon Springs Healthcare Specific Plan area east of Canyon Park Drive. To the northeast (south of Campus Parkway and east of Canyon Park Drive) are office uses.	CSHCSP – Canyon Springs Healthcare Campus Specific Plan	CSHCSP – Canyon Springs Healthcare Campus Specific Plan
South	Gateway Drive; medical center uses, and vacant land south of Gateway Drive in the City of Riverside. Edgemont Elementary School and residential uses in the City of Moreno Valley further to the south.	CSHCSP – Canyon Springs Healthcare Campus Specific Plan	CSHCSP – Canyon Springs Healthcare Campus Specific Plan
West	Riverside County Registrar voter registration office.	C – Commercial CSHCSP – Canyon Springs Healthcare Campus Specific Plan	Office – Specific Plan Overlay Zone (Canyon Springs Business Park) CSHCSP – Canyon Springs Healthcare Campus Specific Plan

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

a. **Regional Water Quality Control Board (RWQCB)**. A National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges from construction sites (State Water Resources Control Board's General Permit for Discharges of Storm Water Associated with Construction Activity [General Construction Permit]).

b. **Eastern Municipal Water District (EMWD)**. Approval of utility connections.

c. **Riverside County Airport Land Use Commission (ALUC).** The Riverside County ALUC reviewed the proposed Project on October 9, 2025, and determined that the proposed Project is consistent with the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IP ALUCP), subject to the identified conditions, which are discussed in the Hazards/Hazardous Materials section of this Initial Study.

13. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

    As described in the Tribal Cultural Resources section of this Initial Study, Agua Caliente, the Pechanga Band of Mission Indians and Soboba Band of Luiseno Indians requested consultation pursuant to Public Resources Code 21080.3.1. The City conducted the requested consultation and mitigation measures have been identified to reduce potential impacts to tribal cultural resources to a less than significant level, should such resources be encountered during construction.

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

    a. Final Program Environmental Impact Report for the City of Riverside General Plan 2025 (State Clearinghouse No. 2004021108)

15. **List of Figures**

Figure 1 Regional and Local Vicinity Map....12
Figure 2 Aerial Photograph....13
Figure 3 Conceptual Site Plan....14
Figure 4 Representative Building Elevation – Building 1....15
Figure 5 Representative Building Elevation – Building 2....16
Figure 6 Representative Building Elevation – Building 3....17
Figure 7 Representative Building Elevation – Building 4....18
Figure 8 Representative Building Elevation – Building 5....19
Figure 9 Conceptual Rendering – Gateway Drive....20
Figure 10 Conceptual Rendering – Canyon Park Drive....21
Figure 11 Building Elevation – Leasing Office....22
Figure 12 Building Elevation – Fitness Building....23
Figure 13 Building Elevation – Maintenance Building....24
Figure 14 Building Elevation – Mail Pavilion....25
Figure 15 Building Elevation – Trash Enclosure....26
Figure 16 Fire/Emergency Vehicle/Trash Truck Access Plan....27
Figure 17 Pedestrian Circulation Plan....28
Figure 18 Preliminary Landscape Plan....29
Figure 19 Open Space Plan....30
Figure 20a Fence and Wall Plan....31
Figure 20b Fence and Wall Plan....32
Figure 21a Conceptual Utility Plan....33
Figure 21b Conceptual Utility Plan....34
Figure 22 Preliminary WQMP Site Plan....35
Figure 23a Preliminary Grading Plan....36
Figure 23b Preliminary Grading Plan....37
Figure 23c Preliminary Grading Plan....38
Figure 23d Preliminary Grading Plan....39
Figure 24 Existing and Proposed Land Use Designation....40
Figure 25 Existing and Proposed Zoning....41
Figure 26 Proposed TTM No. 39251....42
Figure 27 Site Photographs....123
Figure 28 Receptor Locations....124
Figure 29 Modeled Construction Emission Sources....125

Figure 30 Vegetation....126
Figure 31 Pre-Development Hydrology Map....127
Figure 32 Post-Development Hydrology Map....128
Figure 33 Construction Noise Source Locations....129
Figure 34 Operational Noise Source Locations....130

16. **List of Tables**

Table 1 Construction Emissions Summary....52
Table 2 Summary of Peak Operational Emissions....53
Table 3 Construction Localized Significance Summary Construction....55
Table 4 Project GHG Emissions....77
Table 5 Construction Equipment Noise Level Summary....91
Table 6 Operational Noise Level Compliance....92
Table 7 Daytime Project Operational Noise Level Increases....92
Table 8 Nighttime Operational Noise Level Increases....93
Table 9 Project Construction Vibration Levels – Unmitigated....94

17. **List of Appendices**

A General Plan Consistency Analysis
B1 Air Quality Analysis
B2 Construction Health Risk Assessment
C Habitat Assessment and MSHCP Consistency Analysis
D Historical/Archaeological Resources Survey
E Energy Analysis
F Preliminary Geotechnical Investigation
G Greenhouse Gas Analysis
H Phase I Environmental Site Assessment
I1 Preliminary Water Quality Management Plan
I2 Preliminary Hydrology Study
J Noise Analysis
K Transportation Impact Analysis
L Sewer Study

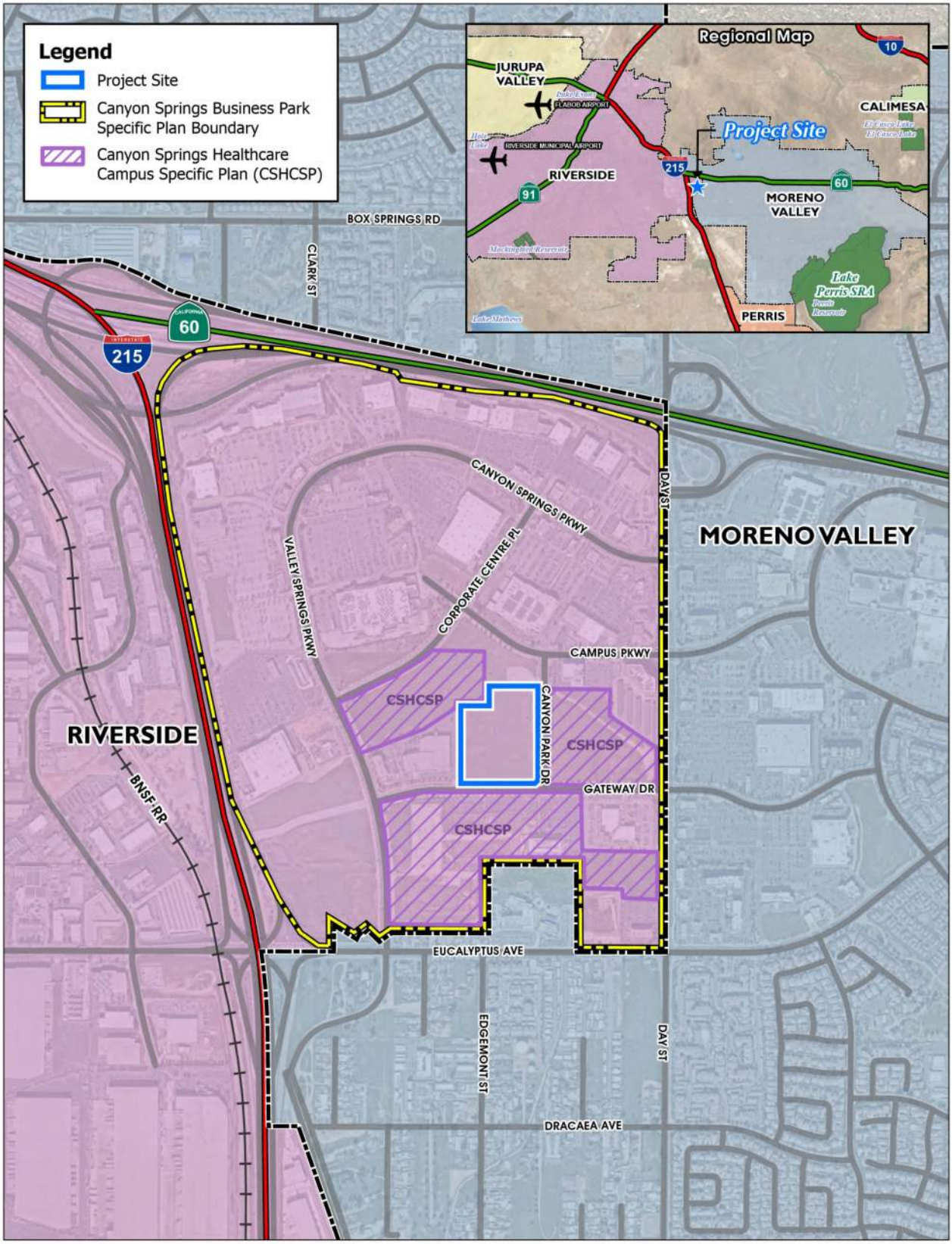
18. **Acronyms**

µg	microgram
AB -	Assembly Bill
AERMOD -	American Meteorological Society/Environmental Protection Agency Regulatory Model
AIA -	Airport Influence Area
ALUC -	Airport Land Use Commission
ALUCP -	Airport Land Use Compatibility Plan
amsl -	Above Mean Sea Level
APN -	Accessor Parcel Number
AQMP -	Air Quality Management Plan
ARB -	Air Resources Board
bgs -	Below the Ground Surface
BMPs -	Best Management Practices
C -	Commercial
C&D -	Construction and Demolition

CAAP - Climate Action and Adaptation Plan
CAAQS - California Ambient Air Quality Standards
CalEEMod - California Emissions Estimator Model
Cal Fire - California Department of Forestry and Fire Prevention
CALGreen - California Green Building Standards Code
CalRecycle - California's Department of Resources Recycling and Recovery
Caltrans - California Department of Transportation
CAP - Climate Action Plan
CARB - California Air Resources Board
CBC - California Building Code
CBSC - California Building Standards Code
CCR - California Code of Regulations
CDFW - California Department of Fish and Wildlife
CEC - California Energy Commission
CEQA - California Environmental Quality Act
CESA - California Endangered Species Act
cfs - Cubic Feet per Second
CH_4 - Methane
CMP - Corrugated Metal Pipe
CNDDB - California Natural Diversity Database
CNEL - Community Noise Equivalent Level
CNPS - California Native Plant Society
CO - Carbon Monoxide
CO_2 - Carbon Dioxide
COA - Conditions of Approval
CPUC - California Public Utility Commission
CPTED - Crime Prevention through Environmental Design
CREC - Controlled Recognized Environmental Condition
CSBP - Canyon Springs Business Park
CSHCSP - Canyon Springs Healthcare Specific Plan
cy - Cubic Yard(s)
dBA - A-weighted decibels
DOF - California Department of Finance
DPM - Diesel Particulate Matter
DTSC - Department of Toxic Substances Control
du/ac - Dwelling Units per Acre
ECSD - Edgemont Community Services District
EIR - Environmental Impact Report
EMWD - Eastern Municipal Water District
ESA - Environmental Site Assessment
EV - Electric Vehicle
FEMA - Federal Emergency Management Agency
FHWA - Federal Highway Administration
FIRM - Flood Insurance Rate Map
FPEIR - Final Programmatic Environmental Impact Report
GCC - Global Climate Change
GHG - Greenhouse Gas
GSA - Groundwater Sustainability Agency
GSP - Groundwater Sustainability Plan
HCP - Habitat Conservation Plan
HRA - Health Risk Assessment
HREC - Historical Recognized Environmental Condition

I -	Interstate
IEPR -	Integrated Energy Policy Report
in/sec -	Inches per Second
ISTEA -	Intermodal Surface Transportation Efficiency Act of 1991
ITE -	Institute of Transportation Engineers
kBTU -	Kilo British Thermal Units
kWh -	Kilowatt Hour
lbs -	Pounds
Leq -	Leq
LHMP -	Local Hazard Mitigation Plan
LST -	Localized Significance Thresholds
MARB/IP -	March Air Reserve Base/Inland Port
MBTA -	Migratory Bird Treaty Act
MEIR -	Maximally Exposed Individual Receptor
MEISC -	Maximally Exposed Individual School Child
MEIW -	Maximally Exposed Individual Worker
MND -	Mitigated Negative Declaration
MPO -	Metropolitan Planning Organization
MRZ -	Mineral Resource Zone
MM -	Mitigation Measure
MS4 -	Municipal Separate Storm System
MSHCP -	Multiple-Species Habitat Conservation Plan
$MTCO_2e$ -	Million Metric Ton of Carbon Dioxide Equivalent
MVUSD -	Moreno Valley Unified School District
MWS -	Modular Wetlands Systems
NAAQS -	National Ambient Air Quality Standards
NAHC -	Native American Heritage Commission
N_2O -	Nitrous Oxide
NO_x -	Nitrogen Oxides
NOI -	Notice of Intent
NPDES -	National Pollutant Discharge Elimination System
O -	Office
OCPs -	Organochlorine Pesticides
PA -	Planning Area
PM_{10} -	Particulate Matter 10 Microns in Diameter or Less
$PM_{2.5}$ -	Particulate Matter 2.5 Microns in Diameter or Less
ppm -	Parts per Million
PPV -	Peak Particle Velocity
PQP -	Public/Quasi-Public
PRC -	Public Resources Code
PRIMMP -	Paleontological Resource Impact Mitigation Monitoring Program
PV -	Photovoltaic
RCA -	Regional Conservation Authority
RCALUC -	Riverside County Airport Land Use Commission
RCHCA -	Riverside County Habitat Conservation Agency
RCNM -	Roadway Construction Noise Model
RCP -	Reinforced Concrete Pipe
REC -	Recognized Environmental Condition
RCFC&WCD -	Riverside County Flood Control and Water Conservation District
RFD -	City of Riverside Fire Department
RHNA -	Regional Housing Needs Assessment
RIVCOM -	Riverside County Model

RMC - Riverside Municipal Code
ROG - Reactive Organic Gases
RPD - Riverside Police Department
RPS - Renewable Portfolio Standard
RPU - Riverside Public Utilities
RRG - Riverside Restorative Growthprint
RTA - Riverside Transit Agency
RTP - Regional Transportation Plan
RWQCB - Regional Water Quality Control Board
RWQCP - Regional Water Quality Control Plant
SB - Senate Bill
SCAB - South Coast Air Basin
SCAG - Southern California Association of Governments
SCAQMD - South Coast Air Quality Management District
SCIC - South Coastal Information Center
SCS - Sustainable Communities Strategy
sf - Square Foot/Feet
SGMA - Sustainable Groundwater Management Act
SJGB - San Jacinto Groundwater Basin
SKR HCP - Stephens' Kangaroo Rat - Habitat Conservation Plan
SO_x - Sulfur Oxides
SR - State Route
SRA - State Responsibility Area
SWPPP - Storm Water Pollution Prevention Plan
SWRCB - State Water Resources Control Board
TAZ - Traffic Analysis Zones
TEA-21 - Transportation Equity Act for the 21st Century
TTM - Tentative Tract Map
USCB - United States Census Bureau
USEPA - U.S. Environmental Protection Agency
USFWS - United States Fish and Wildlife Service
UXR - Urban Crossroads
VHFHSZ - Very High Fire Hazard Severity Zone
VMT - Vehicle Miles Traveled
VOC - Volatile Organic Compound
WQMP - Water Quality Management Plan
WRCOG - Western Riverside Council of Governments
WSA - Water Supply Assessment



Source(s): Esri, Nearmap Imagery (January 2026)

Figure 1

Regional and Local Vicinity Map



Source(s): Esri, Nearmap Imagery (January 2026)

Figure 2

Aerial Photograph

APARTMENTS

NET RENTABLE AREA- INCLUDES WALL THICKNESS OF EXTERIOR WALLS & EXTENDING FROM UNIT-TO-UNIT DEMISING WALL CENTERLINE

	39	25.0%	PLAN 1	1,176 SF, 2 BED, 2 BA
	16	10.3%	PLAN 1Y	1,176 SF, 2 BED, 2 BA
	6	3.8%	PLAN 1Y-ALT	1,176 SF, 2 BED, 2 BA
	14	9.0%	PLAN 2	1,477 SF, 3 BED, 2.5 BA
	2	1.3%	PLAN 2Y	1,477 SF, 3 BED, 2.5 BA
	38	24.4%	PLAN 3	1,606 SF, 3 BED, 2.5 BA
	13	8.3%	PLAN 3Y	1,606 SF, 3 BED, 2.5 BA
	4	2.6%	PLAN 3Y-ALT 1	1,606 SF, 3 BED, 2.5 BA
	4	2.6%	PLAN 3Y-ALT 2	1,622 SF, 3 BED, 2.5 BA
	5	3.2%	PLAN 3X	1,632 SF, 3 BED, 2.5 BA
	12	7.7%	PLAN 4	1,722 SF, 3 BED, 2.5 BA
	3	1.9%	PLAN 5	1,819 SF, 3 BED, 2.5 BA
	156	100.0%		

BUILDING SUMMARY

	Bldg Type	No. of Bldgs	Area Per Building (rsa-sf)	Subtotal	Code Analysis: Occupancy Classification	Type of Construction	Fire Sprinklers	Building Code
Residential	B1	15	2,352	35,280	R-3/U	V-B	13D	CRC 2022
	B1X	8	2,782	22,256				
	B1XY	3	2,782	8,346				
	B1Y	9	2,352	21,168				
	B1YM	1	2,352	2,352				
	B2	10	3,083	30,830				
	B2Y	2	3,083	6,166				
	B2Z	2	2,954	5,908				
	B3	6	3,212	19,272				
	B3Y	4	3,212	12,848				
	B3Y-ALT	4	3,228	12,912				
	B3K	5	3,238	16,190				
	B4	6	3,444	20,664				
	B5	3	3,425	10,275				
	Total	78		224,467				
Common Areas	Leasing Building	1	1,308	1,308	B/S2	V-B	13	CBC 2022
	Fitness Building	1	2,095	2,095	B	V-B	13	
	Maintenance Building	1	600	600	U	V-B	NONE	
	Mail Building	1	255	255	U	V-B	NONE	
	Trash Enclosure	1	448	448	U	V-B	NONE	
	Total	5		4,706				

REQUIRED PARKING

PER SECTION 19.590.060 RMC "Dwelling-Single Family"

	No. of Units	Ratio Required	No. of Stalls	Total
2BD Duplex	61	2	122	312
3BD Duplex	95	2	190	
Total	**156**		312	**312**
Parking Ratio				**2.00**

PROVIDED PARKING

Parking Type	Stall Size	No. of Stalls: Covered	Open	Total
Surface Standard Partially Covered Stalls Plan 1 Floor Plan	9' x 18' (16' + 2' Overhang)	57		308
Garage Stalls	10' x 20'	251		
Surface Standard	9' x 18'		27	57
Surface Compact	9' x 16'+2' OH		5	
Surface Parallel	8' x 22'		21	
Surface Standard HC	9'+5' x 18'		2	
Surface Standard HC Van	9' +8' x 18'		2	
Total		308	57	**365**



PROJECT SUMMARY:

ADDRESS:	**NWC OF GATEWAY DRIVE & CANYON PARK, RIVERSIDE, 92507**
SITE AREA:	**9.13 ACRES (+/- 397,468 SF)**
ZONE:	**CANYON SPRINGS BUSINESS PARK SPECIFIC PLAN**
DENSITY:	**156 UNITS/9.13 AC= 17.1 DU/AC**
TOTAL UNITS:	**156**
TOTAL BUILDINGS:	**78 DUPLEXES + 5 COMMON AREA BUILDINGS**
PROPOSED MAX HEIGHT:	**29'-9"**
NO OF STORY:	**2-STORY @ DUPLEXES 1-STORY AT COMMON BUILDINGS**

ENHANCED ELEVATIONS

Source(s): Angeleno Associates, Inc. (01-26-2026)

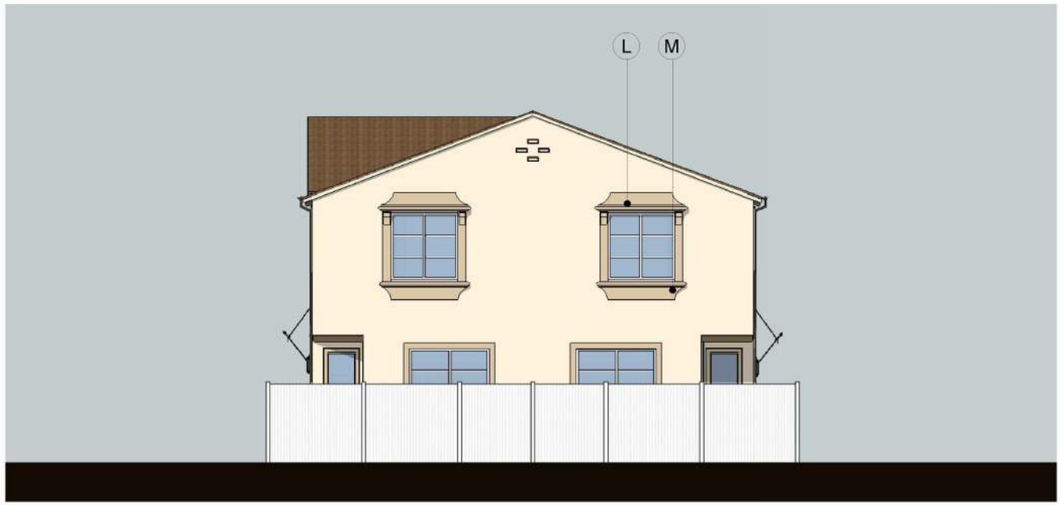
Figure 3

Not to Scale

Conceptual Site Plan



RIGHT ELEVATION



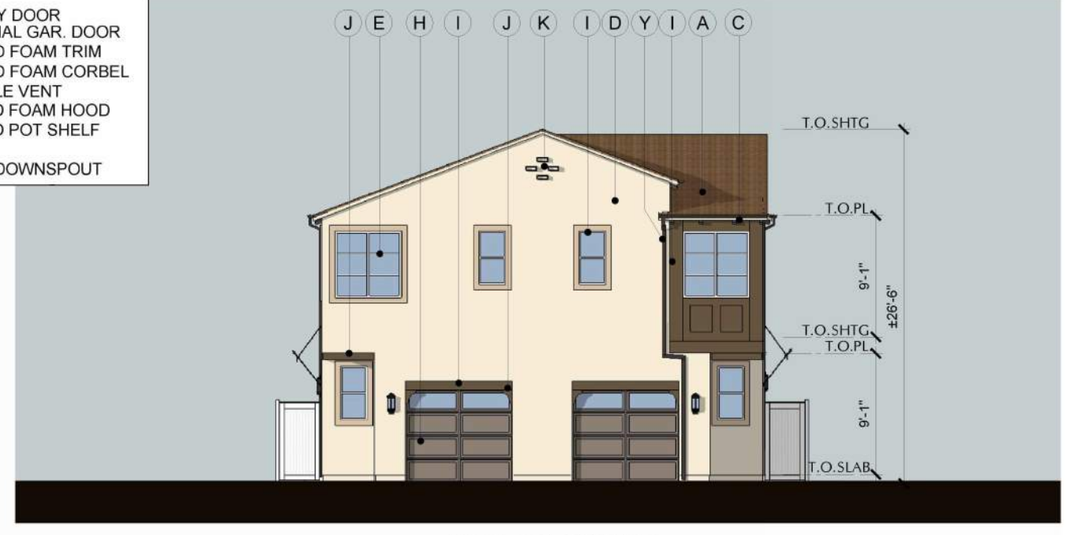
REAR ELEVATION

LEGEND

A - 'S' TILE CONCRETE ROOF
C - WOOD RAFTER TAILS
D - STUCCO
E - VINYL WINDOW
F - COMPOSITE ENTRY DOOR
H - PANELED SECTIONAL GAR. DOOR
I - STUCCO WRAPPED FOAM TRIM
J - STUCCO WRAPPED FOAM CORBEL
K - DECORATIVE GABLE VENT
L - STUCCO WRAPPED FOAM HOOD
M - STUCCO WRAPPED POT SHELF
O - METAL AWNING
Y- METAL GUTTER & DOWNSPOUT



LEFT ELEVATION



FRONT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 4

Not to Scale

Representative Building Elevation – Building 1



RIGHT ELEVATION



REAR ELEVATION

LEGEND

A -	'S' TILE CONCRETE ROOF
C -	WOOD RAFTER TAILS
D -	STUCCO
E -	VINYL WINDOW
F -	COMPOSITE ENTRY DOOR
G -	COMPOSITE SHUTTERS
H -	PANELED SECTIONAL GAR. DOOR
I -	STUCCO WRAPPED FOAM TRIM
J -	STUCCO WRAPPED FOAM CORBEL
K -	DECORATIVE GABLE VENT
L -	STUCCO WRAPPED FOAM HOOD
M -	STUCCO WRAPPED POT SHELF
Y-	METAL GUTTER & DOWNSPOUT



LEFT ELEVATION



FRONT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 5

Not to Scale

Representative Building Elevation – Building 2



RIGHT ELEVATION



REAR ELEVATION

LEGEND

A - 'S' TILE CONCRETE ROOF
C - WOOD RAFTER TAILS
D - STUCCO
E - VINYL WINDOW
F - COMPOSITE ENTRY DOOR
H - PANELED SECTIONAL GAR. DOOR
I - STUCCO WRAPPED FOAM TRIM
J - STUCCO WRAPPED FOAM CORBEL
K - DECORATIVE GABLE VENT
M - STUCCO WRAPPED POT SHELF
Y- METAL GUTTER & DOWNSPOUT



LEFT ELEVATION



FRONT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 6

Not to Scale

Representative Building Elevation – Building 3



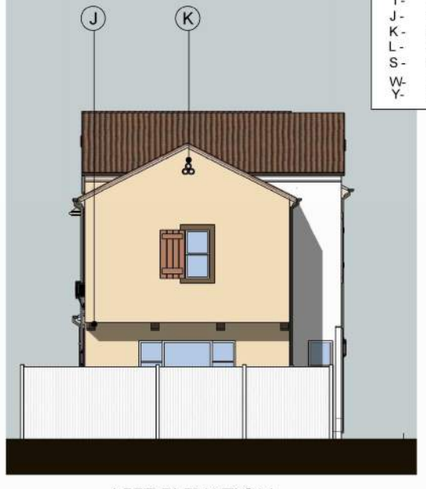
REAR ELEVATION



RIGHT ELEVATION

LEGEND

A - 'S' TILE CONCRETE ROOF
B - 7" FOAM EAVE
D - STUCCO
E - VINYL WINDOW
F - COMPOSITE ENTRY DOOR
G - COMPOSITE SHUTTERS
H - PANELED SECTIONAL GAR. DOOR
I - STUCCO WRAPPED FOAM TRIM
J - STUCCO WRAPPED FOAM CORBEL
K - DECORATIVE GABLE VENT
L - STUCCO WRAPPED FOAM HOOD
S - DECORATIVE STUCCO GRILL
W - METAL POT SHELF
Y - METAL GUTTER & DOWNSPOUT



LEFT ELEVATION



FRONT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 7

Not to Scale

Representative Building Elevation – Building 4



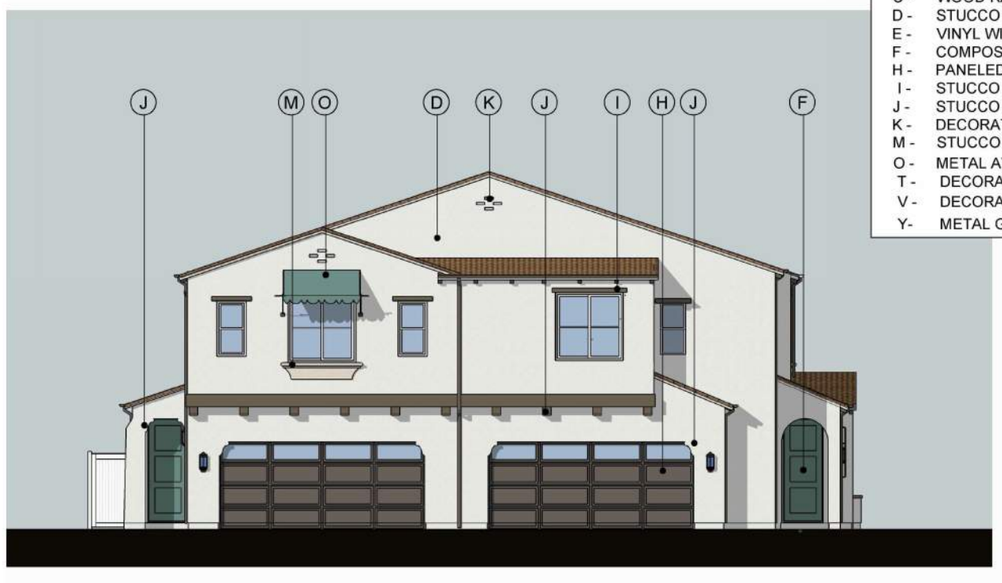
REAR ELEVATION



LEFT ELEVATION

LEGEND

A - 'S' TILE CONCRETE ROOF
C - WOOD RAFTER TAILS
D - STUCCO
E - VINYL WINDOW
F - COMPOSITE ENTRY DOOR
H - PANELED SECTIONAL GAR. DOOR
I - STUCCO WRAPPED FOAM TRIM
J - STUCCO WRAPPED FOAM CORBEL
K - DECORATIVE GABLE VENT
M - STUCCO WRAPPED POT SHELF
O - METAL AWNING
T - DECORATIVE CAP
V - DECORATIVE METAL GRILL
Y- METAL GUTTER & DOWNSPOUT



FRONT ELEVATION



RIGHT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 8

Not to Scale

Representative Building Elevation – Building 5



Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 9

Not to Scale

Conceptual Rendering – Gateway Drive

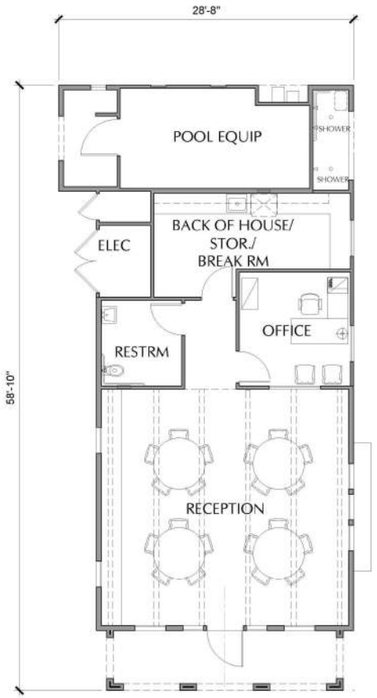


Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 10

Not to Scale

Conceptual Rendering – Canyon Park Drive

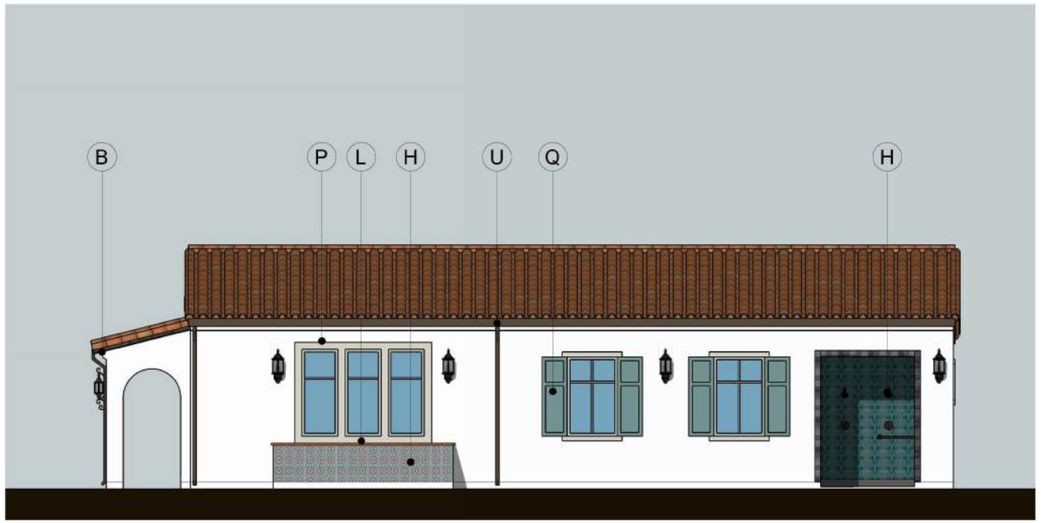


1,017 SF CONDITIONED + 291 SF UNCONDITIONED

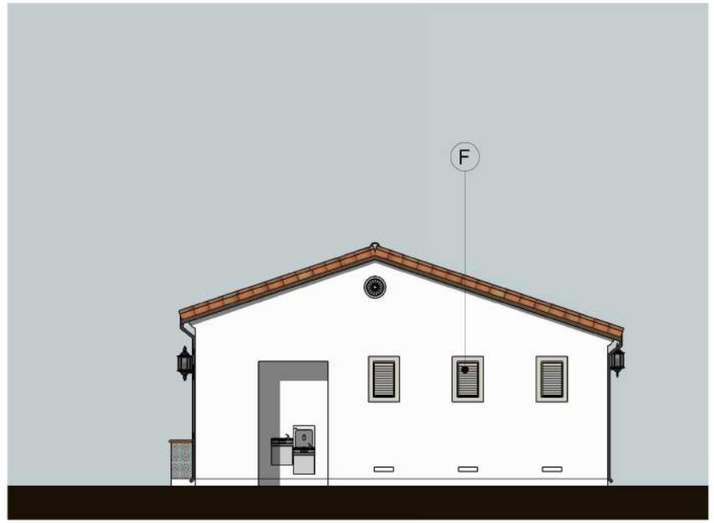
FLOOR PLAN

LEGEND

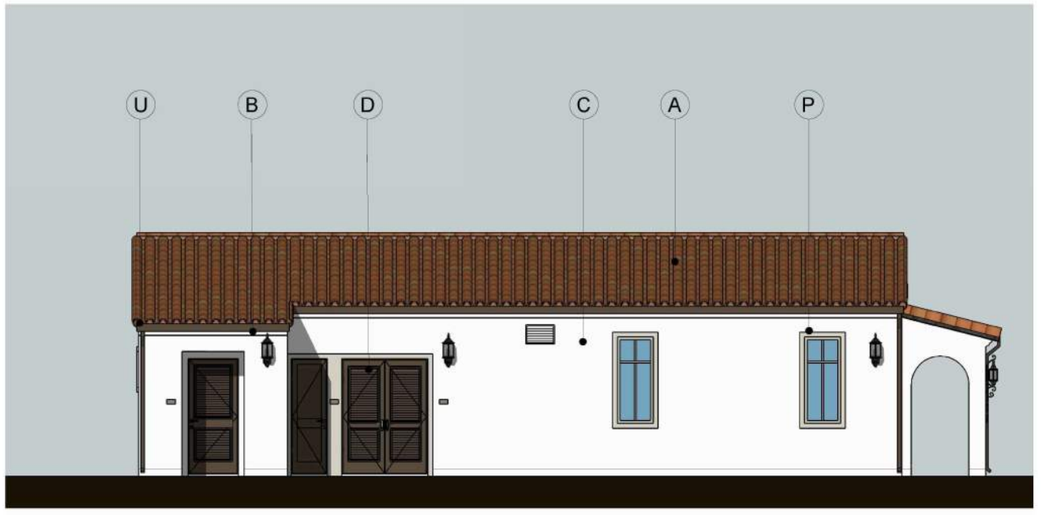
A -	'S' TILE CONCRETE ROOF
B -	12" FOAM EAVE
C -	STUCCO
D -	COMPOSITE LOUVER DOOR
E -	COMPOSITE ENTRY DOOR
F -	COMPOSITE LOUVER VENT
G -	DECORATIVE GABLE VENT
H -	CERAMIC TILE OR SIMILAR
L-	TERRA COTTA PAVER
P-	STUCCO WRAPPED FOAM TRIM
Q-	DECORATIVE SHUTTER
U-	METAL GUTTER & DOWNSPOUT



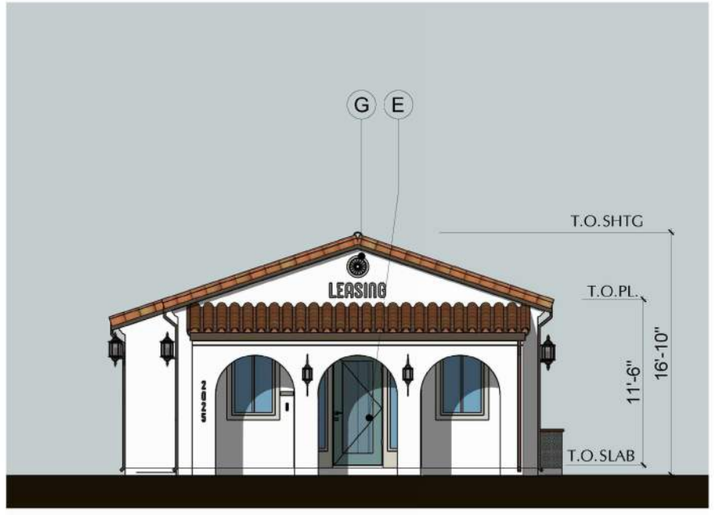
LEFT ELEVATION



REAR ELEVATION



RIGHT ELEVATION



FRONT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 11

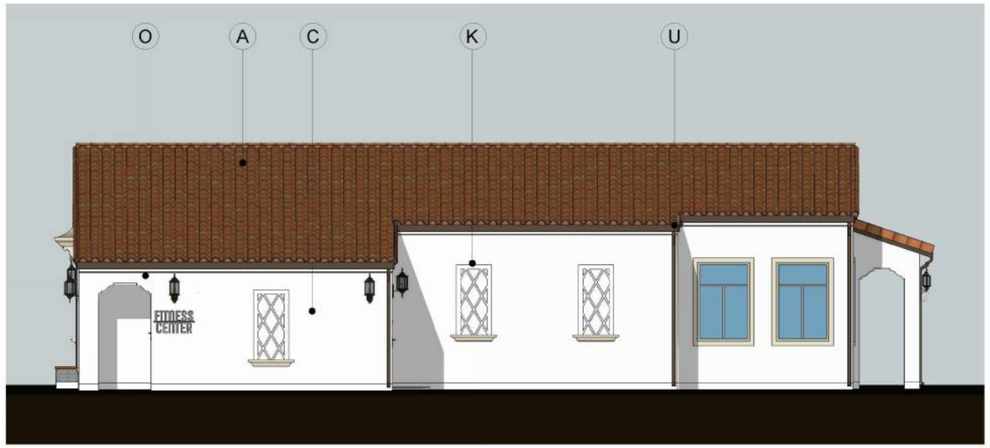
Not to Scale

Building Elevation – Leasing Office

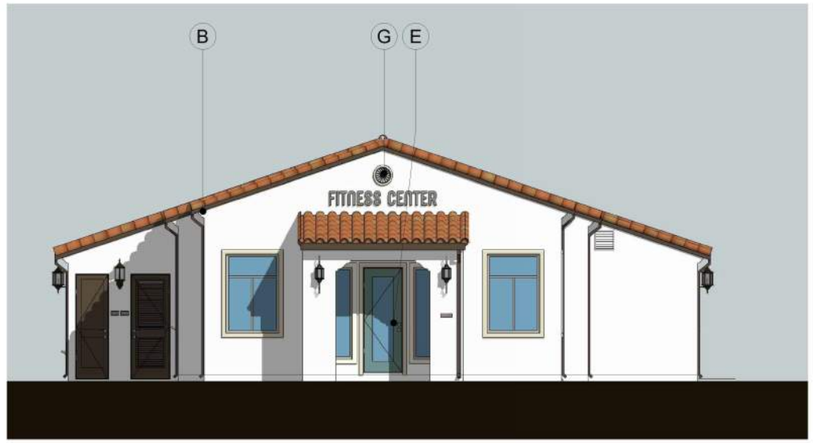


1,782 SF CONDITIONED + 313 SF RESTROOMS

FLOOR PLAN



LEFT ELEVATION



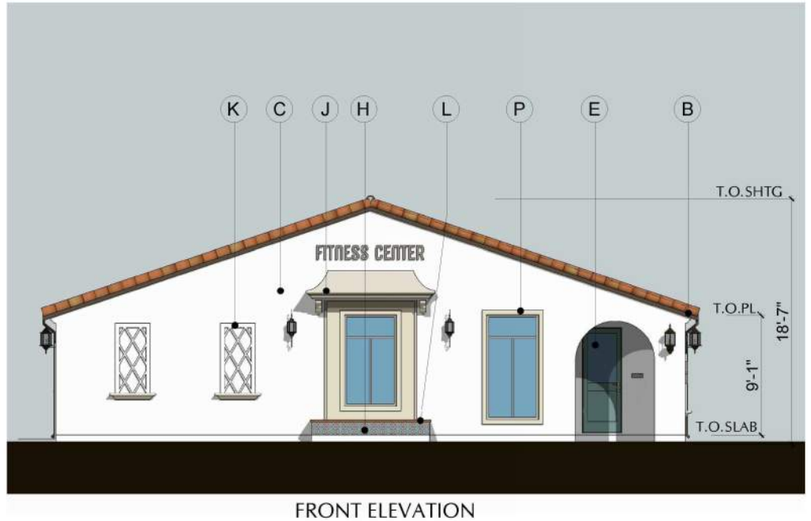
REAR ELEVATION

LEGEND

A - 'S' TILE CONCRETE ROOF
B - 12" FOAM EAVE
C - STUCCO
D - COMPOSITE LOUVER DOOR
E - COMPOSITE ENTRY DOOR
G - DECORATIVE GABLE VENT
H - CERAMIC TILE OR SIMILAR
J- STUCCO WRAPPED FOAM HOOD
K- DECORATIVE STUCCO GRILL
L- TERRA COTTA PAVER
O- STUCCO WRAPPED FOAM CORBEL
P- STUCCO WRAPPED FOAM TRIM
U- METAL GUTTER & DOWNSPOUT



RIGHT ELEVATION



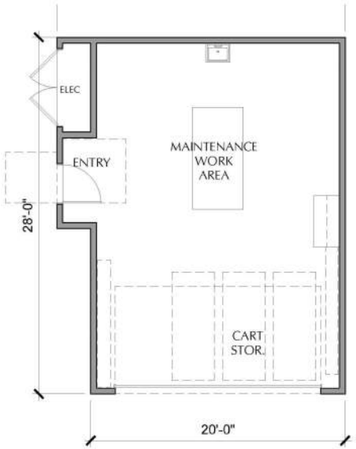
FRONT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 12

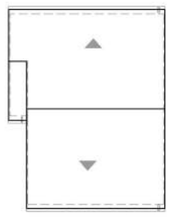
Not to Scale

Building Elevation – Fitness Building



600 SF

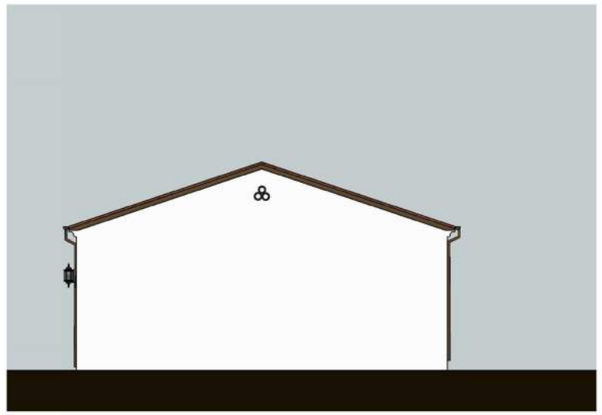
FLOOR PLAN



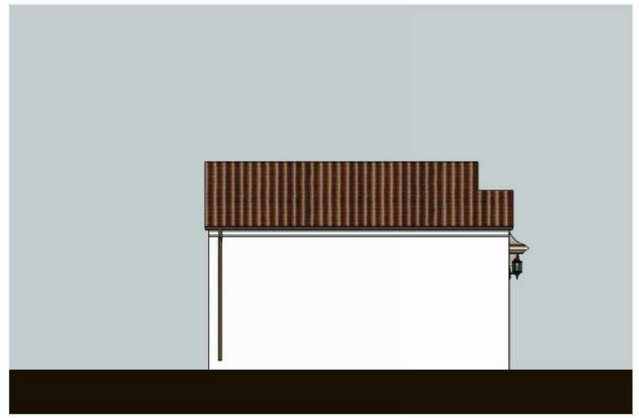
ROOF PLAN

LEGEND

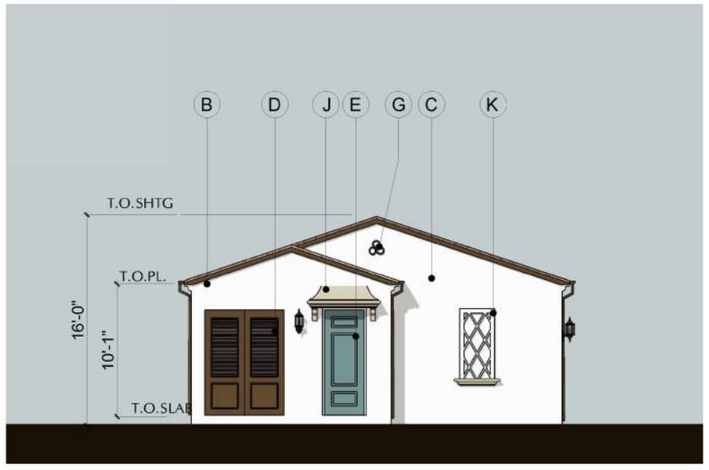
A -	'S' TILE CONCRETE ROOF
B -	12" FOAM EAVE
C -	STUCCO
D -	COMPOSITE LOUVER DOOR
E -	COMPOSITE ENTRY DOOR
G -	DECORATIVE GABLE VENT
I -	PANELED SECTIONAL GAR. DOOR
J-	STUCCO WRAPPED FOAM HOOD
K-	DECORATIVE STUCCO GRILL
O-	STUCCO WRAPPED FOAM CORBEL
U-	METAL GUTTER & DOWNSPOUT



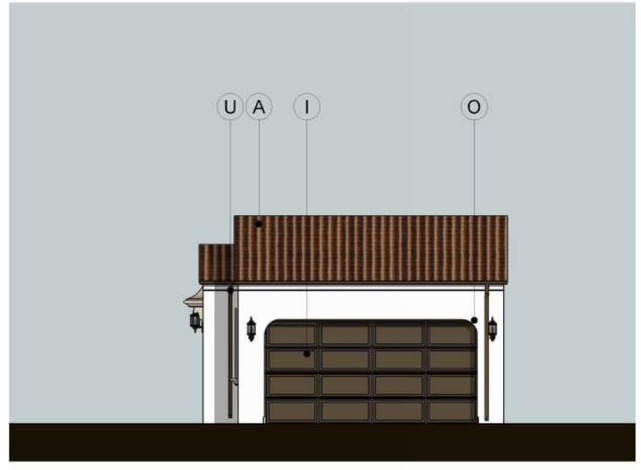
REAR ELEVATION



LEFT ELEVATION



FRONT ELEVATION



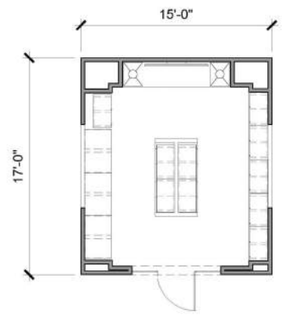
RIGHT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 13

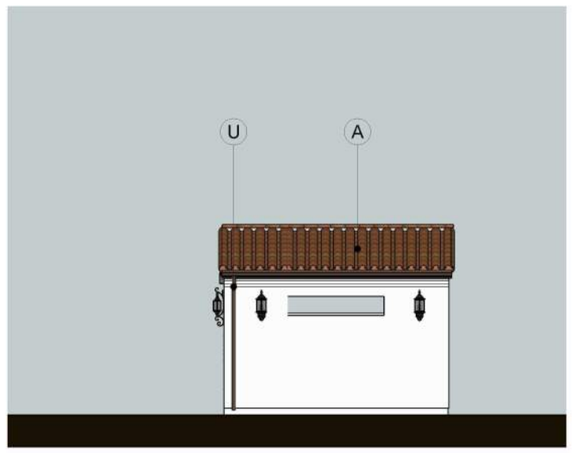
Not to Scale

Building Elevation – Maintenance Building

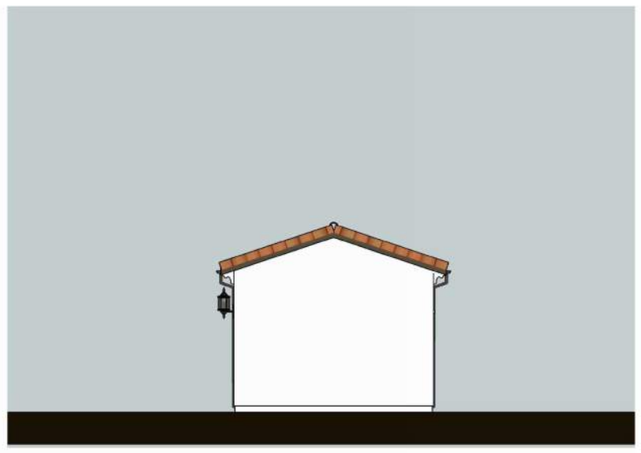


255 SF

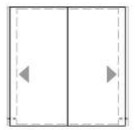
FLOOR PLAN



RIGHT ELEVATION



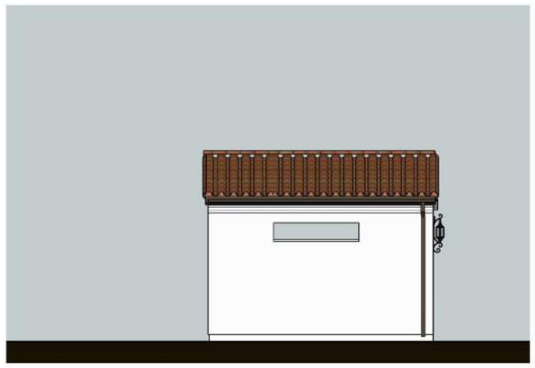
REAR ELEVATION



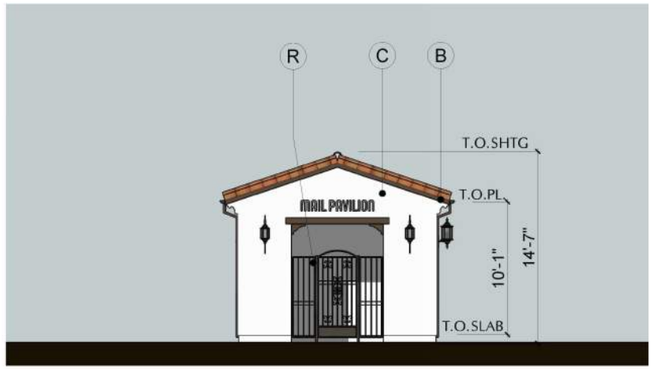
ROOF PLAN

LEGEND

A -	'S' TILE CONCRETE ROOF
B -	12" FOAM EAVE
C -	STUCCO
R-	METAL FENCING AND GATE
U-	METAL GUTTER & DOWNSPOUT



LEFT ELEVATION



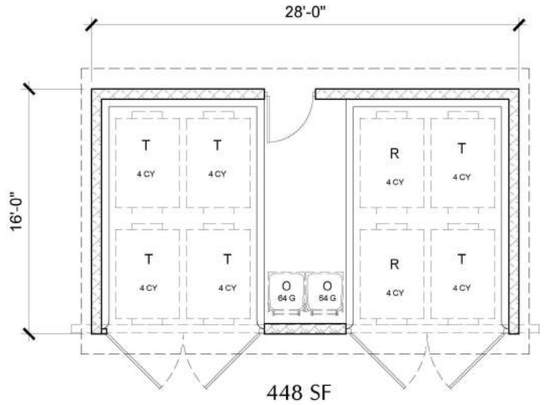
FRONT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 14

Not to Scale

Building Elevation – Mail Pavilion



448 SF

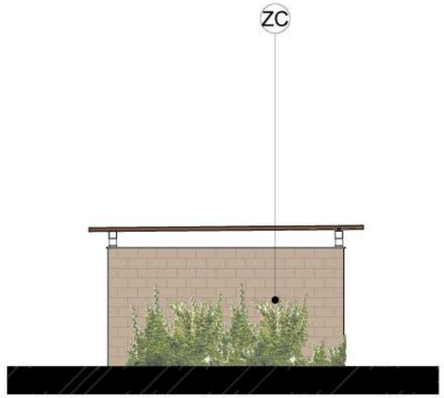
FLOOR PLAN



ROOF PLAN

LEGEND

R-	METAL FENCING AND GATE
X-	SPLIT-FACE CONCRETE BLOCK WALL
Y-	CORREGATED METAL ROOF
Z-	METAL BEAM
ZB-	DECOR. CONCRETE CAP
ZC-	VINES (SEE LANDSCAPE PLANS)



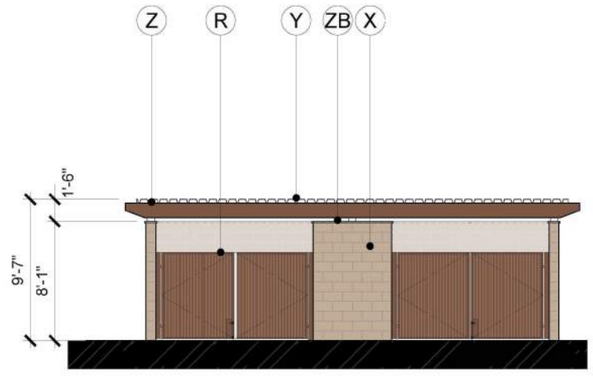
LEFT ELEVATION



RIGHT ELEVATION



REAR ELEVATION



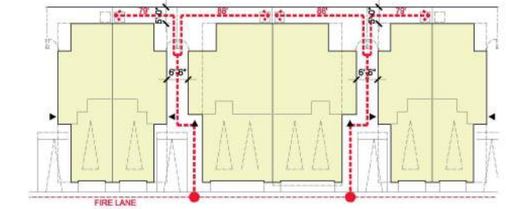
FRONT ELEVATION

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 15

Not to Scale

Building Elevation – Trash Enclosure



TYPICAL FIRE ACCESS TO DUPLEX REAR YARDS



BUILDING TYPE	CONSTRUCTION TYPE	NO. OF STORIES	OCCUPANCY	SPRINKLER
DUPLEXES	VB	2	R3/U	13D
LEASING	VB	1	B/S2	13
FITNESS	VB	1	B	13
MAINTENANCE	VB	1	U	NONE
MAIL	VB	1	U	NONE
TRASH	VB	1	U	NONE

LEGEND:

FIRE LANE CLEAR DIMENSION

FIRE LANE TURNING RADIUS
28'-0" INSIDE, 48'-0" OUTSIDE

FIRE HOSE PULL & LENGTH

FRONT DOOR LOCATION OF DUPLEXES

Source(s): Angeleno Associates, Inc. (01-26-2026)

Figure 16

Not to Scale

Fire/Emergency Vehicle/Trash Truck Access Plan



Source(s): Sitescapes (01-26-2026)

Figure 17

Not to Scale

Pedestrian Circulation Plan

LEGEND

1. MOTOR COURT MAIN ENTRY
   - (2) DECORATIVE SLIDING VEHICULAR GATES
   - CENTRAL ISLAND DIRECTORY
   - ENHANCED PAVING
2. RECREATION AREA
   - POOL
   - SPA
   - LARGE SUN DECK
   - CABANA SHADE STRUCTURE
3. ENTERTAINMENT COURTYARD
   - (2) BBQS
   - VARIETY OF SEATING OPPORTUNITIES
4. DECORATIVE UNIT PAVERS BANDS
   - DESIGNED TO PROMOTE SHARING OF STREET WITH PEDESTRIANS AND TO SLOW DOWN TRAFFIC, CREATING A MORE LIVABLE, INCLUSIVE, AND SAFER ENVIRONMENT. ALSO KNOWN AS A "WOONERF" IN EUROPE.
5. ENCLOSED DOG PARK
6. PEDESTRIAN WALKWAYS WITH MATCHING CROSSWALKS
7. SECONDARY ENTRY WITH DECORATIVE SLIDING GATE (EGRESS ONLY)
8. PRIVATE BACKYARDS (TYP.)
9. PRIVATE FRONT YARDS (TYP.)



TREE LEGEND

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	WUCOLS
	TREES			
	Arbutus 'Marina'	Strawberry Tree	24" Box	L
	Cercidium hybrid 'Desert Museum'	Hybrid Palo Verde	24" Box	L
	Lagerstroemia arapaho	Red Crape Myrtle	24" Box	M
	Lagerstroemia zuni	Dwarf Crape Myrtle	36" Box	M
	Ligustrum japonicum	Privet	15 G.	M
	Magnolia grandiflora 'Little Gem'	Southern Magnolia	24" Box	M
	Pyrus calleryana 'Chanticleer'	Chanticleer Pear	24" Box	M
	Olea europaea 'Swan Hill'	Swan Hill Olive	60" Box	L
	Podocarpus gracilior	Fern Pine	60" Box	M
	Ulmus parvifolia 'True Green'	Evergreen Elm	24" Box	M
	PALMS			
	Phoenix Dactylifera	Date Palm	20' B.T.H	L

SHRUB LEGEND

	Agave 'Blue Flame'	Blue Flame Agave	L
	Aloe arborescens	Torch Aloe	L
	Baccharis pilularis 'Pigeon Point'	Dwarf Coyote Brush	
	Bougainvillea 'Oh La La'	Bougainvillea	L
	Buxus microphylla japonica	Japanese Boxwood	M
	Callistemon viminalis 'LittleJohn'	Dwarf Bottlebrush	M
	Carex divulsa	Berkeley Sedge	
	Chondropetalum tectorum	Cape Rush	M
	Dianella revoluta 'DR5000'	Little Rev Flax Lily	M
	Dianella tasmanica 'Silver Streak'	Silver Streak Flax Lily	M
	Euonymus japonica 'Green Spire'	Evergreen Euonymus	M
	Grevillea 'Superb'	Superb Grevillea	
	Hemerocallis 'Dwarf Red'	Day Lily	M
	Lantana hybrids 'New Gold'	New Gold Lantana	L
	Leucophyllum candidum 'Thundercloud'	N.C.N.	L
	Ligustrum japonicum 'Texanum'	Wax Leaf Privet	M
	Moraea bicolor	Fortnight Lily	M
	Muhlenbergia capillaris 'Regal Mist'	Regal Mist Muhly	M
	Olea europaea 'Montra' P.P.#6266	Little Ollie Dwarf Olive	L
	Pennisetum 'Fairy Tails'	Fairy Tails Fountain Grass	
	Pittosporum tobira 'Wheeleri'	Wheeler's Dwarf Tobira	M
	Podocarpus elongatus 'Monmal'	Icee Blue Yellow-Wood	M
	Rhaphiolepis indica 'Clara'	Dwarf Indian Hawthorne	M
	Rosa f. 'Trumpeter'	Trumpeter Rose	M
	Senecio ficoides 'Mount Everest'	Skyscraper Senecio	
	Strelitzia reginae	Bird-of-Paradise	M
	Tecoma stans 'Sierra Apricot'	Sierra Apricot	M
	Westringia fruticosa 'Morning Light'	Coast Rosemary	L
	Yucca recurvifolia	Pendulous Yucca	L
▲	Ficus pumila (repens) (At trash enclosure)	Creeping Fig	M

Source(s): Sitescapes (01-26-2026)

Figure 18

Not to Scale

Preliminary Landscape Plan



Source(s): Sitescapes (01-26-2026)

Figure 19

Not to Scale

Open Space Plan

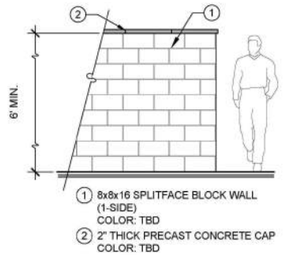


Source(s): Sitescapes (01-26-2026)

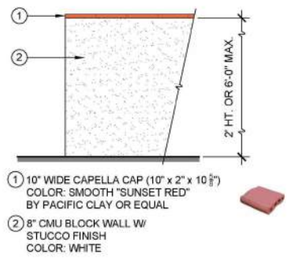
Figure 20a

Not to Scale

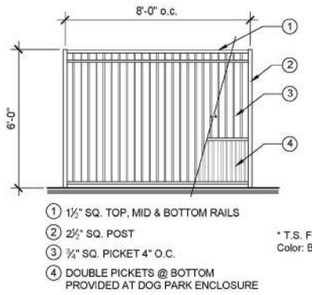
Fence and Wall Plan



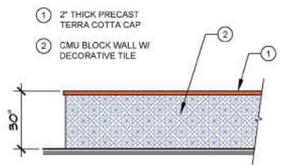
SPLIT FACE BLOCK WALL



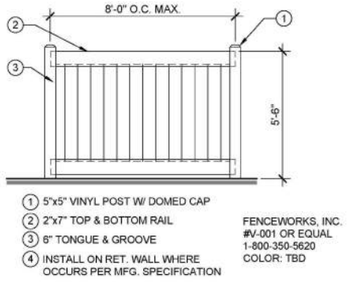
THEME WALL (FREE STANDING)



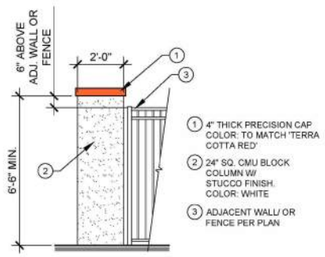
TUBULAR STEEL FENCE



LOW DECORATIVE TILE WALL



VINYL PRIVACY FENCE

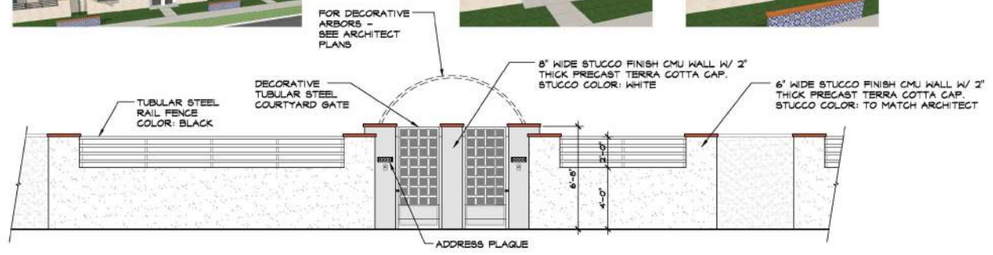


24" SQ. STUCCO PILASTER

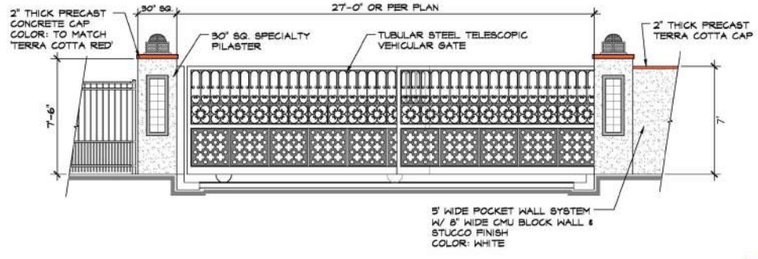




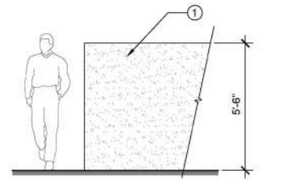




COURTYARD COMBO WALL - ELEVATION



VEHICULAR ENTRY GATE - ELEVATION



5'-6" STUCCO WALL

Source(s): Sitescapes (01-26-2026)

Figure 20b

Not to Scale

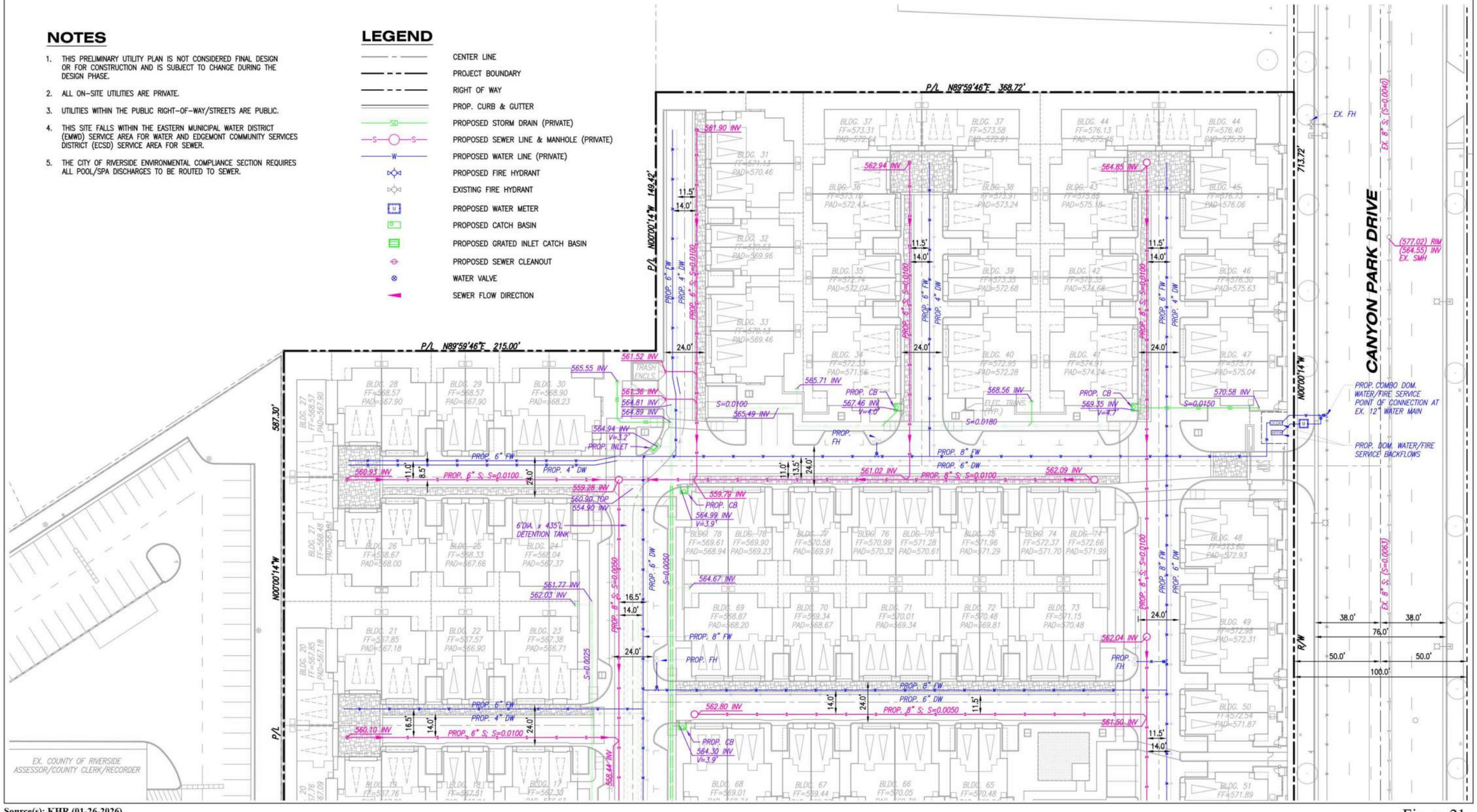
Fence and Wall Plan

NOTES

1. THIS PRELIMINARY UTILITY PLAN IS NOT CONSIDERED FINAL DESIGN OR FOR CONSTRUCTION AND IS SUBJECT TO CHANGE DURING THE DESIGN PHASE.
2. ALL ON-SITE UTILITIES ARE PRIVATE.
3. UTILITIES WITHIN THE PUBLIC RIGHT-OF-WAY/STREETS ARE PUBLIC.
4. THIS SITE FALLS WITHIN THE EASTERN MUNICIPAL WATER DISTRICT (EMWD) SERVICE AREA FOR WATER AND EDGEMONT COMMUNITY SERVICES DISTRICT (ECSD) SERVICE AREA FOR SEWER.
5. THE CITY OF RIVERSIDE ENVIRONMENTAL COMPLIANCE SECTION REQUIRES ALL POOL/SPA DISCHARGES TO BE ROUTED TO SEWER.

LEGEND

- CENTER LINE
- PROJECT BOUNDARY
- RIGHT OF WAY
- PROP. CURB & GUTTER
- PROPOSED STORM DRAIN (PRIVATE)
- PROPOSED SEWER LINE & MANHOLE (PRIVATE)
- PROPOSED WATER LINE (PRIVATE)
- PROPOSED FIRE HYDRANT
- EXISTING FIRE HYDRANT
- PROPOSED WATER METER
- PROPOSED CATCH BASIN
- PROPOSED GRATED INLET CATCH BASIN
- PROPOSED SEWER CLEANOUT
- WATER VALVE
- SEWER FLOW DIRECTION

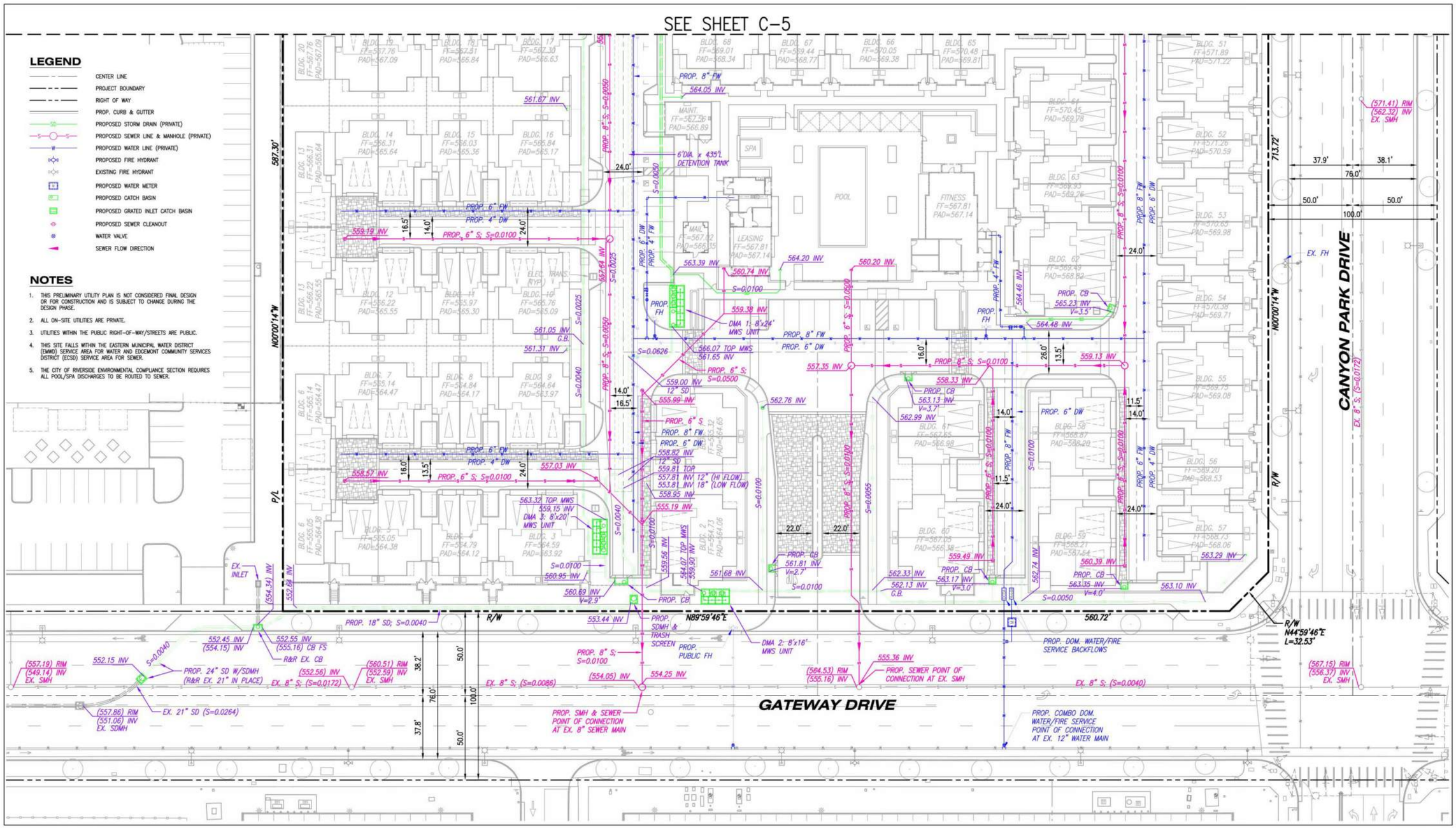


Source(s): KHR (01-26-2026)

Figure 21a

Not to Scale

Conceptual Wet Utility Plan

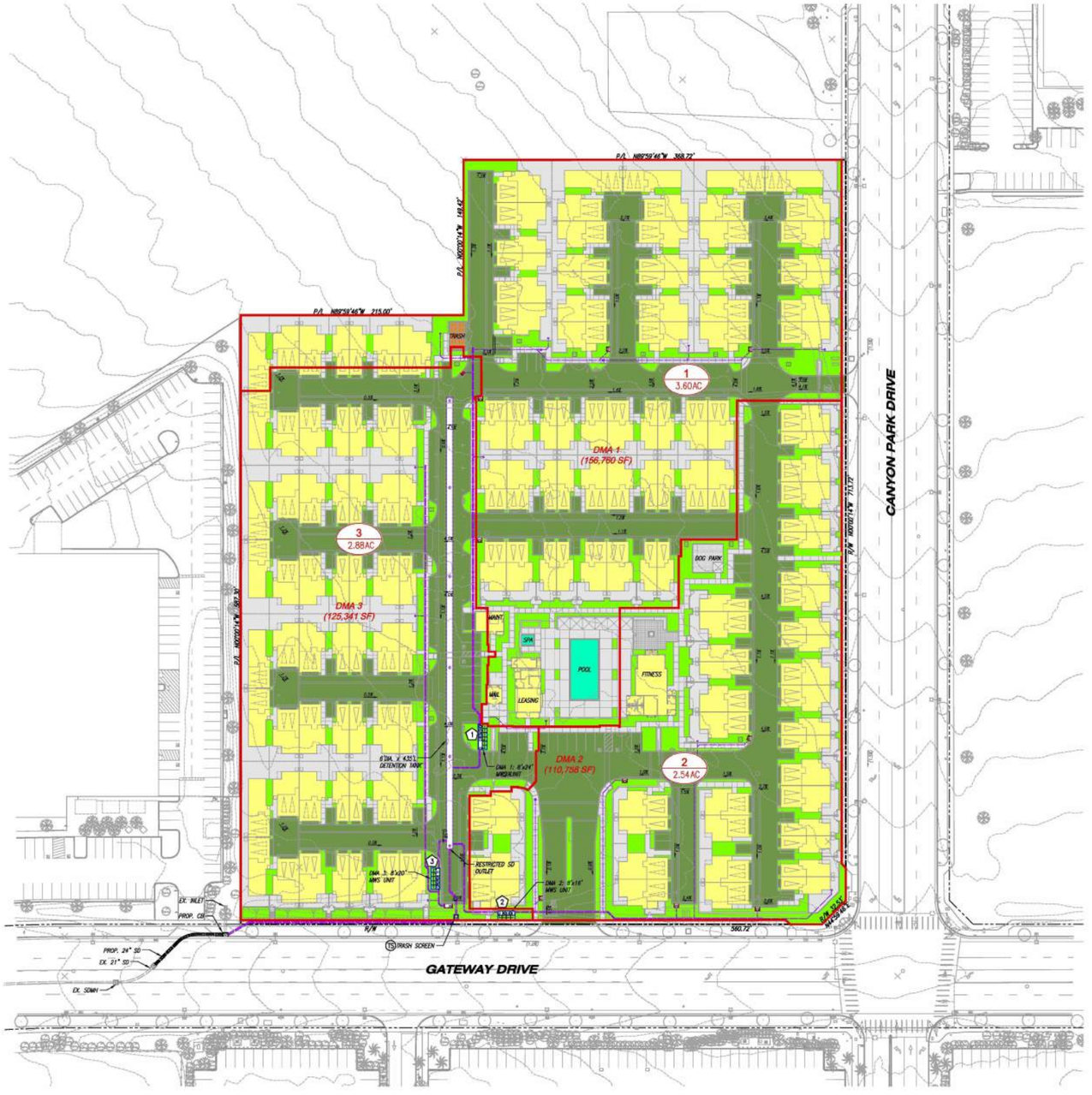


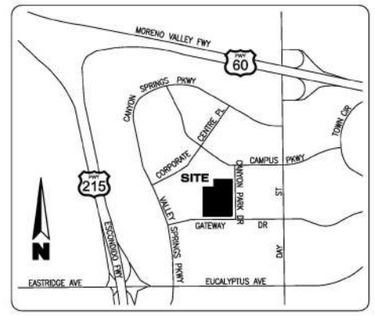
Source(s): KHR (01-26-2026)

Figure 21b

Not to Scale

Conceptual Wet Utility Plan





VICINITY MAP

NOT TO SCALE

OWNER

LS BTR DEVELOPMENT, LLC
1156 N. MOUNTAIN AVENUE,
UPLAND, CALIFORNIA 91786
ATTN.: BRIAN ORTWEIN
PHONE NO.: (909) 579-5155

APN

291-440-003, 291-440-005, 291-440-006, AND 291-440-007

MEASURED INFILTRATION RATES

P-1: 0.40 IN./HR. P-2: 0.30 IN./HR.
P-3: 0.20 IN./HR. P-4: 0.10 IN./HR.

SITE INFORMATION

TOTAL PROPERTY AREA:	397,648 SF (9.13 AC) 100%
PROPOSED IMPERVIOUS AREA & %:	349,572 SF (8.03 AC) 88%
PROPOSED PERVIOUS AREA & %:	48,076 SF (1.10 AC) 12%
TOTAL DESIGN CAPTURE VOLUME (DCV):	11,706 CF
TOTAL SWQDF:	1.0 CFS
TOTAL DISTURBED AREA:	393,142 SF (9.03 AC) 99%
UNDISTURBED AREA (RIGHT-OF-WAY SIDEWALK):	4,506 SF (0.10 AC)

LEGEND

DESCRIPTION	SYMBOL	DMA NAME
SD-12 & SC-41: PERMEABLE AREA (LANDSCAPE AREA)		#A
SC-41: IMPERMEABLE ROOF SURFACES		#B
SD-32 & SC-34: TRASH ENCLOSURE		#B
SC-41: IMPERMEABLE HARDSCAPE AREA		#C
POOL/WATER FEATURE		#C
SC-43: IMPERMEABLE VEHICULAR SURFACE		#D
SC-44: PROPOSED PRIVATE STORM DRAIN		
PROPOSED STORM DRAIN JUNCTION STRUCTURE		
PROPOSED MODULAR WETLANDS SYSTEM		
SD-13 & SC-44: PROPOSED DROP INLET/CATCH BASIN WITH STENCILING		
LID BMP IDENTIFIER	f	
TRASH SCREEN	TS	
LID BMP DRAINAGE AREA BOUNDARY		
DMA # DMA AREA	# #.##AC	

*DMA NAME USES LID BMP IDENTIFIER OF THE SPECIFIC BMP DRAINAGE AREA WITH THE LETTER CORRESPONDING TO THE SURFACE TYPE.

Source(s): KHR (01-12-2026)

Figure 22

Not to Scale

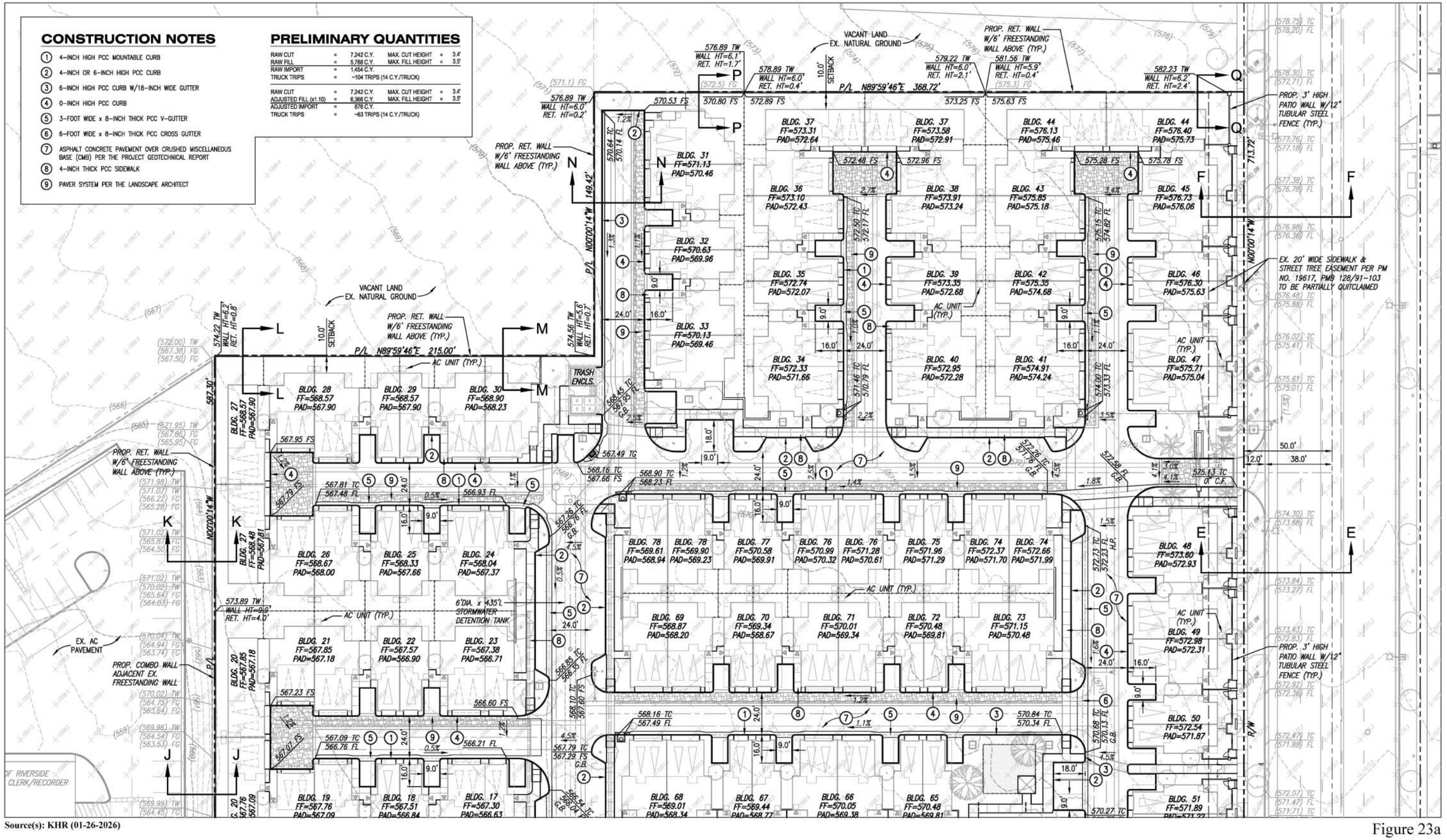
Preliminary WQMP Site Plan

CONSTRUCTION NOTES

1. 4-INCH HIGH PCC MOUNTABLE CURB
2. 4-INCH OR 6-INCH HIGH PCC CURB
3. 6-INCH HIGH PCC CURB W/18-INCH WIDE GUTTER
4. 0-INCH HIGH PCC CURB
5. 3-FOOT WIDE x 8-INCH THICK PCC V-GUTTER
6. 6-FOOT WIDE x 8-INCH THICK PCC CROSS GUTTER
7. ASPHALT CONCRETE PAVEMENT OVER CRUSHED MISCELLANEOUS BASE (CMB) PER THE PROJECT GEOTECHNICAL REPORT
8. 4-INCH THICK PCC SIDEWALK
9. PAVER SYSTEM PER THE LANDSCAPE ARCHITECT

PRELIMINARY QUANTITIES

RAW CUT	=	7,242 C.Y.	MAX. CUT HEIGHT	=	3.4'
RAW FILL	=	5,788 C.Y.	MAX. FILL HEIGHT	=	3.5'
RAW IMPORT	=	1,454 C.Y.			
TRUCK TRIPS	=	~104 TRIPS (14 C.Y./TRUCK)			
RAW CUT	=	7,242 C.Y.	MAX. CUT HEIGHT	=	3.4'
ADJUSTED FILL (x1.10)	=	6,366 C.Y.	MAX. FILL HEIGHT	=	3.5'
ADJUSTED IMPORT	=	876 C.Y.			
TRUCK TRIPS	=	~63 TRIPS (14 C.Y./TRUCK)			

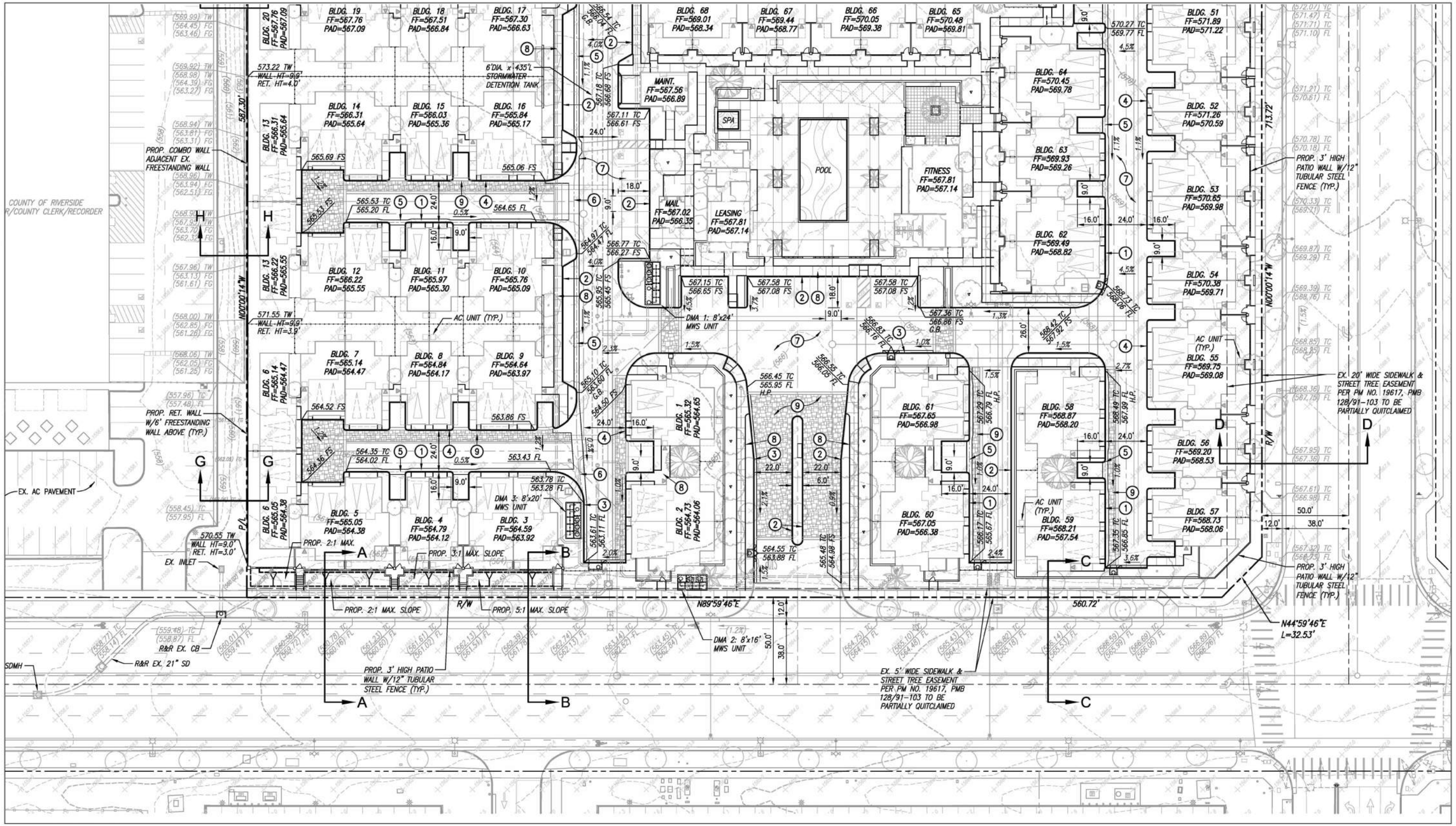


Source(s): KHR (01-26-2026)

Figure 23a

Not to Scale

Preliminary Grading Plan

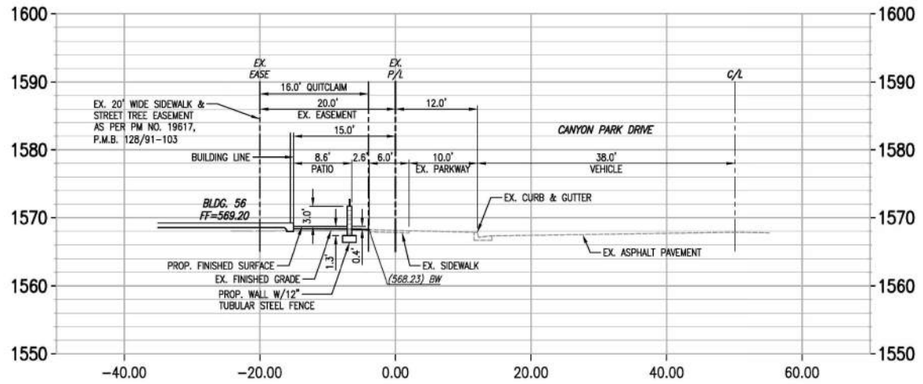


Source(s): KHR (01-26-2026)

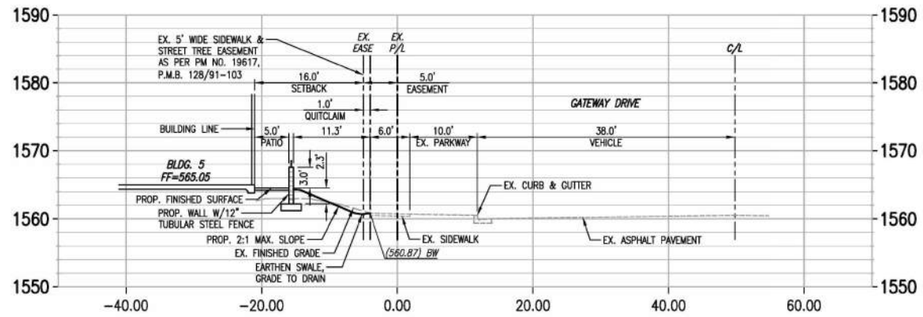
Figure 23b

Not to Scale

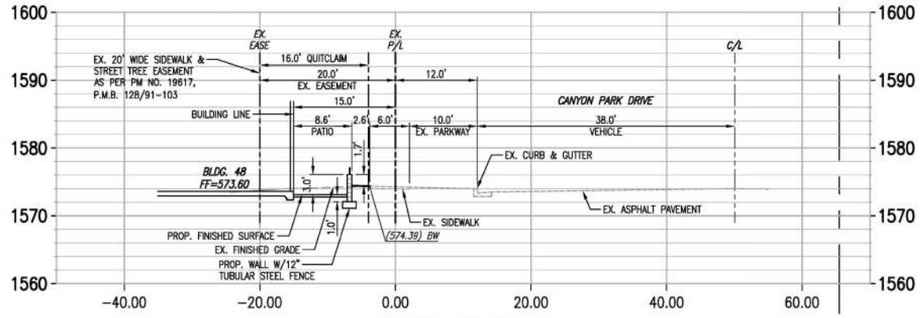
Preliminary Grading Plan



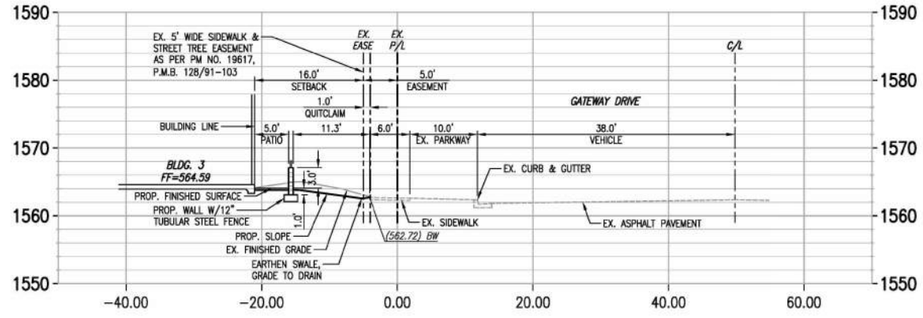
SECTION "D"-"D"
SCALE: 1"=10'; SEE SHEET C-2



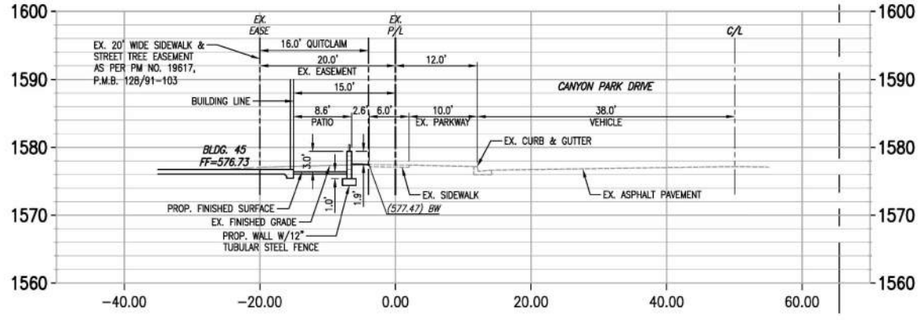
SECTION "A"-"A"
SCALE: 1"=10'; SEE SHEET C-2



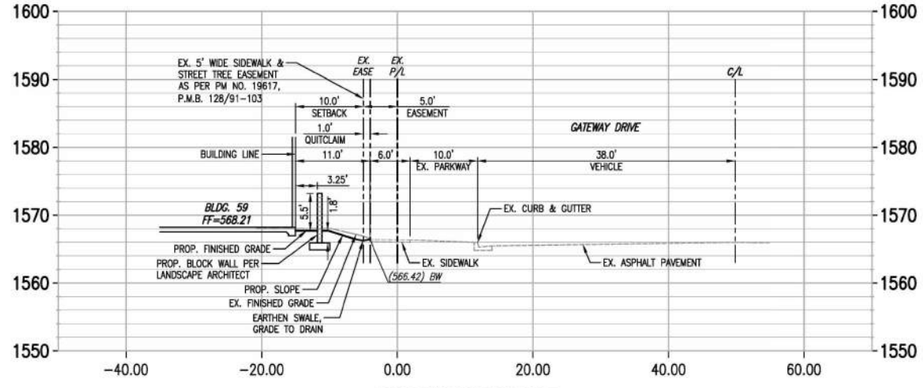
SECTION "E"-"E"
SCALE: 1"=10'; SEE SHEET C-1



SECTION "B"-"B"
SCALE: 1"=10'; SEE SHEET C-2



SECTION "F"-"F"
SCALE: 1"=10'; SEE SHEET C-1

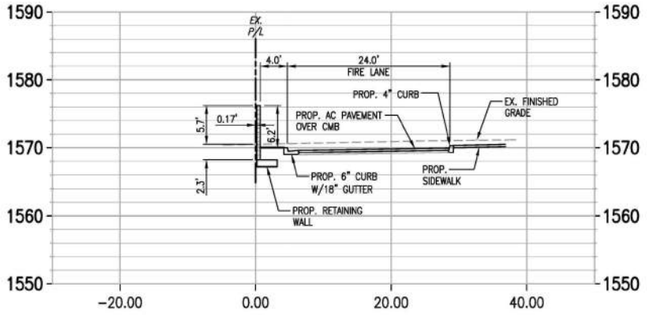


SECTION "C"-"C"
SCALE: 1"=10'; SEE SHEET C-2

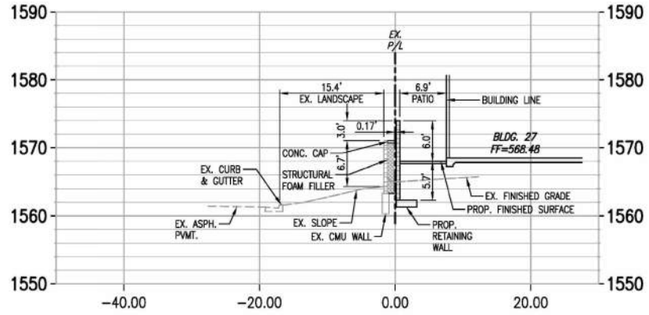
Source(s): KHR (01-26-2026)

Figure 23c

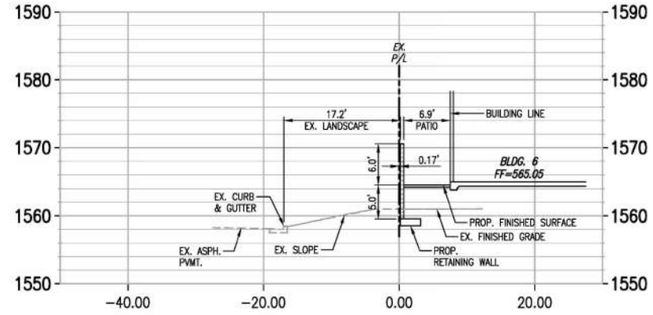
Not to Scale



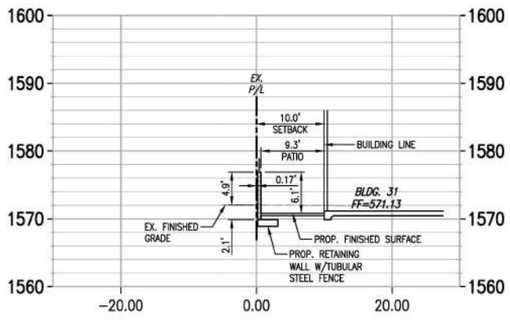
SECTION "N"-"N"
SCALE: 1"=10'; SEE SHEET C-1



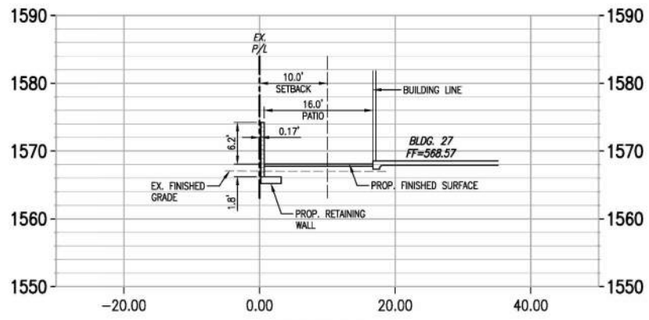
SECTION "K"-"K"
SCALE: 1"=10'; SEE SHEET C-1



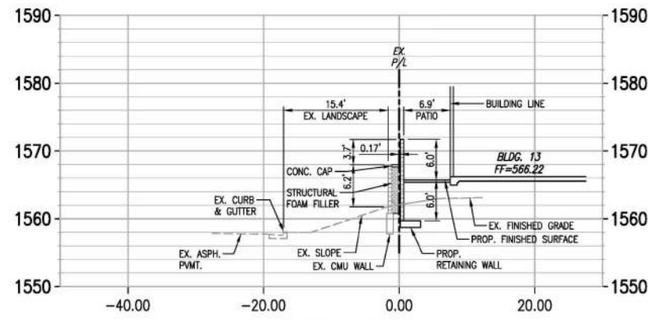
SECTION "G"-"G"
SCALE: 1"=10'; SEE SHEET C-2



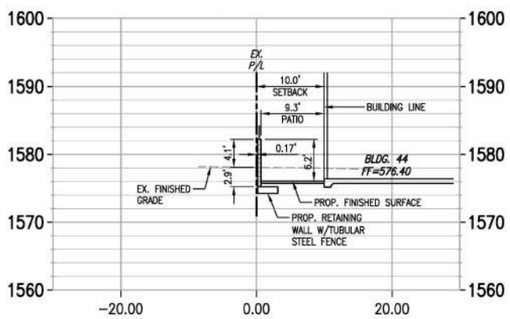
SECTION "P"-"P"
SCALE: 1"=10'; SEE SHEET C-1



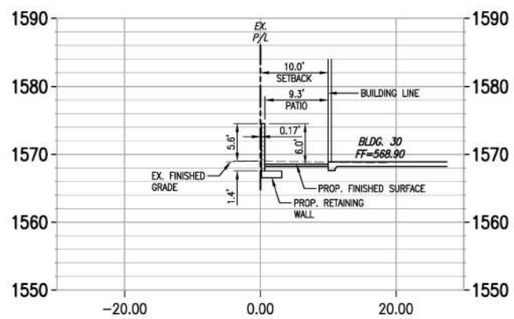
SECTION "L"-"L"
SCALE: 1"=10'; SEE SHEET C-1



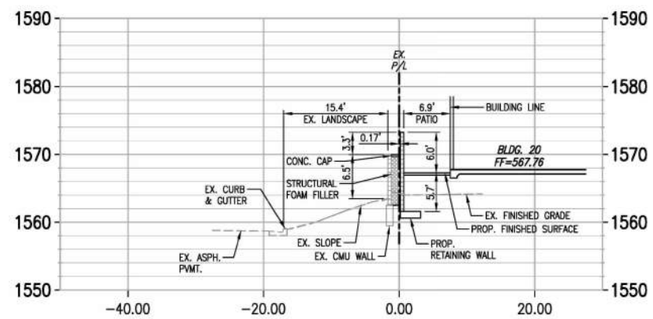
SECTION "H"-"H"
SCALE: 1"=10'; SEE SHEET C-2



SECTION "Q"-"Q"
SCALE: 1"=10'; SEE SHEET C-1



SECTION "M"-"M"
SCALE: 1"=10'; SEE SHEET C-1



SECTION "J"-"J"
SCALE: 1"=10'; SEE SHEET C-1

Source(s): KHR (01-26-2026)

Figure 23d

Not to Scale

EXISTING



PROPOSED



Legend

- Canyon Springs Business Park Specific Plan
- Planning Areas
- Canyon Springs Healthcare Campus Specific Plan (CSHCSP)
- Mixed Use - Urban (MU-U)
- Commercial Retail (C)
- Business/Office Park (B/OP)

Source(s): CSBPSP Specific Plan (11-14-2017), Dudek (11-13-2025)

Figure 24

Not to Scale

Existing and Proposed Land Use Designation

EXISTING



PROPOSED



Legend

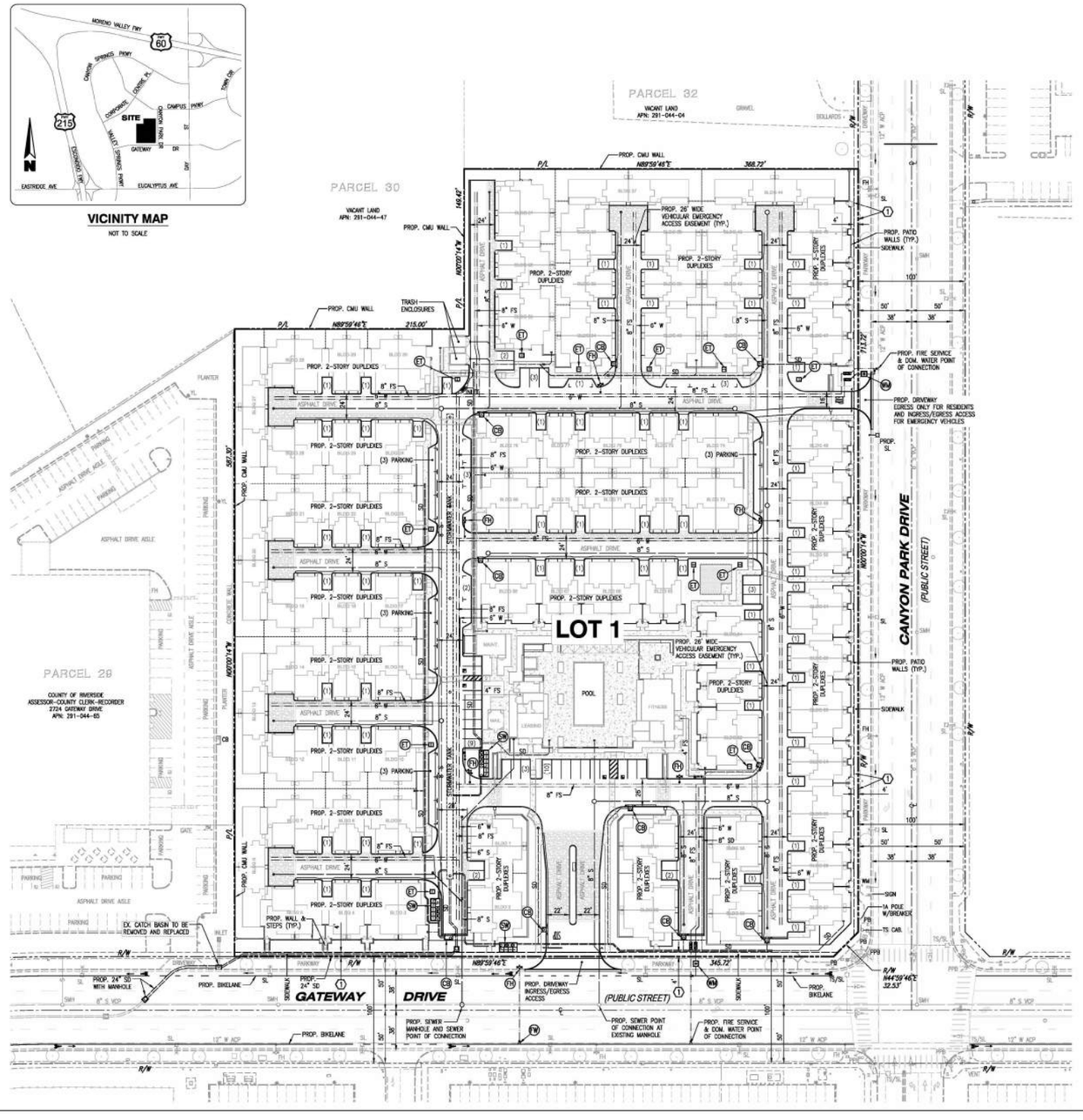
- Canyon Springs Business Park Specific Plan
- Planning Areas
- Canyon Springs Healthcare Campus Specific Plan (CSHCSP)
- Business and Manufacturing Park (BMP)
- Commercial Retail (CR-SP)
- Office (O-SP)
- Mixed Use - Urban (MU-U-SP)
- Public Facilities (PF-SP)

Source(s): CSBPSP Specific Plan (11-14-2017), Dudek (11-13-2025)

Figure 25

Not to Scale

Existing and Proposed Zoning



TENTATIVE TRACT MAP NO. 39251

FOR CONDOMINIUM PURPOSES

IN THE CITY OF RIVERSIDE, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA
JANUARY 19, 2026

PROPOSED SITE PLAN

AREA

TOTAL AREA = 397,848 S.F. (9.128 ACRES)

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF RIVERSIDE IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCELS 31, 33, 34, AND 35 OF PARCEL MAP 19817, IN THE CITY OF RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN ON MAP RECORDED IN PARCEL MAP BOOK 128, PAGES 91 THROUGH 103, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

APN: 291-440-003, 291-440-005, 291-440-006, AND 291-440-007

EASEMENTS

(1) AMENDED EASEMENT(S) FOR SIDEWALK AND STREET TREE PURPOSES AND RIGHTS INCIDENTAL PER QUITCLAIM DEED TO BE RECORDED PER SEPARATE INSTRUMENT.

- PROPOSED 4' WIDE ALONG CANYON PARK DRIVE.
- PROPOSED 4' WIDE ALONG GATEWAY DRIVE.

NOTES

1. EXISTING NUMBER OF LOTS: 4 PROPOSED LOTS: 1
2. REMOVAL OR RELOCATION OF EXISTING UTILITIES TO BE COORDINATED WITH UTILITY COMPANIES, CITY OF RIVERSIDE, AND THE COUNTY OF RIVERSIDE.
3. THERE ARE NO PROPOSED PUBLIC STREETS AS A PART OF THIS DEVELOPMENT/SUBDIVISION.
4. DATE OF SURVEY: JULY 29, 2024
5. PROPOSED PARTIAL QUITCLAIM OF EXISTING EASEMENT(S).

ABBREVIATIONS

ACP	ASBESTOS CEMENT PIPE
BFD	BACKFLOW DEVICE
℄	CENTERLINE (STREET)
CAB.	CABINET (UTILITY)
CB	CATCH BASIN
DCDA	DOUBLE CHECK DETECTOR ASSEMBLY
FH	FIRE HYDRANT
INT.	INTERSECTION
IRR.	IRRIGATION
P/L	PROPERTY LINE
(#)	NUMBER OF PARKING STALLS
PB	PULL BOX
PPB	PEDESTRIAN PUSH BUTTON
RPPA	REDUCED PRESSURE PRINCIPLE ASSEMBLY
R/W	RIGHT OF WAY
S	SEWER
SD	STORM DRAIN
SL	STREET LIGHT
SMH	SEWER MANHOLE
TS	TRAFFIC SIGNAL
VCP	VITRIFIED CLAY PIPE
VENT	ELECTRICAL VENT RISER
W	WATER
WM	WATER METER

OWNER / SUBDIVIDER

I.S. BTR DEVELOPMENT, LLC
A DELAWARE LIMITED LIABILITY COMPANY
1156 N. MOUNTAIN AVENUE,
UPLAND, CALIFORNIA 91786
ATTN: SPENCER BOGNER
(909) 985-0971

ENGINEER

KHR ASSOCIATES
17530 VON KARMAN AVENUE, SUITE 200
IRVINE, CALIFORNIA 92614
ATTN: JAMES KANAMURA
(949) 756-6440

REGISTERED PROFESSIONAL ENGINEER JAMES H. KANAMURA No. 30560 Expiration 03/31/26 CIVIL STATE OF CALIFORNIA

JAMES H. KANAMURA R.C.E. 30560

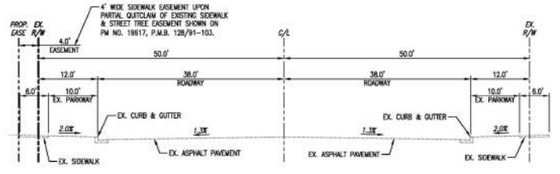
LEGEND

- BOUNDARY
- RIGHT OF WAY
- CENTERLINE
- EASEMENT
- SEWER LINE
- STORM DRAIN LINE
- WATER LINE
- CONTOUR
- CURB & GUTTER
- FIRE HYDRANT
- SD FLOW
- STREET LIGHT
- (CB) PROPOSED CATCH BASIN
- (DW) DOMESTIC WATER POINT OF CONNECTION
- (ET) PROPOSED ELECTRICAL TRANSFORMER
- (FH) PROPOSED FIRE HYDRANT
- (FW) PROPOSED FIRE HYDRANT WATER POINT OF CONNECTION
- (SW) PROPOSED STORMWATER TREATMENT DEVICE
- (WM) PROPOSED WATER METER

BENCHMARK

GPS-66 ELEVATION: 1506.754

2 1/2" BRASS DISK STAMPED "CITY OF RIVERSIDE GPS STATION 66 1991 CADMC" SET IN THE TOP OF A CATCH BASIN ALONG THE NORTHERLY SIDE OF CANYON SPRINGS PARKWAY 0.3 MILES WEST OF DAY STREET.



CANYON PARK DRIVE
SCALE: 1"=10'



GATEWAY DRIVE
SCALE: 1"=10'

Source(s): KHR (01-12-2026)

Figure 26

Not to Scale

Proposed TTM No. 39251

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

☐ Aesthetics	☐ Agriculture & Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

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

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

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

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

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

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

Signature _____ Date _____

Printed Name & Title Candice Assadzadeh, Senior Planner For City of Riverside

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a. **Earlier Analysis Used.** Identify and state where they are available for review.

   b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c. **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

a. the significance criteria or threshold, if any, used to evaluate each question; and

b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

1a. Response: ***(Source: General Plan 2025 Open Space and Conservation Element*** (City of Riverside, 2007a)***; and General Plan 2025 FPEIR Section 5.1, Aesthetics*** (City of Riverside, 2007b)***)***

Less Than Significant Impact. The City's General Plan 2025 Open Space and Conservation Element identifies the hills and ridgelines that surround the City as scenic vistas. The most notable scenic vistas in the City include the La Sierra/Norco Hills, located approximately 12.7 miles west of the Project site; Sycamore Canyon Wilderness Park, located approximately 1.7 miles west of the Project site; and Box Springs Mountain Regional Park, located approximately 1.4 miles north of the Project site. There are no scenic vistas identified near the Project site. However, there are distant views of the Box Springs Mountains for motorists and individuals traveling north along Canyon Park Drive east of the Project site.

The proposed Project consists of residential development within an urbanized area and would introduce buildings up to two stories on the currently undeveloped site. However, northerly views of the Box Spring Mountains would still be available from Canyon Park Drive. The Project does not involve any development that would alter the local hillsides, and views of these hillsides from various public vantage points in the City would remain available. Additionally, building heights under the proposed Project are consistent with or lower than those of the surrounding buildings.

Therefore, the proposed Project would not have a substantial adverse effect on a scenic vista. Impacts would be **less than significant** directly, indirectly, and cumulatively.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

1b. Response: ***(Source: Caltrans California State Scenic Highway System Map*** (Caltrans, 2025)***; General Plan 2025 Circulation and Community Mobility Element Figure CCM-4 – Master Plan of Roadways*** (City of Riverside, 2007a)***; and General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways*** (City of Riverside, 2007b)***)***

No Impact. The Project site is not located within or adjacent to an officially designated State scenic highway corridor and does not contain scenic resources, such as trees of scenic value, rock outcroppings, or historic buildings. The closest officially designated State scenic highway is a portion of State Route 74 (SR 74) located approximately 31.2 miles southeast of the Project site. The closest State-eligible scenic highway is a portion of SR 74 located approximately 10.8 miles south of the Project site. Therefore, the proposed Project would not substantially damage scenic resources within a State scenic highway. In addition, the General Plan 2025 designates several roadways as Scenic Boulevards and Parkways in order to protect scenic resources and enhance the visual character of Riverside. The proposed Project is not located along or within view of a scenic boulevard, parkway or special boulevard as designated by the City's General Plan 2025 and therefore would not have any effect on any scenic resources within a City-designated scenic roadway. **No impact** would occur directly, indirectly, and cumulatively.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly-accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

1c. Response: ***(Source: United States Census Bureau 2010 Census-Urbanized Area Reference Map*** (USCB, 2012)***; General Plan 2025*** (City of Riverside, 2007b)***; Citywide Design and Sign Guidelines*** (City of Riverside, 2019a)***; and proposed CSBP Specific Plan Amendment)***

Less than Significant Impact. The United States Census Bureau (USCB) defines "urbanized area" as a densely settled core of census tracts and/or census blocks that have 50,000 or more residents and meet minimum population density requirements while also being adjacent to territory containing non-residential urban land uses. The Project site is located within the boundaries of the Census-defined "Riverside-San Bernardino, CA 75340" urbanized area; therefore, the proposed Project would be considered to result in a significant adverse impact under this threshold only if the Project design would conflict with applicable zoning and other regulations governing scenic quality. Site photographs are provided on Figure 27.

The proposed Project would involve development of the Project site, which is currently vacant, with 156 residential units in 78 two-story duplex buildings and five one-story common buildings, and associated recreational amenities and open space/landscaping. Relevant to regulations governing scenic quality, the proposed Project includes (1) amendment to the General Plan land use designation for the Project site from C - Commercial to MU-U Mixed Use-Urban, (2) a rezone to change the zoning classification of the Project site from Office (O) – Specific Plan Overlay (Canyon Springs Business Park) to MU-U-SP Mixed Use-Urban – Specific Plan Overlay (Canyon Springs Business Park), and (3) an amendment to the CSBP Specific Plan to allow for the proposed residential development. Development within the Project site would be required to comply with the CSBP Specific Plan amendment, and notably the established development standards for proposed new PA 8B. The proposed Project's design, including layout, architecture, and landscaping is discussed in the Description of Project section of this Initial Study and would be consistent with the development standards established for PA 8B in the proposed CSBP Amendment (e.g., lot sizes, setbacks, landscaping, walls/fences, building height, lighting standards, and open space). The proposed CSBP Amendment also requires that development within PA 8B comply with the design criteria listed in Chapter 3.B: Multi-Family Residential Design of the Riverside Citywide Design Guidelines. As previously described, the proposed residential buildings would have a maximum height of 29 feet, 9 inches (maximum height of 30 feet allowed). The proposed architecture is a distinct Spanish style characterized by low- to moderate-pitched "S"-tile roofs, stucco wall surfaces, and decorative accents like tilework, metal elements, and shaded entryways. The color palette includes warm neutral stucco tones, terra-cotta and brown roof colors, and deeper accent hues in greens and browns for elements like shutters and trim. Where units front onto Gateway Drive and Canyon Park Drive, entry and front-yard spaces would be defined by arbors, which create transitions from public walkways to private entrances. Additionally, the Project would provide 45,065 sf of private open space, which exceeds the required 7,800 sf. Development in compliance with the proposed CSBP Amendment for PA 8B and the Citywide Design Guidelines for multi-family residential uses would ensure a high-quality aesthetic for the Project site.

The proposed Project is also consistent with the objectives and policies of the General Plan governing scenic quality as identified in the consistency analysis provided in Appendix A of this Initial Study.

In summary, the proposed Project has been designed to be compatible with the surrounding area and has been subject to the required City development review to ensure consistency with the applicable development standards identified in the proposed CSBP Plan Amendment, which requires compliance with the Citywide Design Guidelines for multi-family residential uses, and does not conflict with applicable General Plan objectives and policies. Therefore, the proposed Project would not conflict with regulations governing scenic quality and this impact would be **less than significant** directly, indirectly, and cumulatively.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

1d. Response: ***(Source: RMC Chapter 7.35 – General Noise Regulation, Chapter 19.556 – Outdoor Lighting, Chapter 19.590.070 – Light and Glare; General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area*** (City of Riverside, 2007b)***; and proposed CSBP Specific Plan Amendment)***

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Less Than Significant Impact. Existing sources of light and glare in the vicinity of the Project site include streetlights along Gateway Drive and Canyon Park Drive, and outdoor security and safety lighting associated with adjacent and nearby uses. The proposed Project would introduce new light sources at the Project site during construction and operation that currently do not exist.

New sources of light and glare during Project construction would primarily be for security purposes and would be temporary; this lighting would cease upon construction completion. In accordance with Riverside Municipal Code (RMC) Chapter 7.35, Project construction activity would be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. Saturdays, excluding Sundays and City-observed federal holidays (unless otherwise approved by the City of Riverside). If the Project Applicant receives express permission from the City to conduct nighttime construction activities, pursuant to City Municipal Code Chapter 19.556, such nighttime lighting would be required to be directed to the work area to prevent significant lighting impacts on adjacent properties. Therefore, short-term construction-related impacts associated with light and glare would be less than significant directly, indirectly, and cumulatively.

New operational light sources would be typical of a residential neighborhood, and would include exterior building lights, internal roadway and pathway lights, and pool and recreation area lights, garage lights, automobile headlights, security lighting, decorative landscape lighting, etc. These light sources would be similar to existing light sources at adjacent development that contribute to light and glare and affect the nighttime sky in the vicinity of the Project area. There are no light-sensitive uses adjacent to the Project site. The residential uses further to the south would be physically separated from the proposed Project by distance (approximately 0.2 mile). Further, on-site lights would be installed in compliance with RMC Chapter 19.556 and Section 19.590.070, and the proposed CSBP Amendment. RMC Chapter 19.556 sets forth standards to ensure that lighting provided for projects is adequate to light the project for safety while not causing light spillage onto neighboring properties. Section RMC 19.590.070 establishes performance standards for light and glare and identifies required lighting for safety purposes (at entryways, along walkway, between buildings, and within parking areas). The proposed CSBP Amendment identifies that on-site lighting is required to provide a minimum average of one foot-candle, with a maximum of 10 foot-candles of illuminance. A photometric study was completed for the proposed Project and demonstrates that the average illuminance for the entire site would be 1.1 footcandles and the maximum illuminance would be 5.5 footcandles. The Project site is also located outside the Mount Palomar Policy Area; thus, the Project would not affect nighttime observations from the Mount Palomar Observatory.

The Project would use a variety of non-reflective building materials, and although some new reflective improvements (i.e., windows) would be introduced to the Project site, the proposed Project would not be a source of glare in the Project area.

Therefore, long-term impacts associated with light and glare would be **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

2a. Response: ***(Source: General Plan 2025 FPEIR Section 5.2, Agricultural Resources*** (City of Riverside, 2007b)***; and California Department of Conservation Important Farmland Finder*** (DOC, 2025)***)***

No Impact. According to the City's General Plan 2025 FPEIR and the California Department of Conservation, the Project site does not contain any soils mapped as "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance". The Project site and surrounding areas are classified by the California Department of Conservation as Urban and Built-Up Land. As such, implementation of the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. **No impact** would occur directly, indirectly, and cumulatively.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

2b. Response: ***(Source: General Plan 2025 FPEIR Section 5.2, Agricultural Resources*** (City of Riverside, 2007b)***; and California Department of Conservation Important Farmland Finder*** (DOC, 2025)***)***

No Impact. The Project site is not subject to a land conservation (Williamson Act) contract (DOC, 2025; City of Riverside, 2007b). In addition, the Project site is zoned O-SP: Office – Specific Plan Overlay Zone (Canyon Springs Business Park) under existing conditions. Therefore, the proposed Project would not conflict with existing zoning for an agricultural use or a Williamson Act contract. **No impact** would occur directly, indirectly, and cumulatively.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

2c. Response: ***(Source: Map Riverside*** (City of Riverside, 2025b)***)***

No Impact. The Project site is not zoned as forest land, timberland, or Timberland Production, nor is it surrounded by forest land, timberland, or Timberland Production land. Therefore, the proposed Project has no potential to conflict with or cause the rezoning of any areas currently zoned as forest, timberland, or Timberland Production and would not result in the rezoning of any such lands. As such, **no impact** would occur directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

2d. Response: ***(Source: Map Riverside*** (City of Riverside, 2025b)***)***

No Impact. The Project site and surrounding areas do not contain forest land. Thus, the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use. As such, **no impact** would occur directly, indirectly, and cumulatively.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

2e. Response: (Source: ***General Plan 2025 FPEIR Section 5.2, Agricultural Resources*** (City of Riverside, 2007b)***; California Department of Conservation Important Farmland Finder*** (DOC, 2025)***; and Map Riverside*** (City of Riverside, 2025b)***)***

No Impact. As noted above in Responses 2a, 2c, and 2d, the Project site and surrounding do not contain Farmland or forestland. Additionally, there are no agricultural resources or operations or forestland resources occurring within the Project site or surrounding areas. Thus, the proposed Project would not result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. **No impact** would occur directly, indirectly, and cumulatively.

3. AIR QUALITY				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

3a. Response: ***(Source: Air Quality Analysis, prepared by Urban Crossroads (UXR), dated February 2026*** (UXR, 2026a) ***[Technical Appendix B1])***

Less than Significant Impact. An Air Quality Analysis was prepared for the proposed Project (refer to Technical Appendix B1 of this Initial Study) and is summarized herein.

The Project site is located within the South Coast Air Basin (SCAB) within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB is a 6,745 square-mile subregion of the SCAQMD, which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as State and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet State and federal ambient air quality standards. Currently, these State and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

In December 2022, the SCAQMD released the Final 2022 AQMP (2022 AQMP). The 2022 AQMP continues to evaluate current integrated strategies and control measures to meet the National Ambient Air Quality Standards (NAAQS), as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the

federal, State, and local levels. Similar to the 2016 AQMP, the 2022 AQMP incorporates scientific and technological information and planning assumptions, including the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements. The proposed Project's consistency with the AQMP will be determined using the 2022 AQMP as discussed below. It should be noted that although SCAG adopted the 2024-2050 RTP/SCS in April 2024, the 2022 AQMP is based on the 2020-2045 RTP. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below:

> *Consistency Criterion No. 1: Potential to result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*
>
> Consistency Criterion No. 1 refers to violations of the California Ambient Air Quality Standards (CAAQS) and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded. As evaluated under Responses 3b and 3c below, the proposed Project's localized and regional construction-source emissions would not exceed applicable regional significance threshold and the SCAQMD's localized significance thresholds (LST). Additionally, the Project's regional operation-source emissions would not exceed applicable regional significance thresholds. As such, the proposed Project would be consistent with the first criterion.
>
> *Consistency Criterion No. 2: Potential to exceed the assumptions in the AQMP based on the years of Project build-out phase.*
>
> The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the City of Riverside General Plan is considered to be consistent with the AQMP. Peak day emissions generated by construction activities are largely independent of land use assignments but rather are a function of development scope and maximum area of disturbance. Irrespective of the Project site's land use designation, development of the Project site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, when considering that no emissions thresholds would be exceeded, a less than significant impact would result.
>
> The City of Riverside General Plan designates the Project site for non-residential development consistent with the existing CSBP Specific Plan. The proposed Project involves a General Plan Amendment, rezone, and CSBP Amendment to allow for residential development. The proposed Project includes the development of 156 residential units and associated amenities. Although the proposed uses would require a General Plan Amendment and rezone, the proposed Project would increase regional households by approximately 156 households. According to SCAG's 2024-2050 RTP/SCS, housing within Riverside County in 2019 was approximately 744,000 households with an anticipated increase to approximately 1,062,000 households by 2050, a growth of approximately 318,000 households. The proposed Project represents 0.05 percent of the anticipated increase in homes, and therefore, would not result in long-term operational household growth that exceeds planned growth projections in the RTP/SCS or the AQMP. The proposed Project on an individual basis does not have an impact and as such, the proposed Project would not conflict with the goals and objectives of the AQMP. Furthermore, the Project, as evaluated herein would not exceed the regional or localized air quality significance thresholds.

In summary, the proposed Project would not have the potential to result in or cause NAAQS or CAAQS violations and would be consistent with AQMP Criterion No. 1 and No. 2. As a result, the proposed Project would not conflict with or obstruct implementation of the 2022 AQMP. As such, this impact would be **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. 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?	☐	☐	☒	☐

3b. Response: ***(Source: Air Quality Analysis, prepared by Urban Crossroads (UXR), dated February 2026*** (UXR, 2026a) ***[Technical Appendix B1])***

Less Than Significant Impact. The proposed Project has the potential to generate criteria pollutant emissions during both construction activities and long-term operation. The following analysis is based on the applicable significance thresholds established by the SCAQMD for regional criteria pollutant emissions (as summarized in Table 3-1 of the Air Quality Analysis included in Technical Appendix B1). This analysis assumes that the proposed Project would comply with applicable, mandatory regional air quality standards, including: SCQMD Rule 402, Nuisance; SCAQMD Rule 403, Fugitive Dust; SCAQMD Rule 445, Wood Burning Devices; SCAQMD Rule 1113, Architectural Coatings; and SCAQMD Rule 1401, New Source Review of Toxic Air Contaminants.

The latest version of California Emissions Estimator Model (CalEEMod) was utilized to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendix 3.1 of the Air Quality Analysis (Technical Appendix B1). For purposes of technical analysis in this Initial Study, construction is conservatively anticipated to begin in January 2027 and last through October 2028; however, construction may be initiated later than January 2027. The construction schedule utilized in the analysis represents a conservative analysis scenario should construction occur any time after the respective dates, since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity and associated equipment are described in Section 3.4 of the Air Quality Analysis (Technical Appendix B1).

Table 1 Construction Emissions Summary

Year	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	$PM_{10}T$	$PM_{2.5}T$
Summer						
2027	6.93	30.22	39.51	0.06	2.79	1.42
2028	4.20	1.74	5.15	0.01	0.91	0.24
Winter						
2027	7.14	64.43	66.12	0.15	8.28	4.37
2028	4.18	1.79	4.30	0.01	0.91	0.24
Maximum Daily Emissions	7.14	64.43	66.12	0.15	8.28	4.37
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Note: CalEEMod construction-source (unmitigated) emissions are presented in Appendix 3.1 of the Air Quality Analysis (Technical Appendix B1).
Source: (UXR, 2026a)

Impact Analysis from Construction Emissions

Construction activities associated with the proposed Project would result in emissions of Volatile Organic Compounds (VOCs), Nitrogen Oxides (NO_X), Sulfur Oxides (SO_X), Carbon Monoxide (CO), Particulate Matter 10 microns in diameter or less (PM_{10}), and Particulate Matter 2.5 microns in diameter or less ($PM_{2.5}$). Construction-related emissions are expected from the following construction activities: site preparation and grading; foundation; curb and gutter and paving; framing and

architectural coating (building construction); and installation of on-site wet and dry utilities. Refer to Section 3.4 of the Air Quality Analysis (Technical Appendix B1) for a description of the inputs and assumptions used to estimate the proposed Project's construction-related air quality emissions. CalEEMod calculates maximum daily emissions for summer and winter periods. As such, the estimated maximum daily construction emissions for both summer and winter periods are summarized in Table 1. As shown, emissions resulting from the construction of the proposed Project would not exceed criteria pollutant thresholds established by the SCAQMD.

Impact Analysis from Operational Emissions

Operational activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions are expected from the following primary sources: mobile source emissions, area source emissions, and energy source emissions. Refer to Section 3.5 of the Air Quality Analysis (Technical Appendix B1) for a description of the model inputs and assumptions used to estimate the Project's operational-related air quality emissions.

Operational activities for summer and winter scenarios are presented in Table 2. As shown, the proposed Project would not exceed the numerical thresholds of significance established by the SCAQMD for emissions of any criteria pollutant.

Table 2 Summary of Peak Operational Emissions

Source	Emissions (lbs/day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Mobile	5.29	5.25	51.15	0.14	12.69	3.29
Area	6.16	2.67	9.97	0.02	0.21	0.21
Energy	0.08	1.40	0.60	0.01	0.11	0.11
Maximum Daily Emissions	11.53	9.33	61.71	0.16	13.02	3.61
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Winter						
Mobile	4.98	5.63	42.56	0.13	12.69	3.29
Area	5.39	2.59	1.10	0.02	0.21	0.21
Energy	0.08	1.40	0.60	0.01	0.11	0.11
Maximum Daily Emissions	10.44	9.62	44.26	0.16	13.02	3.61
SCAQMD Regional Thresholds	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Note: CalEEMod operational-source (unmitigated) emissions are presented in Appendix 3.1 of the Project's Air Quality Analysis (Technical Appendix B1).
Source: (UXR, 2026a)

Health Consequences

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, the California Supreme Court held that an Environmental Impact Report's (EIR) air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts or meaningfully explain why that analysis cannot be provided. Most local agencies, including the City of Riverside, lack the data to do their own assessment of potential health impacts from criteria

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

air pollutant emissions, as would be required to establish customized, locally-specific thresholds of significance based on potential health impacts from an individual development project. The use of national or "generic" data to fill the gap of missing local data would not yield accurate results because such data does not capture local air patterns, local background conditions, or local population characteristics, all of which play a role in how a population experiences air pollution. Because it is impracticable to accurately isolate the exact cause of a human disease (for example, the role a particular air pollutant plays compared to the role of other allergens and genetics in causing asthma), existing scientific tools cannot accurately estimate health impacts of the proposed Project's air emissions without undue speculation. Instead, readers are directed to the proposed Project's air quality impact analysis above and in Response 3c below, which provides extensive information concerning the quantifiable and non-quantifiable health risks related to the proposed Project's construction and long-term operation.

The Air Quality Analysis (Technical Appendix B1) evaluates the proposed Project's localized impact to air quality for emissions of construction-related CO, NO_X, PM_{10}, and $PM_{2.5}$ by comparing the proposed Project's on-site emissions to the SCAQMD's applicable LST thresholds. The LST analysis presented in Response 3b below determined that the proposed Project would not result in emissions exceeding SCAQMD's LSTs. Therefore, the proposed Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$. As the proposed Project's emissions would comply with federal, state, and local air quality standards, the proposed Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level and would not provide a reliable indicator of health effects if modeled.

Therefore, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard. This impact would be **less than significant** directly, indirectly and cumulatively.

c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

3c. Response: ***(Source: Air Quality Analysis, prepared by Urban Crossroads (UXR), dated February 2026*** (UXR, 2026a) ***[Technical Appendix B1]; and Construction Health Risk Assessment, prepared by Urban Crossroads, dated January 2026*** (UXR, 2026b) ***[Technical Appendix B2])***

Less Than Significant Impact. Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, and individuals with pre-existing respiratory or cardiovascular illness. Structures that house these persons or places where they gather are defined as "sensitive receptors." These structures typically include uses such as residences, hotels, and hospitals where an individual can remain for 24 hours. The following provides an analysis of the potential for the proposed Project to exceed SCAQMD LSTs, to result in or contribute to CO "hot spots," and to result in health risks during construction.

The following provides an analysis of the proposed Project's potential to expose sensitive receptors in the vicinity of the Project site to substantial pollutant concentrations during Project construction. Receptors are shown on Figure 28. The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). The SCAQMD has established that localized impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the NAAQS and/or CAAQS. Collectively, these are referred to as LSTs. Additional information about the LST Methodology is provided in the Air Quality Analysis (Technical Appendix B1).

Construction-Related Localized Emissions

Emissions during peak construction activity would not exceed the SCAQMD's LST at the maximally exposed receptor location, as shown on Table 3. All other modeled locations would experience lower concentrations, resulting in a reduced impact. AERMOD Outputs from the model runs for construction LSTs are provided in Appendix 3.2 of the Air Quality Analysis (Technical Appendix B1).

Table 3 Construction Localized Significance Summary Construction

Peak Construction	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	8-Hours	1-Hour	24-Hours	24-Hours
Peak Day Localized Emissions	0.23	0.06	1.26E-01	0.29	0.14
Background Concentration [1]	3.3	1.2	0.056	-	
Total Concentration	3.53	1.26	0.18	0.29	0.14
SCAQMD Localized Significance Threshold	20	9	0.18	10.4	10.4
Threshold Exceeded?	NO	NO	NO	NO	NO

[1] Highest concentration from the last three years of available data.
Notes: PM_{10} and $PM_{2.5}$ concentrations are expressed in $\mu g/m^3$. All others are expressed in ppm.
Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO_2.
Source: (UXR, 2026a)

Operational Localized Emissions

The Project includes the development of 156 residential units and associated resident amenities. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed Project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed Project does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term LST analysis is required.

Carbon Monoxide (CO) "Hot Spot" Analysis

A CO hotspot is defined as a localized concentration of carbon monoxide exceeding the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. At the time the most recent CEQA Air Quality Handbook (1993) was published by SCAQMD, the air basin was designated as non-attainment, requiring projects to perform hotspot analyses to ensure they did not worsen the existing conditions. Over the last two decades, background CO concentrations have been significantly reduced due to regulatory controls on tailpipe emissions, which have culminated in the air basin achieving attainment status for CO. The 2003 AQMP's findings underscore that CO hotspots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the state's attainment status for CO further diminish the need for detailed microscale hotspot analyses, reinforcing that existing monitoring and regulatory frameworks adequately address potential air quality concerns.

In 2003 the SCAQMD, as part of its AQMP development process, prepared modeling to determine the potential for CO Hotspots at the four busiest intersections in the air basin. As summarized in the 2003 AQMP, even at one of the busiest intersections at that time, only 0.7 ppm of CO is attributable to vehicular traffic and the remaining 7.7 ppm were due to ambient background conditions. As shown on Table 2-5 of the Air Quality Analysis (Technical Appendix B1), the background 1-hour and 8-hour concentrations are well below the applicable ambient air quality standards. The 2003 AQMP's findings underscore that CO hotspots are highly unlikely due to the reduced background concentrations and the effectiveness of California's air quality management strategies. The substantial reduction in CO levels from the vehicle fleet and the state's attainment status for CO further diminish the need for detailed microscale hotspot analyses, reinforcing that existing monitoring and regulatory frameworks adequately address potential air quality concerns.

As such, proposed Project-related traffic at any intersections within the Project area would not cause or contribute to a CO hotspot since the background concentrations are low and any contribution from Project traffic would be negligible.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Construction-Source Diesel Particulate Matter (DPM)

A Construction Health Risk Assessment (HRA) was prepared for the proposed Project based on SCAQMD guidelines to produce conservative estimates of human health risk posed by exposure to diesel particulate matter (DPM). The proposed Project's Construction HRA is included as Technical Appendix B2 to this Initial Study. Refer to Section 2 of the Construction HRA for a discussion of the recommended methodology, emissions estimation, exposure quantification, carcinogenic chemical risk, and non-carcinogenic exposure used as inputs to the analysis. The modeled receptors are shown on Figure 28 and modeled construction emissions sources are shown on Figure 29.

The land use with the greatest potential exposure to proposed Project construction-source DPM emissions is the residential use at Location R1 which is located at 21710 Eucalyptus Avenue, approximately 1,143 feet south of the Project site. Location R1 is placed at the building façade. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to proposed Project construction-source DPM emissions is estimated at 0.54 in one million, which is less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable threshold of 1.0. Location R1 is the nearest residential receptor to the Project site and would experience the highest concentrations of DPM during proposed Project construction due to meteorological conditions at the site. Because all other modeled receptors would experience lower concentrations of DPM during proposed Project construction, all other receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the proposed Project would not cause a significant human health or cancer risk to adjacent land uses as a result of construction activities associated with the proposed Project.

The worker receptor land use with the greatest potential exposure to proposed Project construction-source DPM emissions is Location R4, which represents the potential worker receptor, County of Riverside Government Office located at 2724 Gateway Drive, approximately 77 feet west of the Project site. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.18 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. Location R4 is the worker receptor that would experience the highest concentrations of DPM during proposed Project construction due to meteorological conditions at the site. All other worker receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the proposed Project would not cause a significant human health or cancer risk to nearby workers.

The nearest school and location of the maximally exposed individual school child (MEISC) is Edgemont Elementary School, approximately 739 feet south of the Project site and represented by Receptor R2. At the MEISC, the maximum incremental cancer risk impact attributable to the proposed Project is calculated to be 0.44 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the proposed Project were calculated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled school receptors would be exposed to lower concentrations of DPM, all other school receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEISC identified herein.

Based on the preceding analysis, construction and operation of the proposed Project would not expose sensitive receptors to substantial pollutant concentrations and this impact would be **less than significant** directly, indirectly and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3d. Response: ***(Source: Air Quality Analysis, prepared by Urban Crossroads (UXR), dated February 2026*** (UXR, 2026a) ***[Technical Appendix B1])***

Less Than Significant Impact. Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The proposed Project would involve the development of residential uses and associated amenities and would not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and are thus considered less than significant. It is expected that refuse generated by the proposed Project would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors and other emissions (such as those leading to odors) associated with construction and operations activities of the proposed Project would be **less than significant** directly, indirectly, and cumulatively.

4. BIOLOGICAL RESOURCES Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

4a. Response: ***(Source: Habitat Assessment and Western Riverside County MSHCP Consistency Analysis for the Proposed Multi-Family Development Project (Independence at Canyon Springs), prepared by ELMT Consulting, dated April 2025*** (ELMT, 2025) ***[Technical Appendix C])***

A Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis (Biological Resources Report) was prepared by ELMT Consulting (ELMT) and is included in Technical Appendix C of this Initial Study. The Biological Resources Report documents the existing biological resources on the Project site, evaluates potential impacts to these resources that may occur as a result of implementation of the proposed Project, and describes the methodology for the analysis.

Less Than Significant Impact with Mitigation. The Project site occurs in an area that historically supported agricultural activities. The Project site is surrounded to the west by office uses; to the north by vacant, undeveloped land with Corporate Center Place and Campus Parkway beyond; to the east by Canyon Park Drive with vacant, undeveloped land and commercial development beyond; and to the south by Gateway Drive with vacant land, office development, and an elementary school beyond. The Project site itself consists of vacant, undeveloped land which historically supported agricultural land uses that have been heavily impacted by anthropogenic disturbances. These disturbances have eliminated the natural plant communities that were once present on and surrounding the Project site. No native plant communities or natural communities of special concern were observed on or adjacent to the Project site. The Project site supports two land cover types that would be classified as disturbed and ornamental vegetation as shown on
Figure 30.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Special Status Vegetation Communities

The California Natural Diversity Database (CNDDB) lists one special-status habitat as being identified within the Riverside East quadrangle: Southern Sycamore Alder Riparian Woodland; however, no California Department of Fish and Wildlife (CDFW) special-status plant communities occur within the boundaries of the Project site. **No impact** to special status vegetation communities would occur directly, indirectly, and cumulatively.

Special-Status Plants

According to the CNDDB and California Native Plant Society (CNPS), 13 special-status plant species have been recorded in the Riverside East quadrangle. No special-status plant species were observed on the Project site during the field investigation conducted by ELMT. The Project site and surrounding area have been subject to decades of anthropogenic disturbances which have removed native plant communities that historically occurred. Based on habitat requirements for specific species and the availability and quality of on-site habitats, no special-status plant species have potential to occur on-site due to the lack of native habitats and routine on-site disturbances, and all special-status plant species are presumed absent. **No impact** to special-status plants would occur directly, indirectly, and cumulatively.

Special-Status Wildlife

According to the CNDDB, 69 special-status wildlife species have been reported in the Riverside East quadrangle. No special-status wildlife species were observed on the Project site during the field investigation conducted by ELMT. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the Project site has a moderate potential to support Cooper's hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), and California horned lark (*Eremophila alpestris actia*). None of these special-status wildlife species are state or federally listed as threatened or endangered. Additionally, the Project site does not have potential to support any of the other special-status wildlife species known to occur in the vicinity of the site and all other special-status wildlife species are presumed absent.

The burrowing owl (*Athene cunicularia*) is currently listed as a candidate species under the California Endangered Species Act (CESA). Despite a systematic search of the Project site, no burrowing owls or sign (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. The majority of the Project site is vegetated with a variety of low-growing plant species that allow for line-of-sight observation favored by burrowing owl. However, no suitable mammal burrows or structures/pipes that have the potential to provide suitable burrowing owl nesting habitat (>4 inches in diameter) were observed within the boundaries of the Project site. Further, trees found onsite, and surrounding electrical poles north of the Project site, provide suitable perching opportunities for large raptors (i.e., red-tailed hawk) that can prey on burrowing owl. As a result, burrowing owl are presumed absent from the Project site. Notwithstanding, as identified in mitigation measure MM BIO-1, a 30-day pre-construction burrowing owl survey would be conducted prior to any ground disturbing activities to avoid direct take of burrowing owls, in accordance with Objective 6 of the Species Account for the Burrowing Owl included in the Western Riverside County MSHCP.

Crotch's bumblebee (*Bombus crotchii*) is a candidate species for listing status by the CESA. Generally, for all bumble bee species, high-quality habitat has three major components: a diverse supply of flowers for nectar and pollen, nesting locations, and subterranean spaces for overwintering queens. Based on the results of the habitat assessment conducted by ELMT, the Project site and immediately surrounding areas were determined to provide low plant diversity for nectar sources for Crotch's bumblebee. Further, no bumble bees have been recorded in the immediate vicinity of the Project site. Due to existing anthropogenic disturbances on and surrounding the Project site, low plant diversity for nectar sources, and lack of recorded occurrences in the immediate vicinity of the Project site, Crotch's bumble bee was determined to have a low potential to occur on the Project site.

Accordingly, impacts to special-status wildlife would be **less than significant with mitigation incorporated** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Critical Habitat

The Project site is not located within federally designated Critical Habitat. The nearest designated Critical Habitat is located approximately 5.65 miles north of the Project site for coastal California gnatcatcher (*Polioptila californica californica*). Therefore, the loss or adverse modification of Critical Habitat would not occur as a result of the Project. **No impact** to critical habitat would occur directly, indirectly, and cumulatively.

The proposed Project would not 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 CDFW and U.S. Fish and Wildlife Service (USFWS). This impact would be **less than significant with mitigation incorporated** directly, indirectly, and cumulatively.

Mitigation

MM BIO-1 In accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days prior to commencement of any ground-disturbing activities at the Project site. Although not anticipated, if burrowing owls are detected on-site during the pre-construction survey, coordination with the CDFW shall occur to determine if an Incidental Take Permit under Section 2081 of the CESA is required. A copy of the results of the pre-construction survey (and all additional surveys) shall be provided to the City of Riverside Planning Division for review prior to any vegetation clearing and ground-disturbing activities.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

4b. Response: ***(Source: Habitat Assessment and Western Riverside County MSHCP Consistency Analysis for the Proposed Multi-Family Development Project (Independence at Canyon Springs), prepared by ELMT Consulting, dated April 2025*** (ELMT, 2025) ***[Technical Appendix C])***

No Impact. The habitats observed on the Project site (ornamental vegetation and disturbed) are not classified as a riparian habitat or as a sensitive natural community in local or regional plans, policies, or regulations, or by CDFW or USFWS. Further, no jurisdictional drainage and/or wetland features were observed on the Project site during the field investigation, and no blueline streams have been recorded on the Project site. As discussed under Response 4d below, the Project site does not support Riparian/Riverine Areas and Vernal Pools pursuant to the Western Riverside County MSHCP. As such, development of the Project would not result in impacts to U.S. Army Corps of Engineers (Corps), Regional Board, or CDFW jurisdiction. Accordingly, implementation of the proposed Project would result in **no impacts** to a riparian habitat or sensitive natural community directly, indirectly, and cumulatively.

c. 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?	☐	☐	☐	☒

4c. Response: ***(Source: Habitat Assessment and Western Riverside County MSHCP Consistency Analysis for the Proposed Multi-Family Development Project (Independence at Canyon Springs), prepared by ELMT Consulting, dated April 2025*** (ELMT, 2025) ***[Technical Appendix C])***

No Impact. The Project site is located within an urbanized area where no federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) exist on site or within proximity

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
to the Project site. The Project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and thus does not include Corps jurisdictional drainages or wetlands. Therefore, implementation of the proposed Project would result in **no impact** to state or federally-protected wetlands directly, indirectly, and cumulatively.				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐

4d. Response: ***(Source: Habitat Assessment and Western Riverside County MSHCP Consistency Analysis for the Proposed Multi-Family Development Project (Independence at Canyon Springs), prepared by ELMT Consulting, dated April 2025*** (ELMT, 2025) ***[Technical Appendix C])***

Less than Significant with Mitigation.

Migratory Corridors and Linkages

Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors are similar to linkages but provide specific opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. It is possible for a habitat corridor to be adequate for one species yet still inadequate for others. Wildlife corridors are features that allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. Additionally, open space can provide a buffer against both human disturbance and natural fluctuations in resources.

The Project site has not been identified as occurring in a wildlife corridor or linkage. The proposed Project would be confined to existing areas that have been heavily disturbed, surrounded by existing development, and are isolated from regional wildlife corridors and linkages. In addition, there are no riparian corridors, creeks, or useful patches of steppingstone habitat (natural areas) within or connecting the site to a recognized wildlife corridor or linkage. As such, implementation of the proposed Project would not impact wildlife movement opportunities. Therefore, **no impacts** to wildlife corridors or linkages would occur directly, indirectly, or cumulatively.

Avian Nesting

No active nests were observed on-site. Although subjected to routine disturbance, the ornamental vegetation on the eastern boundary of the Project site has the potential to provide suitable nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that could occur in the area that are adapted to urban environments. In addition, the disturbed portions of the Project site have the potential to support ground-nesting birds such as killdeer. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513) prohibits the take, possession, or destruction of birds, their nests or eggs). Impacts to nesting birds would be considered a potentially significant impact prior to mitigation. As identified in mitigation measure MM BIO-2, if construction would occur between February 1st and August 31st, a pre-construction clearance survey for nesting birds would be required within three days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds would be disturbed during construction. The Project Applicant would be required to comply with mitigation measure MM BIO-2 to ensure compliance with respective regulations. MM BIO-2 would reduce potential impacts to the nesting birds to less than significant levels by ensuring that pre-construction surveys are conducted to determine the presence or absence of nesting birds on or adjacent to the Project site prior to the commencement of construction activities. If active bird nests are present, this mitigation measure provides performance criteria that requires avoidance of the nests until it can be determined the nest is no longer active or that the juveniles from the occupied nests are capable of surviving independently of the nest. Impacts would be **less than significant with mitigation incorporated** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Mitigation **MM BIO-2** If construction occurs between February 1st and August 31st, a qualified wildlife biologist shall conduct a pre-construction clearance survey for nesting birds within three days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds shall be disturbed during construction. The biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active avian nests shall occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a no-disturbance buffer. The size of the no-disturbance buffer shall be determined by the wildlife biologist and shall depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise, species habituation, and topographical barriers. These factors shall be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor shall be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
4e. Response: ***(Source: Western Riverside County MSHCP*** (County of Riverside, 2003)***; RMC Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee; City of Riverside Urban Forest Tree Policy Manual; and Habitat Assessment and Western Riverside County MSHCP Consistency Analysis for the Proposed Multi-Family Development Project (Independence at Canyon Springs), prepared by ELMT Consulting, dated April 2025*** (ELMT, 2025) ***[Technical Appendix C])*** **Less Than Significant Impact.** Implementation of the Project is subject to applicable federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. Any project within the City that proposes planting a street tree within a City right-of-way is required to follow the City's Urban Forestry Policy Manual. The Manual includes guidelines for the planting, pruning, preservation, and removal of all trees on City rights-of-way. The guidelines are based on national standards for tree care, as established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. Any new street trees planted as part of the landscape plan for the proposed Project would also be in compliance with the City's Urban Forestry Policy Manual and consistent with the landscape palette in the CSBP Specific Plan Amendment for PA 8B. Additionally, as shown on the conceptual landscape plan provided on Figure 18, the existing Albizia trees along Gateway Drive and Magnolia trees along Canyon Park Drive adjacent to the Project site would be retained. The Project does not propose any tree plantings within the City's right-of-way. Compliance with these City requirements would prevent adverse impacts related to tree preservation policies. The Project Applicant would also pay the applicable Western Riverside County MSHCP local development mitigation fee, in compliance with RMC Section 16.72.040. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources impacts. This impact would be **less than significant** directly, indirectly, and cumulatively.				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?	☐	☐	☐	☒

5a. Response: ***(Source: Phase I Historical/Archaeological Resources Survey for the Independence at Canyon Springs Project, prepared by CRM Tech, dated August 19, 2025*** (CRM Tech, 2025) ***[Technical Appendix D])***

No Impact. Based on the research results presented in the Historical/Archaeological Resources Survey discussed under Response 5b below, no built-environment features more than 50 years of age were encountered within or adjacent to the Project site. Accordingly, the proposed Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines. **No impact** would occur directly, indirectly, and cumulatively.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☒	☐	☐

5b. Response: ***(Source: Phase I Historical/Archaeological Resources Survey for the Independence at Canyon Springs Project, prepared by CRM Tech, dated August 19, 2025*** (CRM Tech, 2025) ***[Technical Appendix D]; and General Plan 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity*** (City of Riverside, 2007b)***)***

Less than Significant Impact with Mitigation. A Phase I Historical/Archaeological Resources Survey (Historical/Archaeological Resources Survey) was prepared for the proposed Project by CRM Tech to determine whether the proposed Project would cause substantial adverse changes to any "historical resources," as defined by CEQA, that may exist in or around the Project site. The Historical/Archaeological Resources Survey is included as Technical Appendix D of this Initial Study. Preparation of the Historical/Archaeological Resources Survey included a cultural resources records search at the South Coastal Information Center (SCIC) for the Project site and a one-mile radius, a Sacred Lands File (SLF) Search, coordination with local Native American representatives, historical background research, and an intensive-level field survey with the assistance of Native American monitors from the Soboba Band of Luiseño Indians and the Pechanga Band of Indians.

According to SCIC records, the entire Project site was included in a previous survey that covered nearly 360 acres in the Canyon Springs area in 1980, prior to the commercial/industrial development that transformed the landscape in the area. Outside the Project site and within the one-mile scope of the records search, SCIC records identify 44 additional studies on various tracts of land and linear features, including a linear survey in 1991 for the Inland Feeder pipeline project near the northeastern corner of the Project area. Despite these past survey efforts, no archaeological sites, or artifacts of either prehistoric or historical origin were previously recorded within or adjacent to the Project site. However, a large property of Native American traditional cultural value, designated Site 33-029890 (CA-RIV-13301) in the California Historical Resources Inventory, has been delineated in the Project vicinity on the basis of information provided by the Pechanga Band of Indians, and its boundaries encompasses the entire Project area. Known as the Pechanga Sycamore Hills Traditional Cultural Property, Site 33-029890 is a 25,642-acre cultural landscape lying across the eastern side of the City of Riverside, the western side of the City of Moreno Valley, and the northern side of the City of Perris, to which the Pechanga Band attaches religious and cultural significance.

As its name indicates, Site 33-029890 was delineated on the basis of Native American traditional cultural value and prehistoric aboriginal land use. This cultural landscape spans across multiple local jurisdictions and the City of Riverside cannot study this vast area for a limited-scale project such that a systematic evaluation of Site 33-029890 in its entirety as a potential "historical resource" is well beyond the scope needed to evaluate this Project. No associated features or artifacts have been found in or near the Project site. The physical characteristics of the Project site, resulting from extensive disturbances from agricultural activities and ground clearing over the past decades, retain little vestige of the native landscape and thus do not contribute to the potential significance and/or integrity of Site 33-029890. Furthermore, past development in the surrounding area, including the construction of office buildings on adjacent properties, has completely altered the

environmental setting of the area in relation to the prehistoric landscape. Therefore, the Historical/Archaeological Resources Survey concludes that Site 33-029890 has little potential to be impacted by the development of this property and, as such, requires no further consideration in the planning process for the proposed Project.

Within the one-mile scope of the records search, 14 additional cultural resources have been recorded into the California Historical Resources Inventory, including 13 historical/archaeological sites and one isolate (i.e., a locality with fewer than three artifacts), as listed in Table 1 of the Historical/Archaeological Resources Survey. Five of the sites were of prehistoric (i.e., Native American) origin, and four of these consisted of milling slicks on bedrock boulder outcrops. The other one represents the Soboba Sycamore Hills Traditional Cultural Property, essentially the same cultural landscape as Site 33-029890 but with its boundaries delineated based on information from the Soboba Band of Luiseño Indians. Measuring 11,419 acres in total area, Site 33-029890 lies generally to the west of the I-215 corridor, roughly ⅓ mile to ½ mile west of the Project site.

Eight of the previously recorded sites dated to the historic period, as did the isolate. The sites included the former California Southern Railroad, an abandoned target range with concrete bunkers and spent bullets, refuse deposits, structural remains, and three single-family residences dating to the early or mid-20th century, while the isolate consisted of fragmented glass insulators. Other than Site 33-029890, none of the known cultural resources was found in the immediate vicinity of the Project site, the nearest one being at least ⅓ mile from this location.

A description of the cultural setting (prehistoric, ethnohistoric, and historic context) for the Project site is presented in the Historical/Archaeological Resources Survey provided in Technical Appendix D of this Initial Study.

Based on the research results presented in the Historical/Archaeological Resources Survey (Technical Appendix D), no archaeological sites or artifacts of prehistoric origin were previously recorded within or adjacent to the Project site. Additionally, no surface manifestation of any prehistoric archaeological remains, or any bedrock outcrops or other natural features that would typically attract prehistoric human use were observed during the field survey.

Geospatial analyses of known prehistoric sites in inland southern California suggest that longer-term residential settlements of the Native population were more likely to occur in sheltered areas near the base of hills and/or on elevated terraces, hills, and finger ridges near permanent or reliable sources of water, while the level, unprotected valley floor was used mainly for resource procurement, travel, and occasional camping during these activities. This is corroborated by the ethnographic literature that identifies foothills as preferred settlement environment for Native Americans of the Inland Empire region. Based on this settlement pattern, the general location of the Project site on the open valley floor with no reliable water source nearby would not have provided a favorable setting for permanent or long-term habitation by the aboriginal population during prehistoric times. Instead, as the presence of bedrock milling features with shallow slicks in the vicinity of the Project suggests the area was more likely used for seasonal resource gathering. The extent of previous ground disturbance, demonstrated by the presence of approximately three feet of fill soil on the surface further diminishes the likelihood of any subsurface prehistoric cultural remains surviving intact within the Project site. Underneath the fill stratum, geotechnical exploratory borings at the Project site encountered older alluvium, typically deposited before widespread human occupation in inland southern California, to the depths or 20 to 50 feet. Based on the condition of the soils on site and the age of the native sediments below surface, the Project site is considered to be relatively low in sensitivity for buried cultural remains of prehistoric and early historic origin. This is consistent with General Plan 2025 FPEIR Figure 5.5-1 and Figure 5.5-2, which show that the Project site is located in an area with low sensitivity for archaeological sensitivity prehistoric cultural resources sensitivity.

Notwithstanding, if any resources are unearthed during construction of the proposed Project that meet the definition of a significant archaeological resource pursuant to CEQA Guidelines Section 15064.5, and are disturbed or damaged by construction activities, impacts to those prehistoric cultural resources would be potentially significant. Therefore, the Historical/Archaeological Resources Survey recommends that if buried cultural materials are discovered during earth-moving operations, all work in the immediate vicinity should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds. Mitigation is thus required for the proposed Project that sets forth procedures that shall be followed should subsurface resources be discovered. Accordingly, mitigation measure MM CUL-1 through MM

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

CUL-4 are required and identify requirements for archaeological monitoring during ground-disturbing activities, cultural sensitivity training, and actions to be taken if any resources are discovered. With implementation of MM CUL-1 through MM CUL-4, the proposed Project's potential impacts to previously-undiscovered subsurface archaeological resources would be **less than significant** directly, indirectly, and cumulatively.

Mitigation

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

MM-CUL-2: Archaeological and Tribal Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. **Cultural Resources Monitoring Plan:** The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include:
   a. Project grading and development scheduling;
   b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;
   c. The protocols and stipulations that the Applicant, tribes, and project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;
   d. Treatment and final disposition of any cultural, sacred sites, and human remains if discovered on the project site; and
   e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-4.

2. **Native American Monitor:** Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s) regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following:
   a. The treatment of known tribal cultural resources;
   b. The treatment and final disposition of any tribal cultural resources, sacred sites, archaeological and cultural resources inadvertently discovered on the Project site;
   c. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

d. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities.

e. The developer/permit applicant shall provide sufficient evidence that they have made a reasonable effort to reach an agreement with the consulting tribes regards to items a-d, as listed above.

MM CUL-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 C**uration 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. 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, South Costal Information Center, and consulting tribes.

MM CUL-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.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

5c. Response: ***(Source: Phase I Historical/Archaeological Resources Survey for the Independence at Canyon Springs Project, prepared by CRM Tech, dated August 19, 2025*** (CRM Tech, 2025) ***[Technical Appendix D])***

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Less Than Significant. The Project site does not contain a known cemetery and is not known to contain any buried human remains. Human burials, in addition to being potential archaeological resources, have specific provisions for treatment set forth in Section 5097.98 of the California Public Resources Code (PRC). It is not likely that human remains would be discovered during construction of the proposed Project. However, in the unlikely event human remains are encountered, disturbing human remains could violate the health code, potentially destroy the resource, and would be considered a significant impact. If human remains are unexpectedly unearthed during construction, the construction contractors would be required by law to comply with California Health and Safety Code Section 7050.5, Disturbance of Human Remains. According to Section 7050.5(b) and (c), if human remains are discovered outside of a dedicated cemetery, the County Coroner must be contacted, and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California PRC Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to PRC Section 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. With mandatory compliance to California Health and Safety Code Section 7050.5 and PRC Section 5097.98, any potential impacts to human remains, including human remains of Native American ancestry, that may result from construction of the proposed Project would be **less than significant** directly, indirectly, and cumulatively.

6. ENERGY

Would the project:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

6a. Response: ***(Source: Independence at Canyon Springs Energy Analysis, prepared by Urban Crossroads, dated August 2026*** (UXR, 2026c) ***[Technical Appendix E])***

Less than Significant. An Energy Analysis was prepared for the proposed Project (refer to Technical Appendix E of this Initial Study) and is summarized herein.

Energy Use During Construction

Construction of the proposed Project would consume energy in the use of fossil-fueled and electric-powered construction equipment, fossil-fueled construction vendor/hauling trucks, and fossil-fueled and electric-powered construction worker commute vehicles. Construction equipment used for the proposed Project would result in single event consumption of diesel fuel. Based on CalEEMod estimations presented in the Energy Analysis (Technical Appendix E), construction-related vehicle trips would result in approximately 762,402 vehicle miles traveled (VMT) and consume an estimated 41,474 gallons of gasoline and diesel combined during construction. Additionally, on-site construction equipment would consume an estimated 47,602 gallons of diesel fuel. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations (CCR), Title 13, Sections 2449 and 2485, limit idling from both on-road and off-road diesel-powered equipment and are enforced by the California Air Resources Board (CARB). Additionally, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, and with adherence to applicable regulatory requirements, the construction phase of the proposed Project would not result in wasteful, inefficient, and unnecessary consumption of energy.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Energy Use During Operations

Operation of the proposed Project would consume energy as part of building operations and transportation activities including passenger vehicle traffic. Building operations would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, refrigeration, lighting, and electronics. The proposed Project would be all-electric and it is anticipated that solar would be utilized for on-site generation. However, as further discussed in the Energy Analysis (Technical Appendix E), the Energy Analysis conservatively does not take credit for these Project features. Based on CalEEMod energy use estimations, operations for the proposed Project would result in approximately 5,548,033 kBTU/year of natural gas and 1,509,199 kWh/year of electricity demand annually.

Energy efficiency/energy conservation attributes of the proposed Project would be complemented by increasingly stringent state and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24 energy efficiency standards [Title 24 standards], California Green Building Standards Code [CALGreen]). Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards are widely regarded as the most advanced energy efficiency standards and would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation.

Operational energy would also be consumed during vehicle trips associated with the proposed Project. Fuel consumption would be primarily related to vehicle use by residents, visitors, and employees associated with the Project. Trip generation and VMT generated by the proposed Project are consistent with other residential uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual and CalEEMod. Based on CalEEMod energy use estimations, Project-related vehicle trips would result in approximately 5,500,632 VMT and consume an estimated 212,013 gallons of gasoline and diesel combined, annually. The Project is within close proximity of existing land uses that would provide future residents access to facilities such as schools, supermarkets, restaurants and other commercial uses, which would further reduce fuel consumption demand. Additionally, enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. The proposed Project's location near regional and local road networks helps decrease VMT in the area, which in turn reduces the overall energy demand for vehicles in the region. The proposed Project would implement pedestrian facilities and bike lanes, which would facilitate, encourage, and connect access to regional shopping areas that are located approximately 0.5-mile from the Project site. Additionally, facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption.

Accordingly, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation and this impact would be **less than significant** directly, indirectly, and cumulatively.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

6b. Response: ***(Source: Independence at Canyon Springs Energy Analysis, prepared by Urban Crossroads, dated August 2026*** (UXR, 2026c) ***[Technical Appendix E])***

Less than Significant. A discussion of the proposed Project's consistency with applicable State and local plans related to energy is provided below. As shown, the proposed Project would not conflict with a State or local plan for renewable energy or energy conservation.

Construction

The proposed Project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings used during

construction, lighting, and other sources. CCR Title 13, Sections 2449 and 2485 limit idling from both on-road and off-road diesel-powered equipment and are enforced by the Air Resources Board (ARB). The proposed Project would comply with these regulations. There are no policies at the local level applicable to energy conservation specific to the construction phase. Thus, it is anticipated that construction of the proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy.

Operation

California's Renewable Portfolio Standard (RPS) establishes a goal of renewable energy for local providers to be 44 percent by 2040. Similarly, the State is promoting renewable energy targets to meet the 2022 Scoping Plan greenhouse gas emissions reductions. The proposed Project would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the California Title 24 energy standards. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards, widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Additionally, the proposed Project would be all-electric and would not use natural gas, and would utilize on-site solar generation.

State and Local Plan Consistency

Consistency with Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of inter-modal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions. Transportation and access to the Project site is provided by the local and regional roadway systems. The proposed Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site. Consistency with ISTEA supports decreasing overall per capita energy consumption and decreased reliance on fossil fuels, consistent with State CEQA Guidelines Appendix F as residents traveling to and from the site can use public transportation which would decrease fuel and overall VMT.

Consistency with the Transportation Equity Act for the 21st Century (TEA-21)

The Transportation Equity Act for the 21st Century (TEA-21) was signed into law in 1998 and builds upon the initiatives established in the ISTEA legislation, discussed above. The TEA-21 authorizes highway, highway safety, transit, and other efficient surface transportation programs. The 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. The TEA-21 also provides for investment in research and its application to maximize the performance of the transportation system through. The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the proposed Project facilitates access, acts to reduce vehicle miles traveled, takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The proposed Project supports the strong planning processes emphasized under TEA-21. The proposed Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21. Consistency with TEA-21 supports decreasing overall per capita energy consumption and decreased reliance on fossil fuels, consistent with State CEQA Guidelines Appendix F as residents traveling to and from the Project site can use public transportation which would decrease fuel and overall VMT.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Consistency with the Integrated Energy Policy Report (IEPR)

Senate Bill (SB) 1389 (Bowen, Chapter 568, Statutes of 2002) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (PRC Section 25301[a]). The 2024 Integrated Energy Policy Report (IEPR) was adopted September 2025, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2024 IEPR provides critical updates on California's energy future, focusing on several key areas. It includes an updated energy demand forecast, offering revised projections for electricity consumption and generation needs. Additionally, the report evaluates the feasibility, costs, and potential benefits of wave and tidal energy resources in accordance with SB 605, which aims to explore alternative renewable energy sources for the State. Compared to the 2023 IEPR, the 2024 update introduces new insights and considerations, particularly in the context of emerging renewable energy technologies like wave and tidal energy and further refines the demand forecasts. This edition provides a more comprehensive view of California's evolving energy landscape and the role of innovative resources in meeting future energy needs. Electricity would be provided to the Project by Riverside Public Utilities (RPU). RPU's Energy Efficiency Programs build on existing state programs and policies. As such, the proposed Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the 2024 IEPR. Additionally, the proposed Project would comply with the applicable Title 24 standards which would ensure that the proposed Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. As such, development of the proposed Project would support the goals presented in the 2024 IEPR. Consistency with the IEPR supports decreasing overall per capita energy consumption, decreased reliance on fossil fuels and increased reliance on renewable energy sources, consistent with State CEQA Guidelines Appendix F.

Consistency with State of California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The State Energy Plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators and encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access. The Project site is located along major transportation corridors with proximate access to the Interstate freeway system. The site selected for the proposed Project facilitates access, takes advantage of existing infrastructure systems, and promotes land use compatibilities. The proposed Project, therefore, supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan. Consistency with the State of California Energy Plan supports decreasing overall per capita energy consumption and reliance on fossil fuels, consistent with State CEQA Guidelines Appendix F as residents traveling to and from the site can use public transportation which would decrease fuel and overall VMT.

Consistency with Title 24 Energy Efficiency Standards and California Green Building Standards

CCR Title 24 Part 6: The California Energy Code was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. CCR, Title 24, Part 11: California Green Building Standards Code is a comprehensive and uniform regulatory code for all residential, commercial, and school buildings that went in effect in 2009, and is administered by the California Building Standards Commission. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2025 California Green Building Code Standards effective on January 1, 2026. The Project would be subject to applicable Title 24 standards and CALGreen requirements at the time building permit document submittals are made. Therefore, the proposed Project would not result in a significant impact on energy resources. Consistency with Title 24 standards support decreasing overall per capita energy consumption, decreased reliance on fossil fuels, and increased reliance on renewable energy sources consistent with State CEQA Guidelines Appendix F as the Project would need to incorporate energy efficiency standards.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Consistency with AB 1493 Pavley Regulations and Fuel Efficiency Standards

California Assembly Bill (AB) 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions, specifically, a co-benefit of the Pavley standards is an improvement in fuel efficiency and consequently a reduction in fuel consumption. AB 1493 is not applicable to the Project as it is a statewide measure establishing vehicle emissions standards. No feature of the proposed Project would interfere with implementation of the requirements under AB 1493. This would also ensure consistency with State CEQA Guidelines Appendix F as the proposed Project would not interfere with implementation of AB 1493, therefore, decreasing reliance on fossil fuels.

Consistency with Renewable Portfolio Standard (RPS)

First established in 2002 under SB 1078, California's Renewable Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable resources to 44 percent of total retail sales by 2024. California's RPS is not applicable to the proposed Project as it is a Statewide measure that establishes a renewable energy mix. No feature of the proposed Project would interfere with implementation of the requirements under the RPS. This would also ensure consistency with State CEQA Guidelines Appendix F as the proposed Project would not interfere with implementation of the RPS, therefore, increasing reliance on renewable energy sources.

Consistency with SB 350

In October 2015, the legislature approved and the Governor signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies towards a regional electricity grid, and improved infrastructure for electric vehicle charging stations. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33 percent to 50 percent by 2030, with interim targets of 40 percent by 2024, and 45 percent by 2027.
- Double the energy efficiency in existing buildings by 2030. This target will be achieved through the California Public Utility Commission (CPUC), the CEC, and local publicly owned utilities.
- Reorganize the Independent System Operator to develop more regional electricity transmission markets and to improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

The proposed Project would use energy from RPU, which has committed to diversify its portfolio of energy sources by increasing energy from wind and solar sources. No feature of the proposed Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new residential developments and would include several measures designed to reduce energy consumption. This would also ensure consistency with State CEQA Guidelines Appendix F as the Project would not interfere with implementation of SB 350, therefore, increasing reliance on renewable energy sources.

Executive Order N-79-20 and Advanced Clean Cars II

On August 25, 2022, CARB approved the Advanced Clean Cars II rule, which codifies the goals set out in Executive Order N-79-20 and establishes a year-by-year roadmap such that by 2035, 100 percent of new cars and light trucks sold in California will be zero-emission vehicles. Under this regulation, automakers are required to accelerate deliveries of zero-emission light-duty vehicles, beginning with model year 2026. CARB estimates that between 2026 and 2040, the regulation would reduce GHG emissions by a cumulative 395 million metric tons, equivalent to reducing petroleum use by 915 million barrels. The Project would not interfere with implementation of Executive Order N-79-20 or the Advanced Clean Cars II regulation. All

vehicles accessing the Project site would be subject to statewide vehicle emission standards and fleet turnover requirements established by CARB. As newer, more efficient, and zero-emission vehicles replace older vehicles over time, Project-related mobile-source emissions and fuel consumption would decrease consistent with statewide regulatory requirements. Consistency with Executive Order N-79-20 and Advanced Clean Cars II supports decreasing overall per capita energy consumption and reducing reliance on fossil fuels, consistent with State CEQA Guidelines Appendix F, as vehicle electrification and improved fuel economy standards would reduce gasoline consumption and associated energy demand over the life of the proposed Project.

City of Riverside General Plan

The proposed Project has been evaluated for consistency with applicable policies from the General Plan 2025, particularly those supporting energy efficiency, air quality improvement, and sustainable development. Relevant objectives and policies from the Air Quality, Open Space & Conservation, and Public Facilities and Infrastructure Elements are summarized in Appendix A, with an emphasis on those most pertinent to energy conservation and GHG reduction as presented in Technical Appendix E of this Initial Study. As identified, the proposed Project is consistent with these General Plan policies through its commitment to all-electric residential development, compliance with Title 24 energy standards in effect at the time building permits are requested, integration of energy-efficient appliances and systems, and incorporation of walkability and connectivity features that support alternative transportation. Additionally, the proposed Project would implement construction waste diversion measures, and landscaping plans that contribute to reduced energy demand, further aligning with the City's long-term sustainability goals.

City of Riverside Restorative Growthprint (RRG) Climate Action Plan (CAP)

The City of Riverside collaborated with the Western Riverside Council of Governments (WRCOG) on a Subregional Climate Action Plan (CAP), and subsequently adopted the Riverside Restorative Growthprint (RRG) CAP, which builds upon the WRCOG framework to establish local GHG reduction targets through 2035. While the City's CAP is not a qualified GHG reduction plan under CEQA Guidelines Section 15183.5, it does include numerous measures and strategies intended to support both greenhouse gas and energy reduction goals. Specifically, the Energy sector of the RRG CAP promotes the use of energy-efficient building design, appliance standards, renewable energy systems (e.g., solar photovoltaic [PV]), and electrification of buildings and vehicles to reduce community-wide energy demand and associated emissions. These measures are consistent with the City's broader climate objectives, including reducing dependence on fossil fuels, enhancing local energy resilience, and achieving long-term carbon neutrality by 2040 as proposed under the City's forthcoming Climate Action and Adaptation Plan (CAAP). As discussed in the GHG Emissions section of this Initial Study, the proposed Project would not conflict with the RRG CAP.

Consistency with CEQA Appendix F

As supported in the preceding analysis, the proposed Project would achieve the goals of energy conservation as identified in Appendix F of the State CEQA Guidelines. The proposed Project would decrease overall per capita energy consumption by being consistent with the ISTEA, TEA-21, 2024 IEPR, State of California Energy Plan, Title 24 Standards, and other applicable regulations. The proposed Project would decrease reliance on fossil fuels such as coal, natural gas and oil by being consistent with the ISTEA, TEA-21, 2024 IEPR, State of California Energy Plan, Title 24 Standards and AB 1493. The proposed Project would increase reliance on renewable energy sources by being consistent with the 2024 IEPR, Title 24 Standards, RPS, and SB 350. Compliance with the aforementioned mandatory regulations would ensure that the proposed Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy.

As such, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and this impact would be **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒

7i. Response: ***(Source: General Plan 2021-2029 Public Safety Element Technical Background Report Figure CP-1 – Regional Fault Zones*** (City of Riverside, 2021b)***; and Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Multi-Family Residential Development Independence at Canyon Springs prepared by LOR Geotechnical Group, Inc., dated April 2025*** (LOR Geotechnical Group, 2025) ***[Technical Appendix F])***

No Impact. There are no known active or potentially active earthquake faults on the Project site or trending towards the Project site and the Project site is located outside of the Alquist Priolo Special Studies Zone. Because there are no known faults extending through the Project site, there is no potential for implementation of the Project to directly or indirectly expose people or structures to adverse effects related to rupture of a known earthquake fault. Accordingly, **no impact** would occur directly, indirectly, and cumulatively.

ii. Strong seismic ground shaking?	☐	☐	☒	☐

7ii. Response: ***(Source: General Plan 2021-2029 Public Safety Element Technical Background Report Figure CP-1 – Regional Fault Zones*** (City of Riverside, 2021b)***; and Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Multi-Family Residential Development Independence at Canyon Springs prepared by LOR Geotechnical Group, Inc., dated April 2025*** (LOR Geotechnical Group, 2025) ***[Technical Appendix F])***

Less than Significant Impact. The Project site is located in a seismically active area of southern California. As shown in Figure CP-1 – Regional Fault Zones in the General Plan 2021-2029 Public Safety Element Technical Background Report, the San Jacinto Fault Zone (located northeast of the City and approximately 6.0 miles northeast of the site) and the Elsinore Fault Zone (located south of the City's Sphere of Influence and approximately 16.4 miles southwest of the site) have the potential for moderate to large earthquakes that would cause intense ground shaking at the site. Therefore, the Project site is expected to experience ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the southern California area and is considered adequately mitigated to protect public health, safety, and welfare if buildings are designed and constructed in conformance with applicable building codes and sound engineering practices. As a mandatory Project condition of approval, the proposed buildings would be required to be constructed in accordance with the California Building Standards Code (CBSC) (CCR Part 2 of Title 24). The CBSC provides standards that have been specifically tailored for California earthquake conditions and regulate the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures in order to safeguard life or limb, health, property, and public welfare. In addition, the CBSC (Chapter 18) require development projects to prepare geologic engineering reports to identify site-specific geologic and seismic conditions and provide site-specific recommendations including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, and selection of appropriate structural systems, to preclude adverse effects resulting from strong seismic ground-shaking. The Project Applicant retained a professional geotechnical firm, LOR Geotechnical Group, to prepare such a geotechnical report for the Project site (Preliminary Geotechnical Investigation) which is included in Technical Appendix F of this Initial Study. With mandatory compliance with the CBSC, as well as the standard and Project-specific design and construction recommendations set forth in the Project's Preliminary Geotechnical Investigation, the proposed residential development would be constructed to withstand seismic ground shaking sufficiently to preclude a substantial risk to people or structures related to strong seismic ground shaking. Impacts involving strong seismic ground shaking would be **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒

7iii. Response: ***(Source: General Plan 2021-2029 Public Safety Element Technical Background Report Figure CP-2 – Liquefaction Zones*** (City of Riverside, 2021b)***; and Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Multi-Family Residential Development Independence at Canyon Springs prepared by LOR Geotechnical Group, Inc., dated April 2025*** (LOR Geotechnical Group, 2025) ***[Technical Appendix F])***

No Impact. The potential for liquefaction generally occurs during strong ground shaking within granular loose sediments where the groundwater is usually less than 50 feet below the ground surface. The Project site is located in an area with a low potential for liquefaction, per General Plan 2021-2029 Public Safety Element Technical Background Report Figure CP-2, Liquefaction Zones. The Project-specific Preliminary Geotechnical Investigation, which identifies that groundwater at the Project site was encountered at 48.5 feet bgs, concludes that because the site is underlain by relatively dense/stiff to very dense/hard older alluvial materials there is no possibility of liquefaction at the site. Additionally, the Project would be required to be designed and constructed in accordance with applicable seismic safety guidelines, including the standard requirements of the CBSC, and in accordance with the recommendations contained in the Project-specific Preliminary Geotechnical Investigation (Technical Appendix F). Therefore, implementation of the proposed Project would not directly or indirectly expose people or structures to substantial hazards associated with seismic-related ground failure and/or liquefaction hazards. **No impact** would occur directly, indirectly, and cumulatively.

iv. Landslides?	☐	☐	☐	☒

7iv. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope*** (City of Riverside, 2007b)***; and Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Multi-Family Residential Development Independence at Canyon Springs prepared by LOR Geotechnical Group, Inc., dated April 2025*** (LOR Geotechnical Group, 2025) ***[Technical Appendix F])***

No Impact. The Project site is generally flat and contains no substantial natural or man-made slopes. On-site elevation ranges from approximately 1,562 to 1,571 feet above mean sea level (amsl) and the site slopes slightly from north to south. Additionally, there are no natural or man-made slopes in the Project vicinity. According to the General Plan 2025 FPEIR Figure 5.6-1, slopes on the Project site range from 0 to 10 percent. The general lack of surface relief indicates the area is relatively stable and not subject to landsliding. The proposed Project would retain the flat topography of the site and would not create or be exposed to landslide hazards. Therefore, proposed Project would not directly or indirectly expose people or structures to substantial hazards associated with landslides. **No impact** would occur directly, indirectly, and cumulatively.

b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

7b. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types and Table 5.6-B – Soil Types*** (City of Riverside, 2007b)***; and RMC Title 18 – Subdivision Code, Title 17 – Grading Code and SWPPP)***

Less Than Significant Impact. The Project site does not contain steep slopes, but General Plan 2025 FPEIR Figure 5.6-4 shows that the Project site is underlain by Monserate soils and Cieneba, which have moderate and high erosion potential, respectively. Erosion and loss of topsoil could occur as a result of ground disturbance activities during construction of the proposed Project. The National Pollutant Discharge Elimination System (NPDES) Construction General Permit calls for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for establishing erosion and sediment control Best Management Practices (BMPs) during construction activities (refer to Section 9, Hydrology and Water Quality, of this Initial Study). The proposed Project would be subject to the NPDES Construction General Permit and must implement the BMPs in a Project-specific SWPPP.

In the long term, because the Project site currently has exposed soil, the proposed Project would decrease the amount of pervious surface, resulting in less surface area exposed to potential erosion. Soil and pollutants flowing off site (by wind or water erosion) would be reduced by landscaping areas and paved areas. Thus, areas of exposed soils would be minimal following construction of the proposed Project, and the potential for erosion would be limited. Additionally, the Project site

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
is not intended to be used for agricultural or other purposes that require topsoil. In addition, the City's erosion control standards (in RMC Title 18, Subdivisions) and the City's Grading Code (RMC Title 17) also require the implementation of measures to minimize soil erosion. Compliance with NPDES Construction General Permit requirements, as well as with RMC Titles 18 and 17, would ensure that soil erosion or the loss of topsoil would be **less than significant** directly, indirectly, and cumulatively.				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

7c. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1, Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types*** (City of Riverside, 2007b)***; General Plan 2021-2029 Public Safety Element Technical Background Report Figure CP-1 – Regional Fault Zones, Figure CP-2 Liquefaction Zones*** (City of Riverside, 2021b)***; and Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Multi-Family Residential Development Independence at Canyon Springs prepared by LOR Geotechnical Group, Inc., dated April 2025*** (LOR Geotechnical Group, 2025) ***[Technical Appendix F])***

Less Than Significant Impact. The general topography of the Project site and surrounding area is flat. On-site elevation ranges from 1,562 to 1,571 feet amsl. The soils on the Project site consist of artificial fill up to depths of approximately 3 feet, below which are older alluvium materials. The artificial fill materials mainly consist of silty sand to sandy silt believed to be associated with past site use as well as previous grading and weed abatement practices and are considered to be non-engineered fill. The older alluvium materials mainly consist of silty sand to sandy silt with occasional clayey sand units encountered. The Project-specific Preliminary Geotechnical Investigation (Technical Appendix F) describes on-site soil and geologic characteristics and provides recommendations to prevent unstable soil conditions and geologic hazards from Project development, if appropriate:

- **Landslides**: Due to the low relief of the Project site and surrounding region, there is no potential for landslides on the Project site. See Response 7a iv above.
- **Lateral spreading**: Adherence to the City's Grading and Subdivision Codes (RMC Titles 17 and 18), as well as the California Building Code (CBC) (as adopted by the City of Riverside and set out in RMC of the RMC) in the design and construction of the proposed Project would prevent lateral spreading. Additionally, lateral spreading is primarily associated with liquefaction, and as stated above under Response 7a iii, there is no potential for liquefaction at the Project site. As such, lateral spreading is not anticipated to occur.
- **Subsidence**: The Project-specific Preliminary Geotechnical Investigation (Technical Appendix F) indicates that based upon the relative compaction of the near surface soils and the relative compaction anticipated for compacted fill soil, a compaction shrinkage factor of approximately 5 to 10 percent is estimated. In addition, subsidence of approximately 0.10 feet is anticipated. Adherence to the City's grading and building requirements, and the recommendations presented in the Project-specific Preliminary Geotechnical Investigation (Technical Appendix F) would address potential subsidence during construction.
- **Liquefaction**: There is no potential for liquefaction at the Project site. See Response 7a iii above.

Collapse: The proposed Project would retain the flat topography of the site. Adherence to the City's grading and building requirements, and the recommendations presented in the Project-specific Preliminary Geotechnical Investigation (Technical Appendix F), would ensure that the property is adequately prepared to prevent the collapse of the graded pad.

Compliance with the City's grading and building codes, and the recommendations of the Project-specific Preliminary Geotechnical Investigation would ensure that impacts related to on-site soil and geologic conditions are **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐

7d. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types*** (City of Riverside, 2007b)***; General Plan 2021-2029 Public Safety Element Technical Background Report Figure PS-3 – Soils with High Shrink-Swell Potential*** (City of Riverside, 2021b)***; California Building Code as adopted by the City of Riverside and set out in RMC Title 16*** (City of Riverside, 2025a)***; and Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Multi-Family Residential Development Independence at Canyon Springs prepared by LOR Geotechnical Group, Inc., dated April 2025*** (LOR Geotechnical Group, 2025) ***[Technical Appendix F])***

Less Than Significant Impact. Expansive soil is defined under the CBC based on its potential to shrink or swell. General Plan 2021-2029 Public Safety Element Technical Background Report Figure PS-3 does not identify the site as having high shrink-swell potential and General Plan 2025 FPEIR Figure 5.6-4 shows that the site is underlain by Monserate soils, which have moderate potential for soil expansion, and Cieneba soils, which have low potential for soil expansion. The Project-specific Preliminary Geotechnical Investigation indicates that the upper materials encountered during the geotechnical investigation were tested and found to have a very low expansion potential. Therefore, specialized construction procedures to specifically resist expansive soil activity are not anticipated. Compliance with the recommendations of the Project-specific Preliminary Geotechnical Investigation and applicable provisions of the RMC Title 18 and the CBC would ensure that potential impacts related to expansive soils would be **less than significant** directly, indirectly, and cumulatively.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

7e. Response: ***(Source: Project Conceptual Utility Plan [refer to Figure 21a and Figure 21b of this Initial Study])***

No Impact. The proposed Project would be served by the public sewer system and would connect to the existing sewer infrastructure in the roadways adjacent to the Project site. The proposed Project would not utilize on-site septic tanks or alternative wastewater disposal systems. Therefore, the proposed Project would have **no impact** related to septic tanks or alternative waste water disposal systems directly, indirectly, and cumulatively.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

7f. Response: ***(Source: County of Riverside, Map My County, 2026*** (County of Riverside, 2026)***)***

Less than Significant Impact with Mitigation. As with archaeological resources, paleontological resources are generally considered to be historical resources, as defined in CEQA Guidelines Section 15064.5(a)(3)(D). Consequently, damage or destruction to these resources could cause a significant impact. Based on review of the County of Riverside's Map My County web map, the Project site and surrounding area have a high sensitivity for paleontological resources. The proposed Project would require excavations of up to 10 feet for installation of the storm water detention system, which would encroach into native sediment underlying artificial fill (with an estimated depth of approximately 3 feet). Therefore, there is a potential that ground-disturbing activities within the Project site could uncover previously unidentified paleontological resources resulting in a potentially significant impact. MM GEO-1 requires paleontological monitoring during ground disturbing activities in order to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources. Therefore, with implementation of MM GEO-1, this impact would be **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Mitigation

MM GEO-1 Prior to the issuance of grading permits and/or action that would permit ground disturbance, the Project Applicant shall provide written evidence to the City of Riverside that the Project Applicant has retained a qualified Paleontologist to prepare a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP), observe grading activities into the paleontologically sensitive soils, and to conduct salvage excavation of paleontological resources as necessary. Sediment samples should also be recovered to determine the small-fossil potential of the site. The Paleontologist shall be present at the pre-grading conference; shall establish procedures and a schedule for paleontological resources surveillance; and shall establish procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the fossils as appropriate. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the City of Riverside.

The Project Paleontologist shall prepare a final paleontological resource monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). All recovered fossils shall be offered for curation in perpetuity to the Western Science Center in Hemet, the principal fossils repository in Riverside County. A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to (and accepted by) the City of Riverside, shall signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.

8. GREENHOUSE GAS EMISSIONS Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

8a. Response: ***(Source: Independence at Canyon Springs Greenhouse Gas Analysis, prepared by Urban Crossroads, dated February 2026*** (UXR, 2026d) ***[Technical Appendix G])***

Less Than Significant Impact. A GHG Emissions Analysis was prepared for the proposed Project (refer to Technical Appendix G of this Initial Study) and is summarized herein. As further discussed in the GHG Emissions Analysis, Global Climate Change (GCC) refers to the change in average meteorological conditions on the earth with respect to temperature, wind patterns, precipitation, and storms. Gases that trap heat in the atmosphere are often referred to as greenhouse gases including carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. An individual project, like the proposed Project, cannot generate enough GHG emissions to affect a discernible change in global climate. However, the proposed Project may participate in the potential for GCC by its incremental contribution of GHGs combined with the cumulative increase of all other sources of GHGs, which when taken together constitute potential influences on GCC.

The GHG Emissions Analysis evaluates the proposed Project's potential to generate GHG emissions that could contribute to global climate change and its associated environmental effects. The latest version of CalEEMod was used to estimate construction-related and operational emissions resulting from the proposed Project. Output from the model runs for construction and operational activity for the proposed Project is provided in Appendix 3.1 of the GHG Emissions Analysis included in Technical Appendix G of this Initial Study. As described in the Project's GHG Emissions Analysis, the proposed Project would generate GHG emissions during construction and operation. Construction activities would generate CO_2 and CH_4 emissions. For construction phase emissions, GHGs are quantified and amortized over the life of a project. To amortize the emissions over the life of a project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions resulting from the proposed Project were amortized over a 30-year period and added to the annual operational phase GHG emissions as shown in Table 4.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Table 4 Project GHG Emissions

Source	Emissions (MT/yr)				
	CO_2T	CH_4	N_2O	R	Total CO_2e
Annual construction emissions amortized over 30 years	26.42	8.15E-04	1.09E-03	1.31E-02	26.78
Mobile	1,884.04	0.07	0.09	2.47	1,914.25
Area	39.93	0.00	0.00	0.00	39.98
Energy	588.47	0.05	0.00	0.00	590.66
Water	47.16	0.21	0.01	0.00	54.07
Waste	13.35	1.33	0.00	0.00	46.72
Refrigeration	0.00	0.00	0.00	0.24	0.24
Total CO_2e (All Sources)	2,672.70				

Source: (UXR, 2026d)

Operational activities associated with the proposed Project would result in emissions of CO_2, CH_4, N_2O, and refrigerant emissions from the following primary sources: mobile source emissions; area source emissions; energy source emissions; water supply, treatment, and distribution; solid waste; and refrigeration, which are described in the GHG Analysis.

The City of Riverside has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. In the absence of its own numeric threshold, the City has elected to use a significance threshold of 3,000 $MTCO_2e$ per year based on the SCAQMD staff's proposed GHG threshold for residential and commercial projects such as the proposed Project, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). This approach is a widely accepted screening threshold used by the City of Riverside and numerous cities in the SCAB. The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 $MTCO_2e$/yr, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation.

As shown in Table 4, construction and operation of the proposed Project would generate approximately 2,672.70 $MTCO_2e$/yr. Accordingly, the proposed Project would not exceed the SCAQMD screening threshold of 3,000 $MTCO_2e$ per year. Thus, the proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. This impact would be **less than significant** directly, indirectly, and cumulatively.

b. Conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

8b. Response: ***(Source: Independence at Canyon Springs Greenhouse Gas Analysis, prepared by Urban Crossroads, dated February 2026*** (UXR, 2026d) ***[Technical Appendix G])***

Less Than Significant Impact. A detailed discussion of regulation addressing GHG emissions is provided in the GHG Analysis included in Technical Appendix G of this Initial Study. Pursuant to 15604.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of impacts from GHG emissions. As such, the proposed Project's consistency with the 2022 Scoping Plan and the City of Riverside RRG CAP is discussed below. It should be noted that the proposed Project's consistency with the 2022 Scoping Plan also satisfies consistency with AB 32 since the 2022 Scoping Plan is based on the overall targets established by AB 32 and SB 32. Consistency with the 2008 and 2017 Scoping Plan is not necessary since both of these plans have been superseded by the 2022 Scoping Plan.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

2022 Scoping Plan Consistency

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the State in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine if a project would conflict with the 2022 Scoping Plan. The 2022 Scoping Plan includes three priority areas to reduce GHG emissions that would apply to all land use development projects. More specifically, the three priority areas include: (1) transportation electrification, (2) VMT reduction, and (3) Building Decarbonization. The potential for the proposed Project to conflict with these three priority areas is discussed as follows.

Transportation Electrification: No Conflict. The proposed Project would include electric vehicle (EV) charging infrastructure that, at minimum, would equal the Residential Mandatory Measures in CALGreen Sections 4.106.4.1, 4.106.4.2, 4.106.4.3 and A5.106.5.3. Therefore, the proposed Project does not conflict with this priority area.

VMT Reduction: No Conflict. As noted in the Project's VMT Assessment discussed in the Transportation section of this Initial Study, the proposed Project was evaluated and found to generate VMT below the City's adopted threshold resulting in a less than significant VMT impact. As such, the proposed Project would not conflict with this priority area.

Building Decarbonization: No Conflict. Per Title 24 requirements, the Project would be required to incorporate solar for the residential buildings. The Project would be all-electric with no use of natural gas. Additionally, the Project would be required to comply with all Title 24 Energy and CALGreen requirements as previously discussed in the Energy section of this Initial Study. As such, the Project does not conflict with this priority area.

City of Riverside Restorative Growthprint (RRG) Climate Action Plan (CAP)

As previously discussed in the Energy section of this Initial Study, the City of Riverside has adopted the RRG CAP, which expands upon the WRCOG Subregional CAP and outlines strategies to reduce community-wide GHG emissions through 2035. Although the CAP is not currently considered a qualified plan pursuant to CEQA Guidelines Section 15183.5, it offers relevant policies and measures that guide emissions reductions at the local level. The RRG CAP identifies emissions reduction strategies within four sectors: Energy, Transportation and Land Use, Water, and Solid Waste. The proposed Project's consistency with each sector is evaluated below to determine whether the proposed Project would conflict with or obstruct implementation of the CAP. As shown, the proposed Project would be consistent with each sector and therefore does not conflict with the CAP.

Energy: No Conflict. The proposed Project would be constructed in compliance with the Title 24 energy standards effective at the time of building permit application submittals. In accordance with State energy policy and Title 24, the proposed Project would include rooftop solar PV systems consistent with the City's RPU solar requirements. The proposed Project would be all-electric with no use of natural gas. The proposed Project also supports the intent of State and regional measures SR-2, SR-3, and local measure E-3 outlined in the RRG CAP by exceeding baseline energy efficiency requirements and supporting renewable energy implementation. Additionally, proposed Project landscaping would include shade trees consistent with RRG CAP local measure E-2, supporting urban heat island reduction.

Transportation and Land Use: No Conflict. The Project site is well-connected to existing transit options, including bus routes operated by Riverside Transit Agency (RTA), and is in proximity to commercial and institutional uses. The proposed Project would include pedestrian-friendly design elements such as sidewalks, walkways, and internal traffic calming features (e.g., raised pedestrian walkways or speed cushions along the internal north-south roads to help slow down traffic), consistent with RRG CAP measures T-1 through T-4 and T-8. The proposed Project would also install EV charging infrastructure in compliance with CALGreen Tier 1 requirements, aligning with CAP measure T-19. Although the proposed Project does not

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

create new transit systems or pedestrian-only districts, it does not obstruct such efforts and supports the City's goals for multimodal access and reduced vehicle trips.

Water: No Conflict. The proposed Project would reduce indoor and outdoor water demand through compliance with CALGreen and Title 24 water efficiency requirements. The proposed use of drought-tolerant landscaping and low-flow fixtures would support RRG CAP measure W-1, which aims to reduce per capita water use throughout the City. These features ensure that the proposed Project would not conflict with the City's water conservation goals.

Solid Waste: No Conflict. The proposed Project would implement a Construction Waste Management Plan during construction and comply with applicable State and local diversion requirements, including AB 341 and the City's mandatory Construction and Demolition (C&D) diversion ordinance. Solid waste generated during operations would be subject to City programs for green waste and organics collection, supporting RRG CAP Measures SW-1 and SW-2. As such, the proposed Project would not conflict with local solid waste reduction strategies.

Therefore, the proposed Project would not conflict with the 2022 Scoping Plan or applicable measures outlined in the RRG CAP. Therefore, the proposed Project would not conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases and this impact would be **less than significant** directly, indirectly, and cumulatively.

9. HAZARDS & HAZARDOUS MATERIALS Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

9a. Response: ***(Source: General Plan 2021-2029 Public Safety Element*** (City of Riverside, 2021b)***; General Plan 2025 FPEIR, Section 5.7, Hazards and Hazardous Material*** (City of Riverside, 2007b)***; Phase I Environmental Site Assessment Independence at Canyon Springs Proposed Multi-Family Residential Development, prepared by LOR Geotechnical Group, dated February 2026*** (LOR Geotechnical Group, 2026) ***[Technical Appendix H]; City of Riverside Local Hazard Mitigation Plan (LHMP)*** (City of Riverside, 2023)***; and RMC Chapter 9.48 – Unified Hazardous Materials Programs and RMC Section 19.590.030 - Hazardous and Toxic Materials)***

Less Than Significant Impact. The General Plan 2025 and General Plan 2025 FPEIR Section 5.7, Hazards and Hazardous Materials, generally discussed hazards to the environment or the public through the transport, use, or disposal of hazardous materials that are typically associated with the operation of non-residential uses, such as industrial and some commercial uses that use hazardous materials in large quantities. The Project site is not included in the lists of hazardous material facilities in the City as provided in the General Plan 2025 FPEIR and the Project-specific Phase I Environmental Site Assessment (ESA). Various federal, State, and local regulations are in place to prevent public safety hazards from improper use, handling, storage, transport, and disposal of hazardous materials. RMC Chapter 9.48 sets regulations for the City's hazardous materials programs, and RMC Chapter 19.590.030 establishes performance standards for hazardous and toxic materials. The City's Local Hazard Mitigation Plan (LHMP) addresses the City's planned responses to emergencies and hazards, including those involving hazardous materials.

Heavy equipment (e.g., dozers, excavators, tractors, cranes) would be operated on the Project site during construction of the proposed Project. This heavy equipment may be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than what would occur on any other similar construction site. Construction contractors would comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited to, the Toxic Substances Control Act, Hazardous Material Transportation Act, Resource

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Conservation and Recovery Act, California Hazardous Waste Control Act, California Accidental Release Prevention Program, the City's hazardous materials programs in RMC Chapter 9.48, and the Performance Standards for hazardous and toxic materials in RMC Section 19.590.030.

Consistent with existing residential and non-residential development in the vicinity of the Project site, once constructed, the proposed residential uses would use common hazardous materials primarily for maintenance activities. The proposed Project would utilize hazardous materials for maintenance of the proposed buildings, swimming pool, and other site improvements. The proposed residential Project would not involve the transport, use, or disposal of any hazardous material in large quantities because the proposed uses are limited to 156 residential units and associated resident amenities. Routine maintenance activities for the residential uses may include the storage and use of common hazardous materials such as cleansers, solvents, pesticides, pool cleaning supplies, paint, fertilizers, and similar materials. These materials would be in limited quantities (i.e., less than 55 gallons of a liquid, 500 pounds of a solid, 200 cubic feet of compressed gas, or any amount of an extremely hazardous substance per RMC Chapter 9.48). The maintenance contractor would comply with existing regulations regarding hazardous material use, storage, disposal, and transport as identified above.

Therefore, the proposed Project would not pose a significant threat to the public related to on-site hazardous material use, storage, and disposal. As such, impacts related to the transport, use, or disposal of any hazardous material would be **less than significant** directly, indirectly, and cumulatively.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

9b. Response: ***(Source: General Plan 2021-2029 Public Safety Element*** (City of Riverside, 2021b)***; General Plan 2025 FPEIR Tables 5.7 A – D*** (City of Riverside, 2007b)***; City of Riverside Local Hazard Mitigation Plan [LHMP]*** (City of Riverside, 2023)***; Phase I Environmental Site Assessment Independence at Canyon Springs Proposed Multi-Family Residential Development, prepared by LOR Geotechnical Group, dated February 2026*** (LOR Geotechnical Group, 2026) ***[Technical Appendix H]; and RMC Chapter 9.48 – Unified Hazardous Materials Programs and RMC Section 19.590.030 - Hazardous and Toxic Materials)***

Less Than Significant. A Phase I ESA was prepared for the proposed Project and is included in Technical Appendix H of this Initial Study. The Phase I ESA indicates that the Project site is not included on a list of hazardous material sites. The Project site was vacant land dating back to 1901, dry farmland from at least 1938 until no later than around the mid-1980s, mass/rough graded by 1989, and has remained vacant land since. With respect to prior agricultural activities, a Phase II ESA was previously performed in 2024 which involved surficial and near surface soil sample collection across the Project site based on a grid system. Nineteen discrete soil samples were collected at 0.5 and 1.5 feet bgs to assess shallow soils for potential impacts. These samples were composited into five samples for analysis and all five composite soil samples had no reported concentrations of chlorinated herbicides. Two of the soil samples analyzed for organochlorine pesticides (OCPs) had reported concentrations. These reported concentrations of OCPs were less than the California Department of Toxic Substances Control (DTSC) screening levels for residential soil. The range of reported concentrations of total heavy metals in all five samples were less than the DTSC soil screening levels for residential soil and/or were within expected background levels. None of the reported concentrations of OCPs and total heavy metals suggest subject property soils would require special handling and disposal.

Based on the findings of the Phase I ESA, the Project site exhibits no evidence of 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 the Project site that would prohibit its use as a residential development, and no further investigations were recommended.

As previously identified under Response 8a, the proposed Project would utilize hazardous materials during construction and maintenance activities. Compliance with existing regulations regarding hazardous material use, storage, disposal, and

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
transport, including RMC Chapter 9.48 and Section 19.590.030, would preclude any major threats to public health and safety due to upset or accident conditions. Due to the size and type of land uses proposed, hazardous material use would be in limited quantities and would be conducted in compliance with applicable federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous materials and hazardous waste. Impacts associated with potential upset and accident conditions involving the release of hazardous materials into the environment would be **less than significant** directly, indirectly, and cumulatively.				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
9c. Response: ***(Source: Google Earth)*** **Less Than Significant Impact.** Edgemont Elementary School, which is part of the Moreno Valley Unified School District, is located at 21790 Eucalyptus Avenue in the City of Moreno Valley, approximately 0.14-mile south of the Project site. All other schools are more than 0.25 miles from the Project site. The proposed Project is a residential development with 156 residential units and associated resident amenities that would not involve any uses or activities that would emit or require the handling of hazardous materials in measurable quantities (refer to the discussion provided under Response 9a above). The proposed Project would not result in hazardous emissions that may affect students at the Edgemont Elementary School. The use, storage, and transport of any hazardous materials used at the site would also be made in compliance with the applicable federal, State, and local laws and regulations. Therefore, the proposed Project would have a **less than significant** impact regarding emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school directly, indirectly, and cumulatively.				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
9d. Response: ***(Source: Phase I Environmental Site Assessment Environmental Site Assessment Independence at Canyon Springs Proposed Multi-Family Residential Development, prepared by LOR Geotechnical Group, dated February 2026*** (LOR Geotechnical Group, 2026) ***[Technical Appendix H])*** **No Impact.** A review of hazardous materials site lists compiled pursuant to Government Code Section 65962.5, conducted as part of the Phase I ESA, found that the Project site is not included on any such lists. Therefore, the Project would have **no impact** related to creating any significant hazard to the public or environment directly, indirectly, and cumulatively.				
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
9e. Response: ***(Source: City of Riverside 2021-2029 Public Safety Element Technical Background Report*** (City of Riverside, 2021b)***; March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan [ALUCP]*** (RCALUC, 2014)***; Riverside County Airport Land Use Commission Development Review*** (RCALUC, 2025)***; and Proposed March Air Reserve Base/Inland Port Airport Compatibility Map*** (RCALUC, 2026)***)*** **Less Than Significant Impact.** The Project site is located approximately 2.7 miles northeast of the MARB/IP Airport and within the Airport Influence Area (AIA), Compatibility Zone D, Flight Corridor Buffer, as depicted on Map MA-1 of the March Air Reserve Base/Inland Port (MARB/IP) Airport Land Use Compatibility Plan (ALUCP). The Project site is not				

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
within any MARB/IP Airport safety zones. The MARB/IP ALUCP does not include density limit on residential developments within Compatibility Zone D. The Project site is also located outside of the noise contours as described in the MARB/IP ALUCP. The proposed Project was reviewed by the Riverside County Airport Land Use Commission (RCALUC) on October 9, 2025, and the RCALUC determined that the proposed Project is consistent with the MARB/IP ALUCP, subject to identified conditions related to outdoor lighting, prohibited uses, notice of airport in the vicinity for future residents, detention basin requirements, notification requirements for land any uses having an electromagnetic radiation component, and review requirements for any changes to the proposed Project. These standard conditions will be included as Project conditions of approval (COA). Therefore, the proposed Project would have a **less than significant** impact regarding safety hazards for people residing or working in the Project area directly, indirectly, and cumulatively.				
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
9f. Response: ***(Source: General Plan 2025 FPEIR Chapter 5.7 – Hazards and Hazardous Materials*** (City of Riverside, 2007b)***; and City of Riverside Local Hazard Mitigation Plan [LHMP]*** (City of Riverside, 2023)***)*** **Less Than Significant Impact.** The proposed Project would be served by existing, fully improved streets, Gateway Drive and Canyon Park Drive, as well as a network of on-site streets. All streets have been designed to meet the Public Works and Fire Departments' specifications. Temporary street closing may be necessary during construction, including off-site roadways improvements, which are limited to striping, driveway access improvements, and utility connections. Any street closing would be of short duration and would not interfere or impede with any emergency response or evacuation plan. At least one lane of travel would be maintained in each direction at all times. Temporary street closure would comply with the Standard Specifications for Public Works Construction (Greenbook) (as amended and adopted by the City), which contains standards for maintenance of access; traffic control; and notification of emergency personnel. Therefore, the proposed Project would have a **less than significant** impact directly, indirectly, and cumulatively to an emergency response or evacuation plan.				
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
9g. Response: ***(Source: General Plan 2021-2029 Public Safety Element Technical Background Report Figure CP-5 – Very-High Fire Hazard Severity Zone Areas*** (City of Riverside, 2021b)***; and Cal Fire, Fire Hazard Severity Zones*** (Cal Fire, 2025)***)*** **No Impact**. The Project site is not in a City-designated Fire Hazard Area, as shown in Figure CP-5 of the General Plan 2021-2029 Public Safety Element Technical Background Report or in a very high fire hazard severity zone (VHFHSZ), as identified by the California Department of Forestry and Fire Prevention (Cal Fire). The nearest VHFHSZs are located 0.8-mile north and 0.8-mile southwest of the Project site. Therefore, the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. **No impact** would occur directly, indirectly, and cumulatively.				
10. HYDROLOGY AND WATER QUALITY Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
10a. Response: ***(Source: Project-Specific Water Quality Management Plan [WQMP], prepared by KHR Associates, dated January 2026*** (KHR Associates, 2026a) ***[Technical Appendix I1]; RMC Chapter 14.12 - Discharge of Wastes into the Public Sewer and Pollutants into the Storm Drain Systems; and General Plan 2025 FPEIR Figure 5.8-1 – Watersheds, Table 5.8-A – Beneficial Uses Receiving Water*** (City of Riverside, 2007a)***)***				

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (USEPA) has established regulations under the NPDES program to control direct storm water discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The Project site is within the jurisdiction of the Santa Ana RWQCB.

As shown on General Plan 2025 FPEIR Figure 5.8-1, Watersheds, the Project site is located within the Santa Ana River watershed. The beneficial uses of the Santa Ana River include agriculture; groundwater recharge; water-contact recreation; non-contact water recreation; warm freshwater habitat; wildlife habitat; rare, Threatened, or Endangered species; and spawning, reproduction, and development. The USEPA Section 303(d) List shows that Reach 3 of the Santa Ana River (where storm water from the site is conveyed) is considered impaired for copper, lead, toxicity, pyrethroids, bifenthrin, and indicator bacteria.

Construction-Related Water Quality Impacts

The proposed Project would involve the development of residential and associated amenity uses within the Project site, which is currently vacant land. Construction-related activities have the potential to result in impacts to water quality. The grading and construction phases would require the disturbance of surface soils. During the construction period, grading activities would result in exposure of soil to stormwater runoff, potentially causing erosion and sedimentation in runoff. Sediments also transport substances such as nutrients, hydrocarbons, and trace metals, which would be conveyed to the storm drain facilities and receiving waters. Substances such as fuels, oil and grease, solvents, paints and other building construction materials, wash water, and dust control water could also enter stormwater runoff and be transported to nearby waterways. This could potentially degrade the quality of the receiving waters and potentially result in the impairment of downstream water sources.

Construction activities for the proposed Project would occur over an area more than one acre. Therefore, the proposed Project is required to obtain coverage under a NPDES permit. Construction impacts resulting from the proposed Project would be minimized through compliance with the applicable NPDES Construction General Permit. As part of compliance with the NPDES requirements, a Notice of Intent (NOI) would be prepared and submitted to the SWRCB, and a Water Discharge Identification Number would be obtained prior to grading. This would provide notification and intent to comply with the State Construction General Permit. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined risk level) and to prepare and implement a SWPPP, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the determined risk level of the construction site, in addition to tracking control, waste management, and site BMPs that control the other potential construction-related pollutants. BMPs may include the use of gravel bags, silt fences, straw wattles, hay bales, check dams, hydroseed, or soil binders. The construction contractor would be required to operate and maintain these BMPs throughout the duration of on-site construction activities. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. In addition, the construction contractor would be required to maintain an inspection log and have the log on site to be reviewed by the City and representatives of the RWQCB. The construction-phase BMPs would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, hydrocarbons, and trace metals).

Mandatory compliance with regulatory requirements for the protection of water quality during construction, including implementation of a SWPPP, would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Post-Development Water Quality Impacts

Stormwater pollutants that may be produced during operation of the proposed Project include bacterial indicators, nutrients, pesticides, sediments, trash/debris, and oil/grease. The Tequesquite Arroyo (Sycamore Creek) and Santa River Reach 3 are receiving waters for stormwater runoff generated within the Project site. As identified above, the Santa Ana River 3 has existing USEPA Section 303(d) List impairments. Therefore, potential waterborne pollutants generated by the proposed Project could contribute to existing Section 303(d) impairments of downstream receiving waters and thus could potentially be considered "pollutants of concern."

Under the NPDES, a Municipal Separate Storm Sewer System (MS4) Permit has been issued to the Riverside County Flood Control and Water Conservation District (RCFC&WCD), the County of Riverside, and co-permittees in the Santa Ana River Basin Region (including the City of Riverside). In compliance with the MS4 Permit, RMC Chapter 14.12 contains the City's regulations for storm water and runoff pollution control, which prohibit specific types of discharges into the storm drainage system and require the implementation of construction and post-construction BMPs. A Preliminary WQMP has been prepared for the proposed Project and included in Technical Appendix I1 of this Initial Study. The Preliminary WQMP identifies water quality BMPs that would be constructed, maintained, and implemented on site to reduce pollutants in the storm water.

As shown on the Preliminary WQMP site plan provided on Figure 22, MWS would be used for the stormwater treatment. A detention facility consisting of a solid-walled CMP would also be installed and stormwater would be released at a rate matching the existing conditions flow rate into the storm drain system. A trash screen would be installed at the on-site junction structure located just upstream of the discharge point into the storm drain system. Stormwater flows exceeding the treatment volume capacity would bypass the treatment system and continue through the private storm drain system, where it would confluence with the existing catch basin on Gateway Drive.

The proposed project would also comply with RMC Chapter 14.12 of the RMC, which sets storm water discharge prohibitions and regulations to reduce pollutants in the storm water, including requirements for swimming pool discharge and waste discharges into the City's sewer system. In addition, non-structural BMPs are outlined in the Preliminary WQMP. Permanent structural BMPs in the WQMP shall be constructed as part of the proposed Project, and non-structural BMPs shall be implemented during long-term use and occupancy of the proposed Project as outlined in the Preliminary WQMP.

With compliance with the MS4 Permit, NPDES Construction General Permit, and the City's storm water regulations through implementation of the SWPPP and WQMP, the proposed Project would result in a **less than significant** impact directly, indirectly, and cumulatively as it relates to any water quality standard or waste discharge.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

10b. Response: ***(Source: General Plan 2025 Figure PF 1.1 – Water Basins Groundwater Recharge Areas*** (City of Riverside, 2007a)***; Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Multi-Family Residential Development Independence at Canyon Springs prepared by LOR Geotechnical Group, Inc., dated April 2025*** (LOR Geotechnical Group, 2025) ***[Technical Appendix F]; and Preliminary Hydrology-Hydraulics Study, prepared by KHR Associates, dated January 19, 2026*** (KHR Associates, 2026b) ***[Technical Appendix I2])***

Less than Significant Impact. The Project site is underlain by the San Bernardino Basin Area of the San Jacinto Groundwater Basin. Groundwater was encountered at approximately 48.5 feet bgs within the deepest exploratory soil boring at the Project site, which was advanced to a maximum depth of approximately 51.5 feet bgs. Potable water would be provided to the proposed uses by the EMWD. The proposed Project does not include the use of any wells or other groundwater extraction activities. Therefore, the proposed Project would not directly draw water from the groundwater table. Accordingly, implementation of the proposed Project has no potential to substantially deplete or decrease groundwater supplies.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The Project site is currently vacant; therefore, with implementation of the proposed Project there would be a decrease in the amount of pervious surface. However, the results of the Project-specific Geotechnical Investigation (Technical Appendix F of this Initial Study), which included percolation testing, indicate that the Project site soil materials are not conducive to infiltration. Therefore, there is a low rate of infiltration under existing conditions. Therefore, with implementation of the proposed Project, the local groundwater levels would not be adversely affected. Therefore, the proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed Project may impede sustainable groundwater management of the basin. This impact would be **less than significant** directly, indirectly, and cumulatively.				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on-or-off-site?	☐	☐	☒	☐
10i Response: ***(Source: Project-Specific Water Quality Management Plan, prepared by KHR Associates, dated January 2026*** (KHR Associates, 2026a) ***[Technical Appendix I1]); and Preliminary Hydrology-Hydraulics Study, prepared by KHR Associates, dated January 2026*** (KHR Associates, 2026b) ***[Technical Appendix I2])*** **Less Than Significant Impact.** There are no streams or rivers within or near the Project site. With respect to erosion and siltation and polluted runoff, as described above under Response 10a, because the proposed Project would implement short- and long-term water quality controls (i.e., BMPs) consistent with applicable regulatory requirements, the proposed Project would not result in substantial erosion or siltation on or off site during both construction and operation or provide substantial additional sources of polluted runoff. This impact would be **less than significant** directly, indirectly, and cumulatively.				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	☐	☐	☒	☐
10ii Response: ***(Source: Project-Specific Water Quality Management Plan, prepared by KHR Associates, dated January 19, 2026*** (KHR Associates, 2026a) ***[Technical Appendix I1]); and Preliminary Hydrology-Hydraulics Study, prepared by KHR Associates, dated January 19, 2026*** (KHR Associates, 2026b) ***[Technical Appendix I2])*** **Less Than Significant Impact.** As presented in the Preliminary Hydrology-Hydraulics Study (Hydrology Study) prepared for the proposed Project and included in Technical Appendix I2 of this Initial Study, under existing conditions, stormwater runoff from the Project site gradually flows southwesterly without stormwater treatment, where it eventually gets collected by an existing catch basin on the southwest corner of the Project site connected to an existing storm drainage system. Figure 31 depicts the pre-development hydrology map. Local storm drain facilities have been designed to conform to RCFC & WCD requirements. Storm drain facilities have been designed to accommodate both the 10-year and 100-year storm events assuming development of the Project site with non-residential uses consistent with the existing CSBP Specific Plan. Under pre-development conditions, the Project site contributes 3.64 cubic feet per second (cfs) for a 1-year storm event, 5.26 cfs for a 2-year storm event, 9.41 cfs for a 10-year storm event, and 15.36 cfs for 100-year storm event. The proposed Project would have a net increase in total impervious area compared to the existing condition of the site, increasing the site's overall total imperviousness percentage to 80 percent and decreasing the pervious area to 20 percent. Under the post-development conditions, the Project site would produce 8.81 cfs for a 1-year storm event, 11.64 cfs for a 2-year storm event, 18.47 cfs for a 10-year storm event, and 27.91 cfs for a 100-year storm event. Stormwater runoff from the proposed buildings would be collected by multiple roof drains, inlets, and catch basins, which would connect to the proposed on-site storm drain system. Surface area runoff would flow along the proposed curb and gutters, and would be collected by				

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
multiple catch basins distributed throughout the Project site. All stormwater runoff would be routed for pre-treatment, prior to detention, and would be discharged via a proposed 24-inch storm drain pipe, connecting to the existing catch basin and replacing a portion of the existing 21-inch RCP storm drain pipe in Gateway Drive. A portion of the existing 21-inch RCP storm drain pipe would be replaced to meet the invert requirements of the on-site storm drain lines. Pre-detention for stormwater quality design volume is required to reduce the runoff volume discharging into the existing public storm drain system to match the pre-developed conditions. As shown on Figure 32, which shows the post-development hydrology map, a detention facility would be installed and stormwater would be released at a rate matching the existing conditions flow rate into the storm drain system. The proposed underground detention system is adequately sized to detain the post-development runoff volume and match the pre-development conditions. Therefore, the proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site. This impact would be **less than significant** directly, indirectly, and cumulatively.				
iii. 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; or	☐	☐	☒	☐
10iii Response: (Source: *Preliminary Hydrology-Hydraulics Study, prepared by KHR Associates, dated January 2026* (KHR Associates, 2026b) ***[Technical Appendix I2])*** **Less Than Significant Impact.** As identified in the Hydrology Study included in Technical Appendix I2 of this Initial Study, the City-owned catch basin on southwest corner of the Project site connects to a westerly flowing existing 21-inch RCP storm drain in Gateway Drive, which increases in size to a 48-inch RCP storm drain, 72-inch RCP storm drain, 96-inch RCP storm drain and 120-inch concrete pipe, ultimately discharging into the Tequesquite Arroyo. The existing 21-inch RCP in Gateway Drive is designed to accommodate non-residential development at the Project site, consistent with the current land use designation in the CSBP Specific Plan. According to the results of the Hydrology Study, the proposed underground detention system is adequately sized to detain the post-development runoff volume and match the pre-development conditions. Therefore, the proposed Project would not create or contribute runoff that would exceed the capacity of any existing or planned stormwater drainage system. With respect to erosion and siltation and polluted runoff, as described above under Response 10a above, because the proposed Project would implement short- and long-term water quality controls (i.e., BMPs) consistent with applicable regulatory requirements, the proposed Project would not result in substantial erosion or siltation on or off site during both construction and operation or provide substantial additional sources of polluted runoff. Therefore, the proposed Project would 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. This impact would be **less than significant** directly, indirectly, and cumulatively.				
iv. Impede or redirect flood flows?	☐	☐	☐	☒
10iv. Response: (Source: *Preliminary Hydrology-Hydraulics Study, prepared by KHR Associates, dated January 2026* (KHR Associates, 2026b) ***[Technical Appendix I2])*** **No Impact**. As shown on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06065C0745G (effective date August 28, 2007), the Project site is located within "Flood Zone X (unshaded)" which corresponds with areas of minimal flood hazard (i.e., outside the 1 percent and 0.2 percent annual chance floodplains). Accordingly, development on the Project site would have no potential to place housing, or other structures, within a 100-year floodplain or impede or redirect flood flows within a 100-year floodplain. **No impact** would occur directly, indirectly, and cumulatively.				

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

10d. Response: ***(Source: General Plan 2021-2029 Public Safety Element Technical Background Report Figure CP-4 – Flood Hazard Areas*** (City of Riverside, 2021b)***)***

No Impact. The Pacific Ocean is located more than 40 miles southwest of the Project site; consequently, there is no potential for the Project site to be impacted by a tsunami because tsunamis typically can only reach up to a few miles inland. Additionally, the Project site is not subject to a flood hazard or seiche zone because the nearest large bodies of surface water are approximately 7.1 miles southeast of the Project site (Lake Perris) and approximately 9.7 miles southwest of the Project site (Lake Mathews), respectively, both of which are too far away from the subject property to impact the property with a flood hazard or seiche. Accordingly, the proposed Project would not risk release of pollutants due to inundation. **No impact** would occur directly, indirectly, and cumulatively.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

10e. Response: ***(Source: Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan*** (RWQCB 2019)***; and Groundwater Sustainability Plan for the San Jacinto Groundwater Basin*** (EMWD, 2021b)***)***

Less than Significant Impact. As previously discussed, the Project site is located within the Santa Ana River Basin and Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Plan by preparing and adhering to a SWPPP and WQMP.

Under the Sustainable Groundwater Management Act (SGMA) passed in 2014 (California Water Code Section 10729[d]), each high and medium priority basin, as identified by the California Department of Water Resources, is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (GSP). The Project site is underlain by the 248-square-mile San Jacinto Groundwater Basin (SJGB). Approximately 39 percent of the SJGB, including the area underlying the Project site is adjudicated. The adjudicated portion of the SJGB applicable to the proposed Project is the approximately 4.4-square-mile San Bernardino Basin Area, where groundwater was adjudicated in 1969. The SGMA does not apply to adjudicated basins (including the San Bernardino Base Area of the SJGB), which are under the jurisdiction of the respective watermasters. Therefore, the proposed Project would not conflict with a GSP.

Implementation of the proposed Project would not conflict with or obstruct the Santa Ana River Basin Water Quality Control Plan or a GSP. Therefore, this impact would be **less than significant** directly, indirectly, and cumulatively.

11. LAND USE AND PLANNING Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒

11a. Response: ***(Source: GoogleEarth; and the proposed CSBP Specific Plan Amendment)***

No Impact. Development of the Project site would not physically disrupt or divide the arrangement of an established community. The properties to the south and east of the Project site are separated from the Project site by Gateway Drive and Canyon Park Drive, and the property to the west of the Project is developed with an office building. The property to the north of the Project site is currently undeveloped; however, development of this land is planned for development with non-residential uses pursuant to the Canyon Springs Healthcare Campus Specific Plan and the CSBP Specific Plan. The proposed Project, which was planned for development with non-residential uses under the existing CSBP Specific Plan, would be served by fully improved public streets and utility infrastructure and does not involve the subdivision of land or the creation of streets that could alter the existing surrounding pattern of development or an established community. Therefore, the

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
proposed Project would not physically dividing an established community. There would be **no impact** directly, indirectly, and cumulatively.				
b. 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?	☐	☐	☒	☐

11b. Response: ***(Source: General Plan 2025 Land Use and Urban Design Element Figure LU-10 – Land Use Policy Map, and Table LU-5 – Zoning/General Plan Consistency Matrix*** (City of Riverside, 2007a)***; and RMC Chapter 19.220 - Specific Plan Overlay Zone (SP) and Chapter 19.820 - Specific Plan/Specific Plan Text)***

Less Than Significant Impact.

Regional Planning Programs

With respect to regional planning, SCAG is the MPO for Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial Counties. The federal government mandates SCAG, as the designated MPO, to prepare plans for growth management, transportation, air quality, and hazardous waste management. In addition, SCAG reviews EIRs for projects of regional significance for consistency with its regional plans. The policies and strategies of SCAG's regional planning programs, including the 2024-2050 RTP/SCS (Connect SoCal 2024), are not applicable to the proposed Project because the proposed Project is not of statewide, regional, or areawide significance based on the established criteria in Section 15206 of the CEQA Guidelines, which are applied by SCAG to determine regional significance. Residential projects with more than 500 units are considered regionally significant. The proposed Project would involve the development of 156 residential units and associated resident amenities. Therefore, the proposed Project would not be considered regionally significant.

The proposed Project's consistency with regional plans and programs that address specific topical issues are discussed in the respective sections of this Initial Study. This includes, but is not limited to, the SCAQMD AQMP (Air Quality section), the Western Riverside County MSHCP (Biological Resources section), the MARB/IP ALUCP (Hazards and Hazards Materials section), the Santa Ana River Basin Water Quality Control Plan (Hydrology and Water Quality section), energy plans and regulations (Energy section) and GHG reduction plans (Greenhouse Gas Emissions section). As indicated in the analysis presented in this Initial Study, the proposed Project would be consistent with the requirements outlined in these regional plans, including requirements in place to avoid or mitigate environmental effects.

City of Riverside

The Project site is designated as C - Commercial in the City's Land Use Policy Map (General Plan 2025 Figure LU-10). The Commercial designation allows retail, sales, service, and office uses. A General Plan Amendment is needed to amend the site's land use designation to MU-U - Mixed Use – Urban, which provides opportunities for primarily high-density residential development with commercial, office, institutional and business uses emphasizing retail, entertainment and student-oriented activities. Such development is intended to facilitate the grouping of innovative housing options with employment uses, entertainment activities and public gathering spaces and other community amenities. The Project site is located within the CSBP Specific Plan area, which allows for the development of residential and non-residential uses, and adjacent to areas within the Canyon Springs Healthcare Specific Plan planned for development with hospital, medical service facilities, senior housing, independent living facility, assisted living facility, skilled nursing facility, and supporting uses. The proposed General Plan Amendment to MU-U - Mixed Use – Urban would not conflict with adjacent land use designations in the City's Land Use Policy Map, which allow for the development of commercial uses, and uses allowed by the Canyon Springs Healthcare Campus Specific Plan.

The Riverside General Plan identifies objectives and policies that build upon the vision for the City outlined in the General Plan and provide the structure for each of the General Plan's elements. The State's General Plan Guidelines provide that "an action, program, or project is consistent with the General Plan if, considering all its aspects, it would further the objectives and policies of the General Plan and not obstruct their attainment" (OPR, 2017). A detailed assessment of the proposed

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Project's consistency with applicable objectives and policies from the Riverside General Plan is provided in Appendix A of this Initial Study, which demonstrates that the proposed Project is consistent with the applicable objectives and policies. The City's Zoning Ordinance is within RMC Title 19 and establishes specific standards for the use and development of all properties within the City by regulating land uses, development intensity, including limits of building setbacks, landscaping standards, and building heights. The CSBP Specific Plan has been prepared pursuant to the provisions of the California Government Code, Title 7, Division 1, Chapter 3, Article 8, Sections 65450 through 65457. The law allows adoption of specific plans as may be required for the implementation of the General Plan. RMC Chapter 19.220, Specific Plan Overlay Zone (SP), is established to implement California Government Code Sections 65450 through 65457. For those properties where the Specific Plan Overlay Zone is applied, all permitted use restrictions, development standards, and other applicable standards or regulations governing development as contained within the adopted specific plan shall apply. To the extent that the specific plan does not enumerate use restrictions, development standards, or other applicable regulations, the standards associated with the underlying base zone shall apply. In the event that provisions of the adopted specific plan conflict with or do not correspond with the provisions of the underlying base zone, the provisions as contained in the adopted specific plan shall apply and supersede the underlying base zone requirements. RMC Chapter 19.820, Specific Plan/Specific Plan Text, Map Amendments identifies the procedures for the processing of specific plans in the City. As previously discussed, the proposed Project includes a General Plan Amendment to amend the General Plan Land Use Designation from C – Commercial to MU-U – Mixed-Use – Urban; Zoning Code Map Amendment to rezone the property from O – Office to MU-U – Mixed-Use – Urban (see Figure 24 and Figure 25); and a Specific Plan Amendment to amend the Canyon Springs Business Park Specific Plan to create the Mixed-Use – Urban Zone within the Specific Plan and add Section 3.9, Planning Area 8B: Mixed-Use Urban to outline requirements for development of the Project site (PA 8B). MU-U Mixed Use-Urban is an existing land use in the CSBP Specific Plan (for Planning Area 1). The application of the proposed CSBP Specific Plan amendment would allow for development within the Project site (PA 8B) to be implemented in accordance with the proposed CSBP Specific Plan amendment, which would constitute the zoning regulations applicable to the Project site. Once adopted, the proposed CSBP Specific Plan amendment would supplement and supersede the City's zoning regulations for Project site. The proposed Project has been designed to comply with applicable development standards and regulations in the proposed CSBP Specific Plan amendment. In summary, based on the preceding analysis, the proposed Project would not 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. This impact would be **less than significant** directly, indirectly, and cumulatively.				
12. MINERAL RESOURCES Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
12a. Response: ***(Source: General Plan 2025 FPEIR Figure 5.10-1 – Mineral Resources*** (City of Riverside, 2007b)***)*** **No Impact.** As shown on General Plan 2025 FPEIR Figure 5.10-1, Mineral Resources, the Project site is located in mineral resource zone (MRZ)-4. The MRZ-4 designation indicates there is insufficient data to assign any other MRZ designation. The Project site is undeveloped and no mining or mineral extraction activities occur at the Project site or in the surrounding area. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, **no impact** would occur directly, indirectly, and cumulatively.				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

12b. Response: ***(Source: General Plan 2025 Open Space and Conservation Element*** (City of Riverside, 2007a)***; and General Plan 2025 FPEIR Figure 5.10-1 – Mineral Resources*** (City of Riverside, 2007b)***)***

No Impact. Review of the General Plan 2025 FPEIR Figure 5.10-1, Mineral Resources, indicates there are no mineral resource recovery sites delineated within the City of Riverside. Additionally, as described above in Response 12a, the Project site is not located within MRZ-2 or MRZ-3 areas and implementation of the proposed Project would not result in mineral resource losses. As such, implementation of the proposed Project would have **no impact** on locally-important mineral resources recovery sites directly, indirectly, and cumulatively.

13. NOISE Would the project result in:				
a. 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?	☐	☐	☒	☐

13a. Response: ***(Source: Independence at Canyon Springs Noise and Vibration Analysis, prepared by Urban Crossroads, dated March 2026*** (UXR, 2026e) ***[Technical Appendix J]; and RMC Section 7.25.010(A) - Exterior sound level limits)***

Less Than Significant Impact. Following is a summary of the noise analysis provided in the Independence at Canyon Springs Noise and Vibration Analysis (Noise Analysis) included in Technical Appendix J of this Initial Study. The Noise Analysis also includes a detailed discussion of the fundamentals of noise and the regulatory setting. To assess the existing noise level environment, 24-hour noise level measurements were taken at three locations in the vicinity of the Project site on April 3, 2025. Exhibit 5-1 of the Noise Analysis presents the noise level measurement locations and Table 5-1 of the Noise Analysis presents the noise measurement results. Noise impacts resulting from the proposed Project would be considered significant if any of the significance criteria in Table 4-1 of the Noise Analysis are exceeded. Following is a summary of the construction-related and operational noise impact analysis results for the proposed Project.

Construction Noise Impact Analysis

Construction activities associated with the proposed Project are expected to occur in the following stages: site preparation and grading, foundation, on-site wet and dry utilities, curb and gutter and paving, and framing and architectural coating (building construction). These activities would create temporary periods of noise when heavy construction equipment is in operation and would cause a short-term increase in ambient noise levels. However, construction equipment noise would not be constant because of the variations of power, cycles, and equipment location.

As discussed in Section 3.4 of the Noise Analysis, the City limits the hours of construction activities. However, the City has not established an acceptable construction source noise level limit at potentially affected receivers. Similarly, the City has not adopted a noise level increase limit for construction sources. In the absence of a formally adopted threshold of significance for construction noise, lead agencies may elect to utilize relevant thresholds of significance established by other agencies. For purposes of this analysis, the *City of Los Angeles Construction Noise and Vibration Update to Thresholds and Methodology* (LA Construction Thresholds Update) adopted in 2024 is used and is further described in the Section 4.1.3 of the Noise Analysis included in Appendix J of this Initial Study. The LA Construction Thresholds Update was developed based on input from technical experts, including a Technical Advisory Committee consisting of noise consultants and experts with decades of experience in preparing noise studies, included a public process and review of noise thresholds used by other state and local agencies, and is supported by substantial evidence. The LA Construction Thresholds Update uses a two-part threshold: the relative increase and the absolute noise level limit.

For the relative increase over ambient, the LA Construction Thresholds Update states that, “for construction activities that occur between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays, there is

no numerical threshold above ambient noise levels." This is supported by various factors such as ambient noise levels are higher during daytime hours, daytime construction activities are temporary and periodic, and daytime activities are not expected to result in sleep disruption For the absolute noise level limit threshold, the LA Construction Thresholds Update states that, "on- and off-site construction noise during daytime hours (7:00 a.m. and 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays) are limited to a maximum 80 dBA Leq(8-hour) absolute threshold at sensitive uses (at the property line or at the exterior of the building), including outdoor public recreational areas owned or maintained by a public agency. This standard does not apply to private residential balconies, which may or may not extend past the exterior of a building, or to private residential recreational areas." The LA Construction Thresholds Update also includes nighttime construction noise level thresholds, with an exemption for mat pour activities and other types of concrete pour that require an extended continuous pour beyond the allowable construction hours of less than five days. However, the proposed Project is not anticipated to have non-exempt nighttime construction activities, and, as such, analysis of nighttime construction activities is not necessary. Therefore, for purposes of this analysis, there is no applicable noise level increase limit for the daytime construction hours allowed by the City of Riverside pursuant to RMC Section 7.35.020 (G); however, if the proposed Project-related construction generates a temporary noise level exceeding 80 dBA Leq at a noise-sensitive receiver then the proposed Project construction noise levels would be considered a significant impact.

As described in the Noise Analysis, using reference construction equipment noise levels from the Federal Highway Administration (FHWA), which published the Roadway Construction Noise Model (RCNM), and the CadnaA noise prediction model, calculations of the proposed Project construction noise level impacts by phase at the nearby sensitive receiver locations were completed and are summarized in Table 5. Receptor locations are illustrated on Figure 33. The modeled noise-sensitive receiver locations include Edgemont Elementary School and existing homes in the Project vicinity which are representative of existing sensitive receptors nearest the Project site. It is not necessary to model every single receiver location surrounding the Project's construction area because receivers located at a similar distance from Project-related construction activities with similar ground elevations, orientation, and intervening physical conditions as the three modeled receptor locations would experience similar noise effects as those described herein.

As shown in Table 5, the construction noise levels are expected to range from 49.4 to 56.3 dBA Leq at the nearby receiver locations. To evaluate whether the proposed Project would generate potentially significant short-term noise levels at the nearest receiver locations, a construction-related daytime noise level threshold of 80 dBA Leq is used as a reasonable threshold to assess the daytime construction noise level impacts. The construction noise analysis shows that the nearest receiver locations would not exceed the reasonable daytime 80 dBA Leq significance threshold during Project construction activities. Therefore, the noise impacts due to the Project construction noise are considered less than significant at these receiver locations.

Table 5 Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	53.3	52.6	50.4	47.2	49.1	53.3
R2	56.3	55.6	53.4	50.2	52.1	56.3
R3	49.4	48.7	46.5	43.3	45.2	49.4

[1] Construction noise source and receiver locations are shown in Figure 33.

[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 11.1 of the Noise Analysis (Technical Appendix J).

Source: (UXR, 2026e)

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Operational Noise Impact Analysis

This operational noise analysis is intended to describe noise level impacts associated with the expected typical residential activities at the Project site. The operational noise sources of concern would be the ground mounted air conditioning units associated with each dwelling unit, which are shown on Figure 34 and evaluated against standards established in the RMC Section 7.25.010(A), and the relative increase in noise levels at each existing sensitive receiver. As described in the Noise Analysis, to estimate the potential operational noise impacts resulting from the proposed Project, reference noise level measurements were collected from similar types of activities or equipment to represent the noise levels expected with the development of the Project. To demonstrate compliance with local noise regulations, the unmitigated Project-only operational noise levels are evaluated against exterior noise level thresholds based on the City of Riverside exterior noise level standards at nearby receiver locations. Table 6 shows that the unmitigated operational noise levels associated with the proposed Project would not exceed the City of Riverside daytime and nighttime exterior noise level standards at the existing nearby noise-sensitive receiver locations. Therefore, the unmitigated operational noise impacts are considered **less than significant** at the nearby noise-sensitive receiver locations.

Table 6 Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	22.1	19.3	55.0	45.0	No	No
R2	26.0	23.2	55.0	45.0	No	No
R3	18.9	16.2	55.0	45.0	No	No

[1] See Figure 33 for the receiver locations.

[2] Proposed Project unmitigated operational noise levels.

[3] Exterior noise level standards, as shown in Table 4-1 of the Noise Analysis (Technical Appendix J of this Initial Study).

[4] Do the estimated Project operational noise source activities exceed the noise level standards?

"Daytime" = 7:00 a.m. - 10:00 p.m.; "Nighttime" = 10:00 p.m. - 7:00 a.m.

Source: (UXR, 2026e)

Table 7 Daytime Project Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	22.1	L1	67.4	67.4	0.0	1.5	No
R2	26.0	L2	57.1	57.1	0.0	5.0	No
R3	18.9	L3	67.3	67.3	0.0	1.5	No

[1] See Figure 33 of this Initial Study for the receiver locations.

[2] Total Project daytime operational noise levels as shown in Table 6.

[3] Reference noise level measurement locations as shown in Exhibit 5-A of the Noise Analysis (Technical Appendix J of this Initial Study).

[4] Observed daytime ambient noise levels as shown in Table 5-1 of the Noise Analysis (Technical Appendix J of this Initial Study).

[5] Represents the combined ambient conditions plus the proposed Project activities.

[6] The noise level increase expected with the addition of the proposed Project activities.

[7] Significance increase criteria as shown in Table 4-1 of the Noise Analysis (Technical Appendix J of this Initial Study).

Source: (UXR, 2026e)

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

To describe the operational noise level increases, the operational noise levels resulting from proposed Project operations are combined with the existing ambient noise level measurements for the nearby receiver locations that may be potentially impacted by proposed Project's operational noise sources. The difference between the combined proposed Project and ambient noise levels describes the proposed Project's noise level increases to the existing ambient noise environment. As indicated in Table 7, the proposed Project would generate daytime operational noise increases of up to 0.0 dBA L_{eq} at the nearest receiver locations. Table 8 shows that the Project would generate nighttime operational noise level increases of up to 0.0 dBA L_{eq} at the nearest receiver locations. Therefore, operational noise level increases resulting from the proposed Project would not exceed the operational noise level increase significance criteria presented in Table 4-1 of the Noise Analysis (Technical Appendix J). Therefore, proposed Project-related operational noise level increases at the sensitive receiver locations would be **less than significant**.

Table 8 Nighttime Operational Noise Level Increases

Receiver Location[1]	Total Project Operational Noise Level[2]	Measurement Location[3]	Reference Ambient Noise Levels[4]	Combined Project and Ambient[5]	Project Increase[6]	Increase Criteria[7]	Increase Criteria Exceeded?
R1	19.3	L1	61.4	61.4	0.0	5.0	No
R2	23.2	L2	48.3	48.3	0.0	5.0	No
R3	16.2	L3	61.2	61.2	0.0	5.0	No

[1] See Figure 33 of this Initial Study for the receiver locations.

[2] Total Project daytime operational noise levels as shown in Table 6.

[3] Reference noise level measurement locations as shown in Exhibit 5-A of the Noise Analysis (Technical Appendix J of this Initial Study).

[4] Observed daytime ambient noise levels as shown in Table 5-1 of the Noise Analysis (Technical Appendix J of this Initial Study).

[5] Represents the combined ambient conditions plus the proposed Project activities.

[6] The noise level increase expected with the addition of the proposed Project activities.

[7] Significance increase criteria as shown in Table 4-1 of the Noise Analysis (Technical Appendix J of this Initial Study).

Source: (UXR, 2026e)

With respect to off-site transportation noise impacts resulting from the proposed Project, the proposed Project is anticipated to generate a maximum of 1,025 daily vehicle trips. Canyon Park Drive has approximately 3,110 daily vehicle trips, and Gateway Drive has approximately 3,970 daily vehicle trips based on counts collected in 2024. The increase in daily traffic volumes would result in an approximate 1.2 dBA CNEL increase, which is not expected to be a perceptible noise level increase (i.e., less than 3 dBA CNEL) on nearby roadways, Canyon Park Drive, and Gateway Drive. Furthermore, there are no sensitive land uses along Canyon Park Drive or Gateway Drive near the Project site, and the nearest noise-sensitive uses, including the Edgemont Elementary School, are adjacent to roads that are not expected to receive a significant amount of Project-related traffic. Therefore, due to the low traffic volumes generated by the proposed Project, and non-sensitive uses along Canyon Park Drive and Gateway Drive, the off-site traffic noise levels generated by the proposed Project would be less than significant.

Based on the preceding analysis, the proposed Project would not generate 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. This impact would be **less than significant** directly, indirectly, and cumulatively.

b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

13b. Response: ***(Source: Independence at Canyon Springs Noise and Vibration Analysis, prepared by Urban Crossroads, dated March 2026*** (UXR, 2026e) ***[Technical Appendix J])***

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Less Than Significant Impact. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. As described in the Noise Analysis included in Technical Appendix J of this Initial Study, using the vibration source level of construction equipment and the construction vibration assessment methodology published by the FTA, it is possible to estimate the proposed Project's vibration impacts. Table 9 presents the expected proposed Project-related vibration levels at the nearby receiver locations. At distances ranging from 739 to 1,833 feet from Project construction activities, construction vibration velocity levels are estimated to be less than 0.1 to 0.01 peak particulate velocity (PPV) inches per second (in/sec). Based on the maximum acceptable continuous vibration threshold of 0.50 PPV (in/sec), the typical proposed Project construction vibration levels would not exceed the vibration thresholds at nearby sensitive receivers. Therefore, the proposed Project-related vibration impacts would **less than significant** directly, indirectly, and cumulatively during typical construction activities at the Project site.

Table 9 Project Construction Vibration Levels – Unmitigated

Location[1]	Distance to Construction Activity (feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]						Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Vibratory Roller	Highest Vibration Level		
R1	1,143'	0.00	0.00	0.00	0.00	0.00	0.00	0.50	No
R2	739'	0.00	0.00	0.00	0.00	0.01	0.01	0.50	No
R3	1,833'	0.00	0.00	0.00	0.00	0.00	0.00	0.50	No

[1] Construction noise source and receiver locations are shown in Figure 33 of this Initial Study.
[2] Distance from receiver building facade to Project construction boundary (Project site boundary).
[3] Based on the Vibration Source Levels of Construction Equipment shown in Table 11-4 of the Noise Analysis (Technical Appendix J of this Initial Study).
[4] Caltrans Transportation and Construction Vibration Guidance Manual, April 2020.
[5] Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity
Source: (UXR, 2026e)

c. For a project located within the vicinity of a private airstrip or 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?	☐	☐	☒	☐

13c. Response: ***(Source: Independence at Canyon Springs Noise and Vibration Analysis, prepared by Urban Crossroads, dated March 2026*** (UXR, 2026e) ***[Technical Appendix J])***

Less Than Significant Impact. The closest airport to the Project site is the MARB/IP Airport, located approximately 2.7 miles southeast of the Project site. The Project site is located within the MARB/IP AIA and within Compatibility Zone D - Flight Corridor Buffer, as depicted on Map MA-1 of the MARB/IP ALUCP. MARB/IP ALUCP Table MA-1, Compatibility Zone Factors, indicates that Zone D is considered to have a moderate to low noise impact, and is mostly within or near the 55 dBA CNEL noise level contour boundaries. Consistent with the Basic Compatibility Criteria, listed in MARB/IPA ALUCP Table MA-2, only uses that attract very high concentrations of people in confined areas are discouraged, and there are no restrictions on the development of residential uses. The noise contour boundaries used to determine the potential aircraft-related noise impacts at the Project site are presented on Exhibit 3-3 of the Noise Analysis included in Technical Appendix J of this Initial Study. As shown, the Project site is located outside the 60 dBA CNEL noise level contour boundaries. Therefore, based on the MARB/IP ALUCP Noise Land Use Compatibility Matrix, the Project is considered

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
normally acceptable. Therefore, the proposed Project would not expose people residing or working in the Project area to excessive noise levels. This impact would be **less than significant** directly, indirectly, and cumulatively.				
14. POPULATION AND HOUSING Would the project:				
a. 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)?	☐	☐	☒	☐

14a. Response: ***(Source: General Plan 2025 FPEIR Table 5.12-B – General Plan Population and Employment Projections–2025 and Table 5.12-D - General Plan Housing Projections 2025*** (City of Riverside, 2007b)***; City of Riverside 6th Cycle 2021-2029 Housing Element*** (City of Riverside, 2021c)***; Southern California Association of Governments (SCAG) 2024-2050 RTP/SCS Demographics and Growth Forecast Technical Report*** (SCAG, 2024)***; and Department of Finance (DOF) Table E-5 Population and Housing Estimates - 2011-2017*** (DOF, 2025)***)***

Less Than Significant Impact. The California Department of Finance (DOF) estimates that, as of January 2025, the City of Riverside had a population of 320,337 residents and a housing stock of 102,518 dwelling units. The Project site is currently vacant and the proposed Project would involve the development of 156 residential units and associated resident amenities. Using the City's 2025 average household size of 3.12 persons per dwelling unit, the proposed Project would generate approximately 487 residents in the City. While the Project site was not anticipated to generate residents and housing under the existing General Plan land use designation and zoning, the proposed Project would increase housing opportunities in the City through a variety of housing unit sizes and would provide rental housing options, as well as help meet the City's future housing need for 18,458 new dwelling units under SCAG's 6th Cycle Regional Housing Needs Assessment (RHNA) Allocation Plan and consistent with City efforts to accommodate new residential development, as provided in the City's 2021-2029 Housing Element.

The General Plan 2025 FPEIR indicates that the City is expected to accommodate a typical buildout population ranging from 383,077 to 486,375 residents, and 127,692 to 162,125 housing units within the City and its Sphere of Influence at buildout (2025). Based on the DOF reported existing population information and using the City's lowest projected 2025 population (383,077 residents), the City would have 62,740 additional residents in the City through 2025. The estimated 487 residents associated with the proposed Project represent approximately 0.8 percent of this additional projected population. Based on the DOF reported housing information and using the City's lowest projected 2025 housing unit count (127,692 units), the City would have 25,174 additional housing units in the City through 2025. The proposed 156 residential units associated with the proposed Project represent approximately 0.6 percent of this additional projected housing.

SCAG regional growth projections included in the 2024-2050 RTP/SCS indicate that by 2035 the City of Riverside will have an estimated 126,200 housing units and a population of approximately 362,800 residents (using an average population of 2.88 person per dwelling unit). Based on the DOF reported existing population information and using SCAG's projected 2035 population for the City of Riverside, the City would have 42,463 additional residents in the City through 2035. The estimated 487 residents associated with the proposed Project represent approximately 1.1 percent of this additional projected population. Based on the DOF reported housing information and using SCAG's projected 2035 housing count for the City of Riverside, the City would have 23,682 additional housing units in the City through 2035. The proposed 156 residential units associated with the proposed Project represent approximately 0.7 percent of this additional projected housing.

Therefore, the increase in population and housing that would result from the proposed Project would be well within City and SCAG growth projections. Construction workers at the Project site would be temporary, would be limited in number, and would likely come from the local labor pool. Additionally, the proposed Project would not induce additional growth (i.e., spur new business development in the surrounding area) and would not involve the extension of roads or other infrastructure to unserved areas, which could indirectly induce growth.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Therefore, the proposed Project would not induce substantial unplanned population growth in an area. This impact would be **less than significant** directly, indirectly, and cumulatively.				
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
14b. Response: ***(Source: Google Earth)*** **No Impact.** The proposed Project would not displace existing people or housing, necessitating the construction of replacement housing elsewhere because the Project site is vacant and has no existing housing that would be removed. Therefore, there would be **no impact** on existing people or housing directly, indirectly, and cumulatively.				
15. PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
15a. Response: ***(Source: General Plan 2021-2029 Public Safety Element Technical Background Report*** (City of Riverside, 2021b)***; Riverside Fire Department Operations and Station Information*** (City of Riverside, 2026a); ***and RMC Chapter 16.32 - Fire Prevention and Chapter 16.52 – Development Fees for Fire Stations)*** **Less than Significant Impact.** The City of Riverside Fire Department (RFD) provides fire protection services to the Project site and employs 216 full-time firefighters in 14 strategically located fire stations. The closest fire station to the Project site is Station 13, located at 6490 Sycamore Canyon Boulevard, approximately 0.7-mile west of the Project site. Station 13 is a single engine company station staffing Truck 13. Truck 13 is cross-staffed with Patrol (truck) 13. On duty Station 13 personnel include one captain, one engineer, one firefighter and one firefighter/paramedic. The City has 13 other fire stations that may also serve the project in the event of a fire or other emergency. The RFD average time for service calls is 8 minutes, and RFD has established a performance goal for emergency response to arrive within 8 minutes of dispatch over 90 percent of the time. Because the Project site is currently unoccupied, few to no service calls are made to the site. Occupancy of the proposed 156 residential units and resident amenities would result in approximately 487 new residents. Although the relatively small number of new residents is not anticipated to generate the need for new firefighters and other personnel, the proposed Project would require fire protection services, including administrative tasks associated with approval and construction of the proposed Project (e.g., building plan check) and response to fire service calls once the Project is occupied. The proposed residential uses could increase service calls by the RFD, including structural fires, emergency medical and rescue services, and public education activities. Design and construction of the proposed Project would comply with the California Fire Code Standards, as adopted by the City in RMC Chapter 16.32, Fire Prevention. This includes standards and requirements for smoke and carbon monoxide alarms, fire sprinkler systems, fire escapes, fire exits, access roads, fire extinguishers, and fire hydrants, among other requirements. The proposed Project has been reviewed by the RFD during the Development Review process and would be subject to additional review during the Plan Check process. Proposed Project compliance with City fire protection requirements would reduce the potential for fire and the demand for fire protection services.				

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

The developer would pay development fees for fire stations in accordance with RMC Chapter 16.52. The collected fees are specifically used for the purchase of land and the construction of fire stations and the acquisition of equipment and furnishings to equip the City's fire stations. This ensures that adequate fire facilities and services are available from the RFD. As such, the proposed Project's increase in demand for fire protection services would not require the construction of new or alteration of existing fire protection facilities to maintain an adequate level of fire protection service to the project area. Therefore, no physical impacts associated with the provision of fire protection services would occur.

The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, this impact would be **less than significant** directly, indirectly, and cumulatively.

b. Police protection?	☐	☐	☒	☐

15b. Response: ***(Source: General Plan 2021-2029 Public Safety Element Technical Background Report*** (City of Riverside, 2021b)***; Riverside Police Station Information*** (City of Riverside, 2026b)***)***

Less Than Significant. The Riverside Police Department (RPD) provides law enforcement services to the City of Riverside and the Project site from three police stations. The closest police station to the Project site is the Orange Station (Police Headquarters), located at 4102 Orange Street, approximately 5.9 miles northwest of the Project site. The RPD has 373 sworn police employees and 147 non-sworn employees. RPD sets two essential criteria for patrol response. The first criterion supports police officers' efforts to respond to the most urgent calls from citizens, known as Priority One calls, within 7 minutes of the time calls for service are received. Priority One calls are typically of a life-threatening nature, such as a robbery in progress or an accident involving bodily injury. Officers attempt to respond to Priority Two calls, which are less urgent, within 12 minutes. These types of calls are not life-threatening and include incidences such as past burglary, petty theft, and shoplifting.

Because the Project site is currently unoccupied, few to no service calls are made to the site. Anticipated crime and safety issues during construction of the proposed Project include theft of building materials and construction equipment, malicious mischief, graffiti, and general vandalism. During operation, the proposed Project could create the typical range of police service calls that other similar uses in the City experience. The types of crimes typically associated with residential uses are "crimes against persons," which include, but are not limited to assault, battery, domestic violence, sexual and child abuse, and robberies. Residents and other individuals that would come to the Project site would have to comply with the regulations in the RMC and the California Penal Code, as monitored and enforced by the RPD.

Although the relatively small number of new residents resulting from occupancy of the proposed Project is not anticipated to generate the need for new sworn officers, the proposed Project would require police protection services, including administrative tasks associated with approval and construction of the proposed project (e.g., building plan check) and response to police service calls once the units are occupied. This increase in demand for police protection services would not require the construction of new or alteration of existing Police Department facilities to maintain an adequate level of service to the Project site and the City. Therefore, no physical impacts associated with the provision of police protection services to the proposed Project would occur.

It should also be noted that the City's General Plan encourages the use of Crime Prevention through Environmental Design (CPTED) strategies to reduce the demand for police protection services. The following CPTED principles have been incorporated into the proposed Project to ensure greater security and crime prevention through design:

- doors and windows that look out to Gateway Drive, Canyon Springs Drive, the internal road, and common areas;
- pedestrian-friendly sidewalks;
- nighttime lighting along the internal road, garages, and common areas; and

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

- security fences between buildings and perimeter walls.

The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, this impact would be **less than significant** directly, indirectly, and cumulatively.

c. Schools?	☐	☐	☒	☐

15c. Response: ***(Source: FPEIR Figure 5.13-4 – Other School District Boundaries; Moreno Valley School District School Site Locator*** (MVUSD, 2025)***; California Department of Education, Data Quest*** (CA DOE, 2025)***; Moreno Valley General Plan FEIR*** (Moreno Valley, 2021)***; RMC Chapter 16.56 – School Development Fee)***

Less Than Significant. The proposed Project is located within the Moreno Valley Unified School District (MVUSD) and would be served by the following schools (this capacity is for permanent buildings as relocatable buildings are not counted toward the total capacity):

- **Edgemont Elementary School**, located at 21790 Eucalyptus Avenue, approximately 0.1-mile south of the Project site. This school had a 2025-2026 enrollment of 427 students and capacity for 681 students.
- **Sunnymead Middle School**, located at 23996 Eucalyptus Avenue, approximately 2.0 miles east of the Project site. This school had a 2025-2026 enrollment of 1,206 students and capacity for 1,095 students.
- **Moreno Valley High School**, located at 23300 Cottonwood Avenue, approximately 1.5 miles southeast of the Project site. This school had a 2025-2026 enrollment of 2,098 students and capacity for 2,202 students.

Based on the student generation rate used in the Moreno Valley General Plan, the Project is estimated to generate approximately 114 students (0.73 x 156 residential units) who would attend schools within the MVUSD. The need for additional school facilities and related services is addressed through compliance with payment of required school impact fees. The required fees are collected by school districts at the time of issuance of building permits for commercial, industrial, and residential projects. Therefore, prior to the issuance of the building permit, the project developer would pay the required school development fee to the MVUSD, in accordance with RMC Chapter 16.56. The State Legislature has declared that the payment of school impact fees constitutes full mitigation for the impacts generated by new development, per Section 65995 of the California Government Code. With the payment of required school impact fees, the proposed Project would not result in the need for new or physically altered school facilities and no physical environmental impacts would result.

The proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, this impact would be **less than significant** directly, indirectly, and cumulatively.

d. Parks?	☐	☐	☒	☐

15d. Response: ***(Source: General Plan 2025 Parks and Recreation Element*** (City of Riverside, 2007a)***; City of Riverside Parks, Recreation and Community Services Information*** (City of Riverside, 2026c)***; and Riverside Municipal Code Chapter 16.44 – Regional Parks and Reserve Parks Development Fee, Chapter 16.60 – Local Park Development Fees, and Chapter 16.76 – Trails Development Fee)***

Less Than Significant Impact. The proposed Project would increase the number of residents in the City who may use nearby public parks. As discussed in the Population and Housing Section of this Initial Study, with the development of 156 residential units the proposed Project would generate a population of approximately 487 residents. The City of Riverside's Park System includes almost 3,000 acres of park land, consisting of 49 developed parks, 6 natural or wilderness parks and 7 undeveloped future park sites. The nearest neighborhood park to the Project site is the Sycamore Highlands Park, located at

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

5777 Fair Isle Drive, approximately 1.5 miles northwest of the Project site. This approximately 10.5-acre park has a playground, picnic tables, barbeques, covered picnic area, ballfield, butterfly garden, and water spray feature. Additionally, Sycamore Canyon Wilderness Park is located at 400 Central Avenue, approximately 1.4 miles west of the Project site. This approximately 1,424-acre wilderness reserve has on-site parking and over three miles of bike and hiking trails. These parks would likely be used by residents of the proposed Project, along with other community and City parks, special use parks, open space reserves, County parks, and State parks in the surrounding area and region.

The proposed Project does not include the provision of public parkland; however, private on-site recreational amenities would be provided (i.e., swimming pool and spa, fitness center, barbeque area, dog park, etc.), which would serve to meet some of the demand for recreation facilities generated by residents of the proposed Project. The proposed Project would also provide private open space for each residential unit; the amount of private open space would exceed that required by the proposed CSBP Specific Plan amendment (45,065 sf would be provided compared to the required 7,800 sf).

Based on the established parkland ratio of 3.0 acres per 1,000 residents presented in the General Plan 2025 Parks and Recreation Element, the proposed Project would generate a demand for approximately 1.5 acres of public parkland. Prior to the issuance of building permits, the project developer would comply with RMC Chapter 16.44, Regional Parks and Reserve Parks Development Fee, and RMC Chapter 16.60, Local Park Development Fees, by paying the applicable park development impact fees for use in the acquisition, development, or expansion of regional and local parks in the City. The project developer would also comply with RMC Chapter 16.76, Trails Development Fee, by paying the applicable trail development fee for use in the acquisition and development of trails in the City.

With implementation of City programs to meet the General Plan 2025 parkland standard of 3.0 acres per 1,000 residents, along with the proposed Project's provision of on-site recreational facilities for compliance with existing City regulations and standards for the provision of private and common open space areas, and payment of the applicable Park Development Impact Fee and Trail Development Impact Fee, he proposed Project would not require the development of public parks. Therefore, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. This impact would be **less than significant** directly, indirectly, and cumulatively.

e. Other public facilities?	☐	☐	☒	☐

15e. Response: ***(Source: City of Riverside Parks, Recreation and Community Services Information*** (City of Riverside, 2026c)***; and City Riverside Public Library Information*** (City of Riverside, 2026d)***)***

Less than Significant Impact. The proposed Project would generate a demand for other public facilities, including libraries and community centers. The City has eight libraries that are open to the public, with a library collection of more than 496,000 books, other library materials and resources, and online services. Payment of the library parcel tax by property owners, as approved under Measure C, allows the City to provide adequate funding for library services. The City also has eleven community centers that host a variety of programs, classes, activities, and sports for all ages. Use of these public facilities by the Project residents would not increase the use of existing libraries and community centers to a level that would require the need for new or physically altered facilities.

Therefore, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library or community center facilities, need for new or physically altered library or community center facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. This impact would be **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

16a. Response: ***(Source: Source: City of Riverside Parks, Recreation and Community Services Information*** (City of Riverside, 2026c)***; and Riverside Municipal Code Chapters 16.44, 16.60, and 16.76)***

Less than Significant Impact. Project residents would generate a demand for parks and recreational facilities, as discussed under Response 15d above. Nearby parks that may serve residents of the project include Sycamore Highlands Park and Sycamore Canyon Wilderness Park, along with other City, County, and State parks in the area. The proposed Project would also provide on-site private and common open space areas and recreational facilities in accordance with City standards, including a swimming pool and spa, fitness center, barbeque area, and dog park. In addition, the proposed Project would pay applicable Park Development Impact Fees and Trails Development Fee to the City for use in the acquisition, development or expansion of regional and local parks and trails in the City. Therefore, the potential increase in use of public recreational facilities and participation in recreational programs resulting from the proposed Project would not be at a level that would result in a substantial deterioration of existing facilities; and the impact on parks and recreational facilities would be **less than significant** directly, indirectly, and cumulatively.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

16b. Response: ***(Source: Project Conceptual Site Plan)***

Less than Significant Impact. The proposed Project would include the provision of recreational facilities on site including a swimming pool and spa, fitness center, barbeque area, and dog park. These recreational facilities would serve residents of the proposed Project, and the impacts associated with the construction of these facilities are analyzed in this Initial Study. The proposed Project would also pay applicable Park Development Impact Fees to the City, but no off-site construction or expansion of public parks or recreational facilities would occur directly as part of the Project. Therefore, the proposed Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment beyond that evaluated in this Initial Study. This impact would be **less than significant** directly, indirectly, and cumulatively.

17. TRANSPORTATION Would the project:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐

17a. Response: ***(Source: General Plan 2025 Circulation and Community Mobility Element*** (City of Riverside, 2007a)***; Bicycle Master Plan Update: Addendum*** (City of Riverside, 2012)***; and Independence at Canyon Springs Transportation Impact Analysis, prepared by Fehr & Peers, dated May 2026*** (Fehr & Peers, 2026) ***[Technical Appendix K].***

Less than Significant Impact. Based on review of the General Plan 2025 Circulation and Mobility Element Figure CCM-4, there are no roadways included on the Master Plan of Roadways within or adjacent to the Project site. Based on review of Figure CCM-5 there are no transit facilities within or adjacent to the Project site. Based on review of Figure CCM-6, there are no facilities included on the Master Plan of Trails and Bikeways within or adjacent to the Project site. Further, based on review of the City of Riverside Bicycle Master Plan Update: Addendum there are no planned bicycle facilities within or adjacent to the Project site.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Regional access to the Project site is provided by Interstate (I) 215. Local access to the Project site is provided by Gateway Drive and Canyon Park Drive. Both of these roadways are collector roadways with two lanes in each direction with on-street parking and sidewalks on both sides of the streets. Vehicle access to the Project site would be provided via two driveways, one full-access driveway on Gateway Drive and one exit-only gated driveway on Canyon Park Drive that would also provide emergency vehicle access. Both driveways are proposed to be unsignalized with stop control on the driveway approach. Internal roadways would be constructed and would meet applicable requirements for fire access, emergency access, and trash trucks (e.g., lane width, turning radius) as shown on Figure 16 of this Initial Study.

Sidewalks are also provided along most roadways near the Project Site, where land uses have been developed adjacent to the roadway. Most signalized intersections in the vicinity have marked crosswalks or pedestrian signals. The proposed Project would accommodate pedestrian circulation through a network of internal pedestrian facilities within the Project site as well as through pedestrian sidewalks located along the Project frontage with Canyon Park Drive and Gateway Drive (refer to the pedestrian circulation plan provided on Figure 17 of this Initial Study). Additionally, existing crosswalks at the intersection of Campus Parkway and Canyon Park Drive would be upgraded to continental crosswalks.

There are no existing or planned bicycle facilities adjacent to the Project site; however, there are Class III bike routes along Eucalyptus Avenue between Valley Springs Parkway and Day Street; Class III bike routes are on-street facilities where cyclists share the lane with motor vehicle traffic, designated by signs or pavement markings (sharrows). The proposed Project would include restriping to add a shared 8-foot bike and parking lane along both sides of Gateway Drive, from Day Street to Valley Springs Parkway. Additionally, bicycle racks would be provided on-site to facilitate bicycle travel.

The RTA provides regional bus transit service in western Riverside County. The nearest bus stop to the Project site is approximately 1,000 feet away along Day Street to the east, which services RTA Route 16. RTA Route 16 provides service between UC Riverside and the Moreno Valley Mall, with 15-minute frequencies during weekday peak commute hours and 30-minute frequencies on weekends.

The General Plan outlines objectives and policies to focus future development near existing transportation corridors, ensuring land uses are supported by an efficient local roadway network, embracing innovative solutions to congestion on freeways and regional arterials, supporting alternative modes of transportation such as walking, biking and transit and ensuring that transportation options are maximized for all community members as necessary components of an effective and safe circulation system for Riverside. The State's general rule for a General Plan consistency determination is that "an action, program, or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment" (OPR, 2017). An analysis of the proposed Project's consistency with applicable objectives and policies from the Riverside General Plan, including the Circulation and Mobility Element, is provided in Appendix A of this Initial Study. As demonstrated through this consistency analysis, the proposed Project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact would be **less than significant** directly, indirectly, and cumulatively.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

17b. Response: ***(Source: Independence at Canyon Springs Transportation Impact Analysis, prepared by Fehr & Peers, dated May 2026*** (Fehr & Peers, 2026) ***[Technical Appendix K])***

Less than Significant Impact. SB 743 changed the way transportation impacts are determined according to CEQA. Updates to the State CEQA Guidelines approved in December 2018 included the addition of State CEQA Guidelines Section 15064.3, of which Subdivision b establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric. The City of Riverside adopted Traffic Impact Analysis Guidelines in July 2020. As required, a VMT screening assessment was conducted for the proposed Project to measure the significance of transportation impact related to VMT. The proposed Project's VMT assessment is included in the Transportation Impact Analysis included in Appendix K of this Initial Study.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The City's Traffic Impact Analysis Guidelines and TREDLite (Trip Reduction & the Environmental Dashboard) VMT tool provide a process for projects to be screened from full VMT assessment under the assumption that the project will result in a less than significant transportation impact related to VMT. The TREDLite VMT estimation tool is used to identify if a project is in a low VMT-generating area. TREDLite uses the latest version of WRCOG travel demand model, Riverside County Model (RIVCOM), to evaluate VMT impacts at the Traffic Analysis Zones (TAZ) level. Daily VMT per capita is estimated for each VMT. TAZs that are below the City's adopted threshold of City of Riverside average daily VMT per capita are considered low VMT zones. Projects that are in the TAZ are assumed to result in similar VMT performance and have VMT per capita below the City's threshold. Per results of the TREDLite VMT Estimation tool, the proposed Project is a residential land use type and located in a low VMT-generating area; the TAZ the proposed Project is located in generates 14.3 VMT per capita. The City's adopted threshold of significance is 16.2 VMT per capita. Therefore, the proposed Project is screened from a project-level assessment and assumed to have a less than significant VMT impact. The proposed Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact would be **less than significant** directly, indirectly, and cumulatively.				
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
17c. Response: ***(Source: Project Site Plans)*** **Less than Significant Impact.** Construction traffic resulting from the proposed Project would primarily be associated with construction workers commuting to and from the Project site; delivery of building materials; and transport of construction equipment (including large equipment). Construction workers would travel to the site by passenger vehicle and construction equipment and building materials deliveries would arrive by medium- and heavy-duty trucks. The amount of construction traffic would vary daily depending on the nature of the activity. Construction workers do not typically commute during peak hours as they arrive prior to morning peak hours and leave prior to the evening peak hours. The use of heavy trucks for the transport and disposal of building materials, equipment, and soils would occur periodically throughout the workday but largely outside of peak hours. During construction, trucks traveling to and from the Project site would adhere to applicable regulations associated with truck travel. The design of the proposed Project does not include any geometric design features or incompatible uses that could substantially increase hazards. The proposed Project would involve a residential development consisting of 156 residential units and resident amenities, with an internal circulation system. The types of traffic generated by the proposed residential development would be compatible with the type of vehicles along roadways in the vicinity of the Project site under existing conditions. Vehicle access to the Project site would be provided via two driveways, one full-access driveway on Gateway Drive and one exit-only gated driveway on Canyon Park Drive that would also provide emergency vehicle access. Both driveways are proposed to be unsignalized with stop control on the driveway approach. Internal roadways would constructed and would meet applicable requirements for fire access, emergency access, and trash trucks (e.g., lane width, turning radius) as shown on Figure 16 of this Initial Study. The internal street system, driveways, and street improvements have been designed to meet City Public Works requirements. Implementation of the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be **less than significant** directly, indirectly, and cumulatively.				
d. Result in inadequate emergency access?	☐	☐	☒	☐
17d. Response: ***(Source: Project Site Plans)*** **Less Than Significant.** As discussed under Response 17c, vehicle access to the Project site would be provided via two driveways along one full-access driveway on Gateway Drive and one exit-only gated driveway on Canyon Park Drive that would also provide emergency vehicle access. Both driveways and internal roadways would be constructed to meet				

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
applicable requirements for fire access and emergency access (e.g., lane width, turning radius) as shown on Figure 16 of this Initial Study. Construction materials and equipment would be stored/staged within the Project site and would not interfere with emergency vehicles traveling along roadways adjacent to the Project site. Therefore, the proposed Project would not substantially impede emergency response in the local area. Therefore, the proposed Project would not result in inadequate emergency access and this impact would be **less than significant** directly, indirectly, and cumulatively.				
18. TRIBAL CULTURAL RESOURCES Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
18a. Response: (*Source: Phase I Historical/Archaeological Resources Survey for the Independence at Canyon Springs Project, prepared by CRM Tech, dated August 19, 2025* (CRM Tech, 2025) ***[Technical Appendix D])*** **No Impact.** As discussed under Threshold 5a above, a cultural resources records search and literature review was completed at the SCIC. No historic resources, including tribal cultural resources, are located at the Project site or in the vicinity. Therefore, no impacts on historical resources would occur with implementation of the proposed development at the Project site since no historical structures, sites, or districts are on or near the site that may be affected by the proposed Project. Consultation with local Native American tribes did not result in the identification of any tribal historical resources that may be adversely affected by the proposed Project. As such, the proposed Project would have no impact directly, indirectly, or cumulatively.				
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐
18b. Response: *(Source: Phase I Historical/Archaeological Resources Survey for the Independence at Canyon Springs Project, prepared by CRM Tech, dated August 19, 2025* (CRM Tech, 2025) ***[Technical Appendix D]; and confidential Native American consultation conducted by the City of Riverside)*** **Less than Significant with Mitigation Incorporated.** As previously discussed in the Cultural Resources section of this Initial Study, preparation of the Historical/Archaeological Resources Survey included a cultural resources records search at the SCIC for the Project site and a one-mile radius, a NAHC SLF Search, coordination with local Native American representatives, historical background research, and an intensive-level field survey with the assistance of Native American monitors from the Soboba Band of Luiseño Indians and the Pechanga Band of Indians. The NAHC reported in a letter dated August 19, 2024, that the SLF search yielded negative results for Native American cultural resources in the vicinity of the Project site but noted that the absence of specific information in the SLF would not preclude the presence of such sources. A description of the prehistoric and ethnohistoric context for the Project site is presented in the Historical/Archaeological Resources Survey provided in Technical Appendix D of this Initial Study. A large property of Native American traditional cultural value, designated Site 33-029890 (CA-RIV-13301) in the California Historical Resources Inventory, has been delineated in the Project vicinity on the basis of information provided by the Pechanga Band of Indians, and its boundaries encompasses the entire Project area. Known as the Pechanga Sycamore Hills				

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Traditional Cultural Property, Site 33-029890 is a 25,642-acre cultural landscape lying across the eastern side of the City of Riverside, the western side of the City of Moreno Valley, and the northern side of the City of Perris, to which the Pechanga Band attaches religious and cultural significance. The Historical/Archaeological Resources Survey concludes that Site 33-029890 has little potential to be impacted by the development of the Project site and, as such, requires no further consideration in the planning process for the proposed Project.

Based on the research results presented in the Historical/Archaeological Resources Survey, no archaeological sites or artifacts of prehistoric origin were previously recorded within or adjacent to the Project site. Additionally, no surface manifestation of any prehistoric archaeological remains, or any bedrock outcrops or other natural features that would typically attract prehistoric human use were observed during the field survey. Within the one-mile scope of the records search, five sites of prehistoric (i.e., Native American) origin have been recorded into the California Historical Resources Inventory; four of these consisted of milling slicks on bedrock boulder outcrops. The other one represents the Soboba Sycamore Hills Traditional Cultural Property, essentially the same cultural landscape as Site 33-029890 but with its boundaries delineated based on information from the Soboba Band of Luiseño Indians. Measuring 11,419 acres in total area, Site 33-029890 lies generally to the west of the I-215 corridor, roughly ⅓ mile to ½ mile west of the Project site.

AB 52 (Chapter 532, Statutes of 2014) became effective on July 1, 2015, and created a new category of environmental resources that must be considered under CEQA: tribal cultural resources. The legislation imposes requirements for consultation with California Native American tribes regarding projects that may affect a tribal cultural resource; emphasizes a broad definition of what may be considered to be a tribal cultural resource; and includes a list of recommended mitigation measures. Recognizing that tribes may have expertise regarding their tribal history and practices, AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects proposed within that area. Specifically, AB 52 requires that the lead agency provide project notifications to tribes that request notification in writing prior to the lead agency's release of a Notice of Preparation (NOP) for an EIR, an MND, or Negative Declaration (ND). Once Native American tribes receive a project notification, they have 30 days to respond as to whether they wish to initiate consultation regarding the project and specifically consult regarding mitigation for any potential project impacts to tribal cultural resources. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document.

Further, SB 18 requires local governments to consult with tribes prior to making certain planning decisions, such as general plan updates, specific plans, or designation of open space, and to provide notice to tribes at certain key points in the planning process. These consultation and notice requirements apply to adoption and amendment of both General Plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.).

The City of Riverside is required to consult with interested California Native American tribes regarding the proposed Project pursuant to AB 52. Pursuant to AB 52 the City provided formal notification of the proposed Project to the following Native American tribes on September 19, 2025.

- Gabrieleno Band of Mission Indians – Kizh Nation
- Soboba Band of Luiseno Indians
- Cahuilla Band of Indians
- Pechanga Band of Indians
- Rincon Band of Luiseno Indians
- San Manuel Band of Mission Indians
- Morongo Band of Mission Indians
- Agua Caliente Band of Cahuilla Indians
- San Gabriel Band of Mission Indians

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Because the proposed Project involves a proposed General Plan Amendment and Specific Plan Amendment, the City of Riverside sent notification/consultation letters pursuant to SB 18 to the representatives from the following tribes on the Native American Heritage Commission Tribal Consultation List also on September 19, 2025:

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Indians
- Cabazon Band of Cahuilla Indians
- Cahuilla Band of Indians
- Los Coyotes Band of Cahuilla and Cupeño Indians
- Morongo Band of Mission Indians
- Pala Band of Mission Indians
- Pauma Band of Luiseño Indians
- Pechanga Band of Indians
- Quechan Indian Tribe of the Fort Yuma Reservation
- Ramona Band of Cahuilla Indians
- Rincon Band of Luiseño Indians
- Santa Rosa Band of Cahuilla Indians
- Serrano Nation of Mission Indians
- Soboba Band of Luiseño Indians
- Torres-Martinez Desert Cahuilla Indians
- Yuhaaviatam of San Manuel Nation

Three tribes requested consultation with the City regarding the proposed Project (Agua Caliente Band of Cahuilla Indians, Pechanga Band of Indians, and Soboba Band of Luiseño Indians). A request for consultation was received by the City from the Agua Caliente Band of Cahuilla Indians on September 22, 2025, virtual consultation was conducted on November 6, 2025, and the City received confirmation from the tribe that consultation was complete on September 21, 2026.

A request for consultation was received by the City from the Pechanga Band of Indians on October 24, 2025. Tribal consultation was conducted via a teleconference on December 11, 2025. A request for consultation was received by the City from the Soboba Band of Luiseño Indians on October 21, 2025. Tribal consultation was conducted via a teleconference on November 4, 2025. As a follow up to the consultation, the City provided the Project-specific Historical/Archaeological Resources Survey and the City's standard mitigation measures to both of these tribes on July 17, 2026, and subsequently reached out on July 28, 2026 and August 11, 2026. On August 20, 2026, the City provided both tribes with a deadline for additional consultation or acceptance of the City's standard mitigation by August 27, 2026. The City did not receive written comments or a response and/or input from either tribe on the City's standard mitigation measures. The City sent a letter to both tribes on August 28, 2026, indicating that the City has acted in good faith and a reasonable effort has been made; therefore, allowing the City to move forward with the proposed Project pursuant to Section 21080.3.2 of CEQA.

Based on the results of the Native American Tribal consultation conducted by the City and the Historical/Archaeological Resources Survey, no tribal cultural resources have been identified within the Project site; therefore, the proposed Project would not impact known tribal cultural resources. Notwithstanding, there is a potential to encounter unknown tribal cultural resources during construction, which would be considered a potentially significant impact. Accordingly, mitigation measures MM CUL-1 through MM CUL-4, which are the City's standard mitigation measures sent to the two tribes that requested consultation, are applicable to the proposed Project and identify requirements for archaeological monitoring during ground-disturbing activities, cultural sensitivity training, and actions to be taken if any resources are discovered. With implementation of MM CUL-1 through MM CUL-4, the proposed Project's potential impacts to previously-undiscovered subsurface tribal cultural would be **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Mitigation Refer to MM CUL-1 through MM CUL-4 in the Cultural Resources section of this Initial Study.				
19. UTILITIES AND SERVICE SYSTEMS Would the project:				
a. 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?	☐	☐	☒	☐

19a. Response: ***(Source: Project Utility Plans)***

Less than Significant Impact. As described in the Description of the Project, of this Initial Study, the utility infrastructure necessary to serve the proposed uses are currently available in the roadways adjacent to the Site. On-site utility infrastructure necessary to serve the proposed uses including domestic water, sanitary sewer, drainage, water quality treatment, and dry utilities (e.g., electricity and telecommunications) would be installed as part of the proposed Project and would connect to the existing utility lines. The final sizing and design of on-site facilities would occur during final design.

In summary, domestic water and fire service would be provided to the Project site through lateral connections to the existing EMWD 12-inch water mains located beneath Gateway Drive and Canyon Springs Drive and sewer service would be provided to the Project site through lateral connections to an existing ECSD 8-inch sewer main located beneath Gateway Drive. Electric service would be provided by RPU and the on-site electric infrastructure would connect to the existing circuit at the intersection of Canyon Park Drive and Gateway Drive. On-site telecommunications infrastructure would connect to Frontier facilities along Canyon Park Drive and Charter facilities along Gateway Drive. Stormwater runoff from the proposed buildings would be collected by multiple roof drains, inlets, and catch basins, which would connect to the proposed on-site storm drain system. Surface area runoff would flow along the proposed curb and gutters, and would be collected by multiple catch basins distributed throughout the Project site. All stormwater runoff would be routed for pre-treatment, prior to detention, and would be discharged via a proposed 24-inch storm drain pipe, connecting to the existing catch basin and replacing a portion of the existing 21-inch RCP storm drain pipe in Gateway Drive. A portion of the existing 21-inch RCP storm drain pipe in Gateway Drive would be replaced to meet the invert requirements of the on-site storm drain lines. With respect to WQMP BMPs, MWS would be used for the stormwater treatment. A detention facility consisting of a solid-walled CMP would be installed and stormwater would be released at a rate matching the existing conditions flow rate into the storm drain system.

The installation of utility infrastructure on-site and connections to existing utility infrastructure would be accomplished in conformance with the rules and standards enforced by the applicable service provider. The installation of utility infrastructure required for the proposed Project would result in physical impacts to the environment; however, these impacts are considered to be part of the proposed Project's construction phase and are evaluated throughout this Initial Study accordingly. As identified in the respective sections of this Initial Study, the construction-related impacts resulting from the proposed Project would be less than significant or less than significant with mitigation. Mitigation measures are required to address potential impacts related to biological resources, cultural resources, and tribal cultural resources. The construction of utility infrastructure necessary to serve the proposed Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this Initial Study. Accordingly, additional mitigation measures beyond those identified throughout this IS/MND would not be required. This impact would be **less than significant** directly, indirectly, and cumulatively.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

19b. Response: ***(Source: EMWD 2020 Urban Water Management Plan*** (EMWD, 2021a)***)***

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Less than Significant Impact. The EMWD is responsible for supplying potable water to the Project site and its surrounding area. As discussed in EMWD's 2020 Urban Water Management Plan, adequate water supplies are projected to be available to meet the estimated water demand for the EMWD's service area through at least 2045 under normal, historic single-dry, and historic multiple-dry year conditions (EMWD, 2021a). EMWD forecasts for projected water demand are based on the SCAG population projections, which rely on the adopted land use designations contained within the general plans that cover the geographic area within EMWD's service area. As discussed in the Population and Housing section of this Initial Study, the proposed Project, which include the development of 156 residential units, would be consistent with SCAG's regional growth projections for the City of Riverside.

Further, California PRC Section 21151.9 and Section 10910 et seq. of the Water Code) require that cities and counties prepare a water supply assessment (WSA) for developments of a certain size. In summary, this includes any project with 500 or more residential units; a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area; a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; or a project that would generate demand for an amount of water equivalent to, or greater than, that associated with 500 dwelling units. The proposed Project with 156 units does not require the preparation of a WSA.

As stated above, the EMWD expects to have adequate water supplies to meet all its demands until at least 2045; therefore, the EMWD has sufficient water supplies available to serve the proposed Project from existing entitlements/resources and no new or expanded entitlements are needed. This impact would be **less than significant** directly, indirectly, and cumulatively.

c. 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?	☐	☐	☒	☐

19c. Response: ***(Source: Independence at Canyon Springs – City of Riverside Sewer Study, dated March 2026*** (Carollo, 2026)***; City of Riverside Sewer Master Plan*** (City of Riverside, 2019)***)***

Less than Significant Impact. Based on the Sewer Study prepared for the proposed Project and included in Technical Appendix L, the proposed Project would generate approximately 0.03 million gallons per day (mgd) of wastewater. Wastewater generated by the proposed Project would be conveyed to the City of Riverside Regional Water Quality Control Plant (RWQCP) for treatment. The Riverside RWQCP has an existing treatment capacity of approximately 46 million gallons of wastewater per day and treats approximately 33 million gallons of wastewater per day on average; therefore, the Riverside RWQCP has approximately 13 million gallons of excess daily treatment capacity. The wastewater generated by the proposed Project would represent approximately 0.2 percent of the excess treatment capacity of the Riverside RWQCP. Therefore, the Riverside RWQCP has adequate capacity to serve the proposed Project's projected wastewater treatment demand in addition to the existing commitments. This impact would be **less than significant** directly, indirectly, and cumulatively.

d. 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?	☐	☐	☒	☐

19d. Response: ***(Source: U.S EPA Construction and Demolition Materials Amounts*** *(EPA, 2003)****; General Plan 2025 FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area*** (City of Riverside, 2007b)***; and CalRecycle Website*** (CalRecycle, 2025a) (CalRecycle, 2025b) (CalRecycle, 2025c)***)***

Less than Significant Impact. Implementation of the proposed Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. Solid waste generated by the proposed Project would be disposed at the Badlands Sanitary Landfill, Lamb Canyon Sanitary Landfill, or El Sobrante Landfill. The Badlands Sanitary Landfill is permitted to receive 5,000 tons of refuse per day and has a total capacity of 82,300,000 cubic yards. According to California's Department of Resources Recycling and Recovery

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

(CalRecycle), the Badlands Sanitary Landfill has a total remaining capacity of 4,900,000 cubic yards and is estimated to reach capacity, at the earliest time, in the year 2059. In November 2025, the peak daily disposal at the Badlands Sanitary Landfill was 3,559 tons, which correlates to an excess daily disposal capacity of 1,441 tons. The Lamb Canyon Sanitary Landfill is permitted to receive 5,000 tons of refuse per day and has a total capacity of 39,681,513 cubic yards. According to CalRecycle, the Lamb Canyon Sanitary Landfill has a total remaining capacity of 14,540,000 cubic yards and is estimated to reach capacity, at the earliest time, in the year 2032. In November 2025, the peak daily disposal at the Lamb Canyon Sanitary Landfill was 3,288 tons, which correlates to an excess daily disposal capacity of 1,712 tons. The El Sobrante Landfill is permitted to receive 16,054 tons of refuse per day and has a total capacity of 209,910,000 cubic yards. According to CalRecycle, the El Sobrante Landfill has a total remaining capacity of 121,083,583 cubic yards and is estimated to reach capacity, at the earliest time, in the year 2051. In November 2025, the peak daily disposal at the El Sobrante Landfill was 14,220 tons, which correlates to an excess daily disposal capacity of 1,834 tons.

Construction Impact Analysis

Solid waste requiring disposal would be generated by the construction process, primarily consisting of discarded materials and packaging. Based on the USEPA construction waste generation factor of 4.39 pounds per sf for residential uses, approximately 491.5 tons of waste is expected to be generated during the Project's construction phase[1]. CALGreen requires a minimum of 65 percent diversion of nonhazardous C&D debris from landfills through recycling or salvage for reuse. Therefore, the proposed Project is estimated to generate approximately 172 tons of solid waste during its construction phase. The proposed Project's building construction phase, which would generate the most solid waste, is estimated to last for approximately 381 days; therefore, the proposed Project is estimated to generate approximately 0.46 tons of solid waste per day requiring landfill during construction.

Operational Impact Analysis

Based on a daily waste generation factor of 7.0 pounds of waste per multi-family dwelling unit obtained from General Plan 2025 FPEIR Table 5.16-M, Estimated Future Solid Waste Generation from the Planning Area, long-term, on-going operation of the proposed Project would generate approximately 0.55 tons of solid waste per day[2]. A minimum of 75 percent of all solid waste would be required to be recycled pursuant to AB 341, consistent with the State's solid waste reduction goals; therefore, Project operation would generate approximately 0.14 tons per day of solid waste requiring disposal at a landfill. Non-recyclable waste generated by the proposed Project would be disposed at the Badlands Landfill, El Sobrante Landfill, or the Lamb Canyon Landfill.

Non-recyclable construction and operational waste generated by the proposed Project would be disposed at the Badlands Sanitary Landfill, Lamb Canyon Sanitary Landfill, or El Sobrante Landfill. As described above, each of these landfills receive well below their maximum permitted daily disposal volume; thus, the relatively minimal waste that would be generated by the proposed Project on a daily basis during construction and operation would represent a negligible amount of the remaining permitted daily capacity of these landfills (4,987 tons of solid waste per day). Construction and operation of the proposed Project would not cause the landfills to exceed their maximum permitted daily disposal volume. Therefore, the proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. This impact would be **less than significant** directly, indirectly, and cumulatively.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

19e. Response: ***(Source: CalRecycle Website*** (CalRecycle, 2026d; CalRecycle, 2026e)***, and RMC Chapter 6.04, Residential Solid Waste and Recyclable Material)***

[1] (229,173 sf of residential and amenity building space × 4.39 pounds per sf) ÷ 2,000 pounds per ton = 491.5 tons
[2] (7.0 pounds x 156 residential units) ÷ 2,000 pounds = 0.55 tons per day

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Less than Significant Impact. Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal 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. A collection program for regular waste, recyclables (e.g., paper, plastics, glass, and aluminum), and organic materials would be implemented in accordance with local and State programs.

Additionally, future residents would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 (AB 939) and any other applicable local, State, and federal solid waste management regulations. AB 939 required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal has been increased to 75 percent by 2020 by SB 341.

In 2024 (the last year data was approved), the City implemented 39 programs to reduce solid waste generation and achieve the increased solid waste diversion required. According to the CalRecycle, these programs involve composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, special waste materials, and transformation. The City had an average disposal rate of 8.1 pounds per resident per day in 2024 (the last year for which information is available). This rate is higher, and therefore more conservative, than the rate of 7 pounds per unit per day identified in the City's General Plan EIR. The disposal rate for residents is lower than the established disposal rate target of 8.6 pounds per resident per day. In other words, the amount of solid waste being generated on a daily basis by residents is less than the City's target. The City will continue to implement waste diversion programs to ensure future compliance with waste reduction requirements. Future residents would participate in the City's solid waste management programs, and contractors would comply with RMC Chapter 6.04, Residential Solid Waste and Recyclable Material. Adherence to the mandatory solid waste management requirements would reduce the amount of solid waste generated by the proposed Project and diverted to landfills, which in turn would aid in the extension of the life of affected disposal sites. Therefore, the proposed Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. This impact would be **less than significant** directly, indirectly, and cumulatively.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. 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?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

20a-d. Response: ***(Source: General Plan 2025 FPEIR Figure 5.7-3 – Fire Hazard Areas; Cal Fire, Fire Hazard Severity Zones*** (Cal Fire, 2025)**)**

No Impact. The State Responsibility Area (SRA) referenced in this threshold is the land where the State of California is financially responsible for the prevention and suppression of wildfires. The SRA does not include lands within city boundaries or in federal ownership; therefore, the Project site and adjacent areas are not within an SRA. Additionally, the Project site is not in a City-designated Fire Hazard Area, as shown in Figure 5.7-3 of the General Plan 2025 FPEIR or in a VHFHSZ, as identified by Cal Fire. The nearest VHFHSZs are located 0.8-mile north and 0.8-mile southwest of the Project site. The Project site is separated from these areas by intervening development and by Canyon Springs Parkway and SR-60

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
to the north and by Valley Springs Parkway and I-215 to the southwest. Therefore, the proposed Project would not result in impacts related to wildfires or exacerbate wildfire hazards. No impact would occur directly, indirectly, or cumulatively.				
21. MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

21a. Response: ***(Source: See the sources presented in the Biological Resources, Cultural Resources and Tribal Cultural Resources sections of this Initial Study)***

Less Than Significant with Mitigation Incorporated. Potential impacts related to habitat of fish or wildlife species were discussed under Responses 4a to 4f in the Biological Resources of this Initial Study. Impacts were determined to be less than significant with payment of the Western Riverside County MSHCP development mitigation fee and implementation of MM BIO-1 and MM BIO-2, which require a pre-construction survey for nesting birds and pre-construction survey for burrowing owl, respectively. The proposed Project would not have the potential to degrade the quality of the environment; would not substantially reduce the habitat of a fish or wildlife species; would not cause a fish or wildlife population to drop below self-sustaining levels; would not threaten to eliminate a plant or animal community; and would not reduce the number or restrict the range of a Rare or Endangered plant or animal.

Additionally, potential impacts to historic and archaeological resources related to major periods of California history or prehistory were discussed under Responses 5a through 5c in the Cultural Resources section, and Responses 17a and 17b in the Tribal Cultural Resources section of this Initial Study. No impact on historical resources would occur, and impacts would be less than significant with compliance with existing regulations in the event of the discovery of human remains. Impacts on archaeological and tribal cultural resources would be minimized and/or avoided through the implementation of MMs CUL-1 through MM CUL-4, which identify requirements for archaeological monitoring during ground-disturbing activities, cultural sensitivity training, and actions to be taken if any resources are discovered..

Implementation of the mitigation measures for biological resources, cultural resources and tribal cultural resources, and compliance with existing regulations would result in **less than significant impacts** after mitigation.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐

21b. Response: ***(Source: Independence at Canyon Springs Transportation Impact Analysis, prepared by Fehr & Peers, dated February 2026*** (Fehr & Peers, 2026) ***[Technical Appendix K].)***

Less Than Significant with Mitigation Incorporated. As identified in the Transportation Impact Analysis prepared for the proposed Project and included in Technical Appendix K, there is planned development adjacent to the Project site, which includes allowed development pursuant to the approved CSBP and CSHC Specific Plans. As discussed in the Air Quality section of this Initial Study, the proposed Project's construction and operational emissions would be less than significant. Therefore, consistent with SCAQMD policy, the cumulative construction and operational impacts of the proposed Project would also be less than significant. With respect to other topical issues, the proposed Project would have no impact, a less

ISSUES (AND SUPPORTING INFORMATION SOURCES)	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
than significant impact, or a less than significant impact with implementation of Project-specific mitigation measures. Therefore, the proposed Project would not result in a cumulatively considerable contribution to any potential cumulative impacts, and no additional mitigation would be required.				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

21c. Response: ***(Source: See sources presented in the Aesthetics, Air Quality, Hydrology & Water Quality, Noise, Hazards and Hazardous Materials, and Transportation sections of this Initial Study)***

Less Than Significant Impact. Effects on human beings were evaluated as part of the Aesthetics, Air Quality, Hydrology & Water Quality, Noise, Hazards and Hazardous Materials, and Transportation sections of this Initial Study and found to be less than significant for each of these sections. Based on the analysis and conclusions in this initial study, the proposed Project would not cause substantial adverse effects, directly or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed Project are **less than significant**.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151, Public Resources Code; Sundstrom v. County of Mendocino, 202 Cal.App.3d 296 (1988); Leonoff v. Monterey Board of Supervisors, 222 Cal.App.3d 1337 (1990).

Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[3]	Monitoring/Reporting Method
Biology	**MM BIO-1** In accordance with MSHCP Objective 6, prior to issuance of grading permits or other permits authorizing ground disturbance or discing, the Project Applicant shall retain a qualified biologist to perform a burrowing owl survey at all potentially suitable habitat sites within the Project's limits of disturbance within 30 days prior to commencement of any ground-disturbing activities at the Project site. Although not anticipated, if burrowing owls are detected on-site during the pre-construction survey, coordination with the CDFW shall occur to determine if an Incidental Take Permit under Section 2081 of the CESA is required. A copy of the results of the pre-construction survey (and all additional surveys) shall be provided to the City of Riverside Planning Division for review prior to any vegetation clearing and ground-disturbing activities.	Retain biologist prior to the issuance of any permit authorizing ground disturbance or discing Burrowing owl survey to be conducted within 30 days prior to ground-disturbing activities	Planning Division	Letter report to the Planning Division documenting results of surveys
	MM BIO-2 If construction occurs between February 1st and August 31st, a qualified wildlife biologist shall conduct a pre-construction clearance survey for nesting birds within three days of the start of any vegetation removal or ground disturbing activities to ensure that no nesting birds shall be disturbed during construction. The biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active avian nests shall occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a no-disturbance buffer. The size of the no-disturbance buffer shall be determined by the wildlife biologist and shall depend on the level of noise and/or surrounding anthropogenic disturbances, line of sight between the nest and the construction activity, type and duration of construction activity, ambient noise,	Within three days of the start of any vegetation removal or ground disturbing activities	Planning Division	Letter report to the Planning Division documenting results of nesting bird surveys

[3] All agencies are City of Riverside Departments/Divisions unless otherwise noted.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[3]	Monitoring/Reporting Method
	species habituation, and topographical barriers. These factors shall be evaluated on a case-by-case basis when developing buffer distances. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel will be instructed on the sensitivity of nest areas. A biological monitor shall be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur.			
Cultural Resources and Tribal Cultural Resources	**MM CUL-1** Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.	Prior to Grading Permit Issuance	Planning Division and Public Works Department.	The Applicant shall notify the City
	MM-CUL-2 Archaeological and Tribal Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor	Prior to Grading Permit Issuance	Planning Division and Public Works Department.	Submission of an Cultural Resources Monitoring Plan and Tribal Monitoring Agreement(s)

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[3]	Monitoring/Reporting Method
	all ground-disturbing activities in an effort to identify any unknown archaeological resources. 1. **Cultural Resources Monitoring Plan:** The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: a. Project grading and development scheduling; b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists; c. The protocols and stipulations that the Applicant, tribes, and project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; d. Treatment and final disposition of any cultural, sacred sites, and human remains if discovered on the project site; and e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM CUL-4. 2. **Native American Monitor:** Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s)			

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[3]	Monitoring/Reporting Method
	regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following: a. The treatment of known tribal cultural resources; b. The treatment and final disposition of any tribal cultural resources, sacred sites, archaeological and cultural resources inadvertently discovered on the Project site; c. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and d. The designation, responsibilities, and participation of professional Tribal Monitor(s) during tree removal, grading, excavation and ground disturbing activities. e. The developer/permit applicant shall provide sufficient evidence that they have made a reasonable effort to reach an agreement with the consulting tribes regards to items a-d, as listed above.			
	MM CUL-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.	During Construction	Planning Division.	Submission of a Phase IV Monitoring Report

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[3]	Monitoring/Reporting Method
	2. **Temporary C**uration 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. 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-			

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[3]	Monitoring/Reporting Method
	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, South Costal Information Center, and consulting tribes.			
	MM CUL-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.	Prior to Grading Permit	Planning Division, Building and Safety Division and Public Works Department.	Submission of a Phase IV Monitoring Report
Geology and Soils	**MM GEO-1** Prior to the issuance of grading permits and/or action that would permit ground disturbance, the Project Applicant shall provide written evidence to the City of Riverside that the Project Applicant has retained a qualified Paleontologist to prepare a Paleontological Resource Impact Mitigation Monitoring Program (PRIMMP), observe grading activities into the paleontologically sensitive soils, and to conduct salvage excavation of paleontological resources as necessary. Sediment samples should also be recovered to determine the small-fossil potential of the site. The Paleontologist shall be present at the pre-grading conference; shall establish procedures and a schedule for paleontological resources surveillance; and shall establish procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the fossils as appropriate. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the City of Riverside.	Retain paleontologist prior to the issuance of grading permits and/or action that would permit ground disturbance Monitoring during construction	Planning Division	PRIMMP submitted to the City

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party[3]	Monitoring/Reporting Method
	The Project Paleontologist shall prepare a final paleontological resource monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). All recovered fossils shall be offered for curation in perpetuity to the Western Science Center in Hemet, the principal fossils repository in Riverside County. A letter documenting receipt and acceptance of all fossil collections by the receiving institution must be included in the final report. The report, when submitted to (and accepted by) the City of Riverside, shall signify satisfactory completion of the project program to mitigate impacts to any nonrenewable paleontological resources.			

REFERENCES

The following references were used in the preparation of this Initial Study.

CA DOE, 2025	California Department of Education, 2025. *Data Quest*. 2025. Accessed April 23, 2025. Available on-line: https://dq.cde.ca.gov/dataquest/
CA Fire Code, 2022	California Fire Code, 2022. *2022 California Fire Code, Section 503*. 2022. Accessed April 17, 2025, Available on-line: https://codes.iccsafe.org/s/CAFC2022P1/chapter-5-fire-service-features/CAFC2022P1-Pt03-Ch05-Sec503#:~:text=Approved%20fire%20apparatus%20access%20roads,into%20or%20within%20the%20jurisdiction.
Cal Fire, 2024	California Department of Forestry and Fire Protection, 2024. *Fire Hazard Severity Zones in State Responsibility Area*. April 1, 2024. Accessed April 17, 2025. Available on-line: https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008
Cal Fire, 2025	California Department of Forestry and Fire Protection, 2025. *2025 Fire Hazard Severity Zones in Local Responsibility Area*. 2025. Accessed April 17, 2025. Available on-line: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones
CalRecycle, 2025a	CalRecycle, 2025a. *SWIS Facility/Site Activity Details, Badlands Sanitary Landfill (33-AA-0006)*. 2025. Accessed January 22, 2026. Available on-line: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367
CalRecycle, 2025b	CalRecycle, 2025b. *SWIS Facility/Site Activity Details, Lamb Canyon Sanitary Landfill (33-AA-0007)*. 2025. Accessed January 22, 2026. Available on-line: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368
CalRecycle, 2025c	CalRecycle, 2025c. *SWIS Facility/Site Activity Details, El Sobrante Landfill (33-AA-0217)*. 2025. Accessed January 22, 2026. Available on-line: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402
Caltrans, 2025	California Department of Transportation, 2025. *California State Scenic Highways Map*. 2025. Accessed March 10, 2025. Available on-line: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa
Carollo, 2026	Carollo 2026. *Independence at Canyon Springs – City of Riverside Sewer Study.* March 18, 2026.
City of Riverside, 2007a	City of Riverside, 2007a. *General Plan 2025*. November 2007. Accessed April 25, 2025. Available on-line: https://riversideca.gov/cedd/planning/general-plan
City of Riverside, 2007b	City of Riverside, 2007b. *Recirculated Draft Program Environmental Impact Report, City of Riverside General Plan 2025 Program*. July 2007. Accessed March 10, 2025. Available on-line: https://riversideca.gov/cedd/planning/general-plan
City of Riverside, 2019	City of Riverside, 2019. *Update of the Integrated Master Plan for the Wastewater Collection and Treatment Facilities, Volume 4, Wastewater Treatment System*. June 2019. Accessed January 22, 2026. Available on-line:

	https://riversideca.gov/publicworks/sites/riversideca.gov.publicworks/files/2019%20Sewer%20Master%20Plan%20Volume%204.pdf
City of Riverside, 2021a	City of Riverside, 2021a. *Phase 1 General Plan Update*. October 5, 2021. Accessed April 25, 2025. Available on-line: https://riversideca.gov/cedd/planning/general-plan
City of Riverside, 2021b	City of Riverside, 2021b. *General Plan 2021-2029 Public Safety Element Technical Background Report*. October 5, 2021. Accessed February 16, 2026. Available on-line: https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/2023/FINAL%20Public%20Safety%20Element%20TBR.pdf
City of Riverside, 2021c	City of Riverside, 2021c. *Housing Element Sixth Cycle 2021-2029*. 2021. Accessed February 27, 2026. Available on-line: https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/2023/2022-09%20Final%20Certified%20HE%20Housing%20Element.pdf
City of Riverside, 2023	City of Riverside, 2023. *Local Hazard Mitigation Plan*. February 24, 2023. Accessed April 16, 2025. Available on-line: https://riversideca.gov/fire/sites/riversideca.gov.fire/files/Riverside%202023%20LHMP%20Draft%20-%20Numbered%20Lines.pdf
City of Riverside, 2025a	City of Riverside, 2025a. *Riverside Municipal Code*. March 4, 2025. Accessed April 25, 2025. Available on-line: https://library.municode.com/ca/riverside/codes/code_of_ordinances
City of Riverside, 2025b	City of Riverside, 2025b. *Map Riverside*. 2025. Accessed April 25, 2025. Available on-line: https://mapriverside.riversideca.gov/Html5Viewer/index.html?Viewer=Public_Viewer.City_Viewer
County of Riverside, 2026	County of Riverside, 2026. *Map My County*. 2026. Accessed February 16, 2026. Available on-line: https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public
CRM Tech, 2025	CRM Tech, 2025. Phase I Historical/Archaeological Resources Survey, Independence at Canyon Springs Project. August 19, 2025.
DOC, 2025	California Department of Conservation, 2025. *California Important Farmland Finder*. February 20, 2025. Accessed January 19, 2026. Available on-line: https://maps.conservation.ca.gov/DLRP/CIFF/
ELMT Consulting, 2025	ELMT Consulting, 2025. *Habitat Assessment and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis for the Proposed Multi-Family Development Project (Independence at Canyon Springs) Located in the City of Riverside, Riverside County, California*. April 4, 2025.
EMWD, 2021a	Eastern Municipal Water District, 2021a. *2020 Urban Water Management Plan*. July 1, 2021. Accessed April 17, 2025. Available on-line: https://content.emwd.org/sites/default/files/2024-07/urbanwatermanagementplan_0.pdf
EMWD, 2021b	Eastern Municipal Water District, 2021b. *Groundwater Sustainability Plan for the San Jacinto Groundwater Basin*. September 2021. Accessed February 16, 2026. Available on-line: https://sgma.water.ca.gov/portal/gsp/preview/71
EPA, 2003	United States Environmental Protection Agency, 2003. *Estimating 2003 Building-Related Construction and Demolition Materials Amounts*. 2003. Accessed January 22, 2026. Available on-line: https://www.epa.gov/sites/default/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf

Fehr & Peers, 2026	Fehr & Peers, 2026. *Independence at Canyon Springs Transportation Impact Analysis*. May 2026.
FEMA, 2008	Federal Emergency Management Agency, 2008. *FEMA's National Flood Hazard Layer (NFHL) Viewer*. August 28, 2008. Accessed April 18, 2025. Available on-line: https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd
KHR Associates, 2026a	KHR Associates, 2026a. *Project Specific Water Quality Management Plan, Independence at Canyon Springs*. January 19, 2026.
KHR Associates, 2026b	KHR Associates, 2026b. *Preliminary Hydrology-Hydraulics Study for Independence at Canyon Springs, Gateway Drive & Canyon Park Drive, Riverside California*. January 19, 2026.
LOR Geotechnical Group, 2025	LOR Geotechnical Group, Inc., 2025. *Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Multi-Family Residential Development, Independence at Canyon Springs, Riverside California*. April 25, 2025.
LOR Geotechnical Group, 2026	LOR Geotechnical Group, Inc., 2026. *Phase I Environmental Site Assessment, Independence at Canyon Springs Proposed Multi-Family Residential Development, 9.13 Acres of Vacant Land, APNs 291-440-003, -005, -006, & -007, NWC Gateway Drive and Canyon Park Drive, Riverside, Riverside County, California*. February 9, 2026.
Moreno Valley, 2021	Moreno Valley, 2021. *Final Environmental Impact Report for the MoVal 2040: Moreno Valley Comprehensive Plan Update, Housing Element Update, and Climate Action Plan*. May 20, 2021. Accessed April 23, 2025. Available on-line: https://moval.gov/city_hall/general-plan2040/Environmental/MV2040_FinalEIR_W-CommentResponse.pdf
MVUSD, 2025	Moreno Valley Unified School District, 2025. *School Site Locator*. 2025. Accessed April 22, 2025. Available on-line: https://www.schoolsitelocator.com/apps/morenovalley/
OPR, 2017	Governor's Office of Planning and Research, 2017. *State of California General Plan Guidelines*. 2017. Accessed February 9, 2026. Available on-line: https://lci.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf
RCALUC, 2014	Riverside County Airport Land Use Commission, 2014. *March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan*. November 13, 2014. Accessed February 15, 2026. Available on-line at: https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/March.pdf
RCALUC, 2026	Riverside County Airport Land Use Commission, 2026. *Proposed March Air Reserve Base/Inland Port Airport Compatibility Map*. Accessed October 2, 2026. Available on-line at: https://rcaluc.org/proposed-2026-amendment-2014-march-air-reserve-baseinland-port-airport-land-use-compatibility-plan
RWQCB, 2019	Regional Water Quality Control Board, 2019. *Water Quality Control Plan for the Santa Ana River Basin*. June 2019. Available on-line at: https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/. Accessed: February 13, 2026.
SCAG, 2024	Southern California Association of Governments, 2024. *Connect SoCal 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast*. April 4, 2024. Accessed April 25, 2025. Available on-line: https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf
SWRCB, 2024	State Water Resources Control Board, 2024. *2024 Integrated Report*. 2024. Accessed April 17, 2025. Available on-line:

	https://gispublic.waterboards.ca.gov/portal/apps/webappviewer/index.html?id=f0e4ac76fd0e4a53bebead89339ef3c9
USCB, 2012	United States Census Bureau, 2012. *2010 Census -Urbanized Area Reference Map: Riverside-San Bernardino, CA*. March 11, 2012. Accessed March 10, 2025. Available on-line: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua75340_riverside--san_bernardino_ca/DC10UA75340.pdf
USCB, 2023	United States Census Bureau, 2023. *American Community Survey (ACS) Demographic and Housing Estimates*. 2023. Accessed April 22, 2025. Available on-line: https://data.census.gov/table/ACSDP1Y2023.DP05?q=DP05&g=160XX00US0662000
UXR, 2026a	Urban Crossroads, 2026a. *Independence at Canyon Springs Air Quality Analysis*. February 19, 2026.
UXR, 2026b	Urban Crossroads, 2026b. *Independence at Canyon Springs Construction Health Risk Assessment*. January 15, 2026.
UXR, 2026c	Urban Crossroads, 2026c. *Independence at Canyon Springs Energy Analysis*. August 12, 2026.
UXR, 2026d	Urban Crossroads, 2026d. I*ndependence at Canyon Springs Greenhouse Gas Analysis*. February 19, 2026.
UXR, 2026e	Urban Crossroads, 2026e. *Independence at Canyon Springs Noise and Vibration Analysis*. March 4, 2026.



Site Photo 1: North of the Project site, along Campus Pkwy, looking south.



Site Photo 2: Northeast of the Project site, along Canyon Park Dr, looking southwest.



Site Photo 3: Northeast of the Project site, along Canyon Park Dr, looking west.



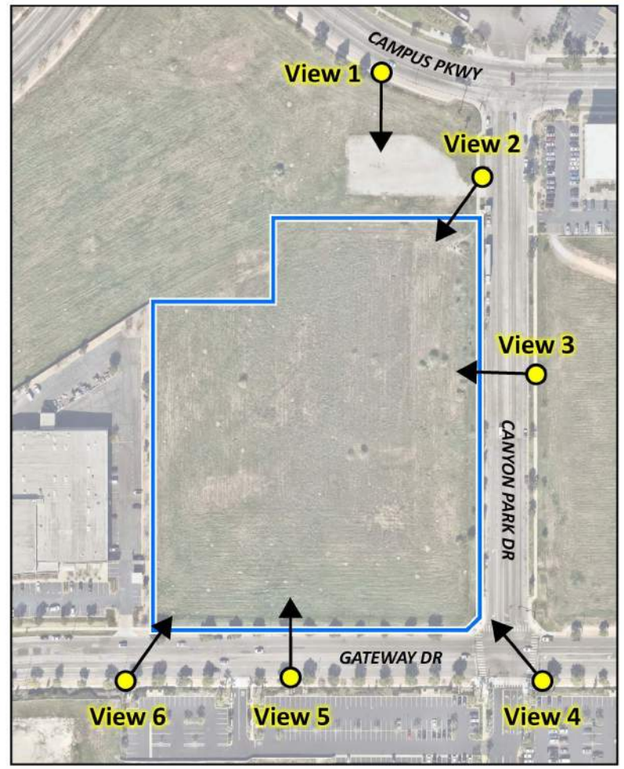
Site Photo 4: Southeast of the Project site, at the intersection of Canyon Park Dr & Gateway Dr, looking northwest.



Site Photo 5: South of the Project site, along Gateway Dr, looking north.



Site Photo 6: South of the Project site, along Gateway Dr, looking northeast.



Source(s): Esri, Nearmap Imagery (January 2026)

Figure 27

Not to Scale

Site Photographs



Source(s): Urban Crossroads (February 2026)

Figure 28

Not to Scale

Receptor Locations

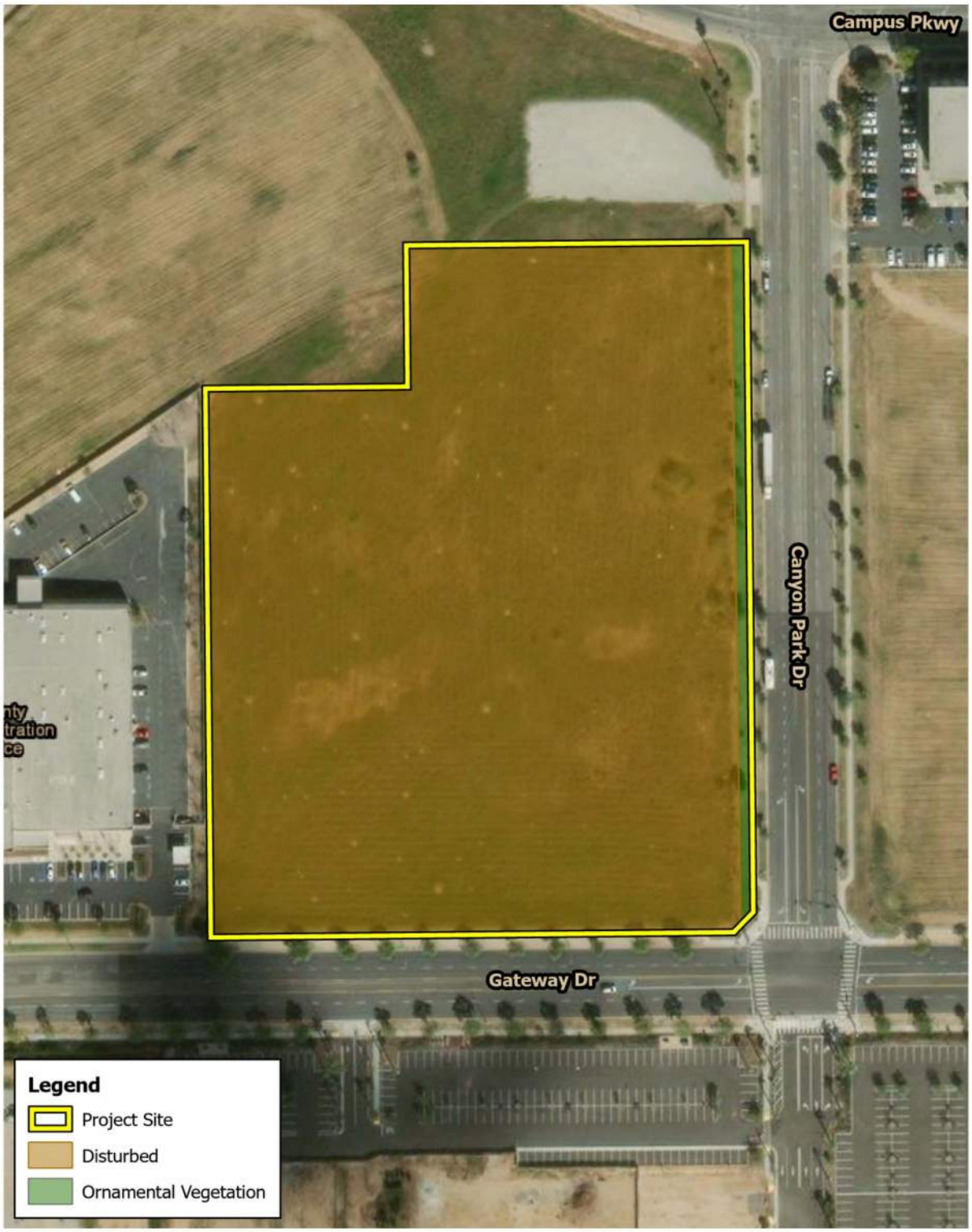


Source(s): Urban Crossroads (February 2026)

Figure 29

Not to Scale

Modeled Construction Emission Sources

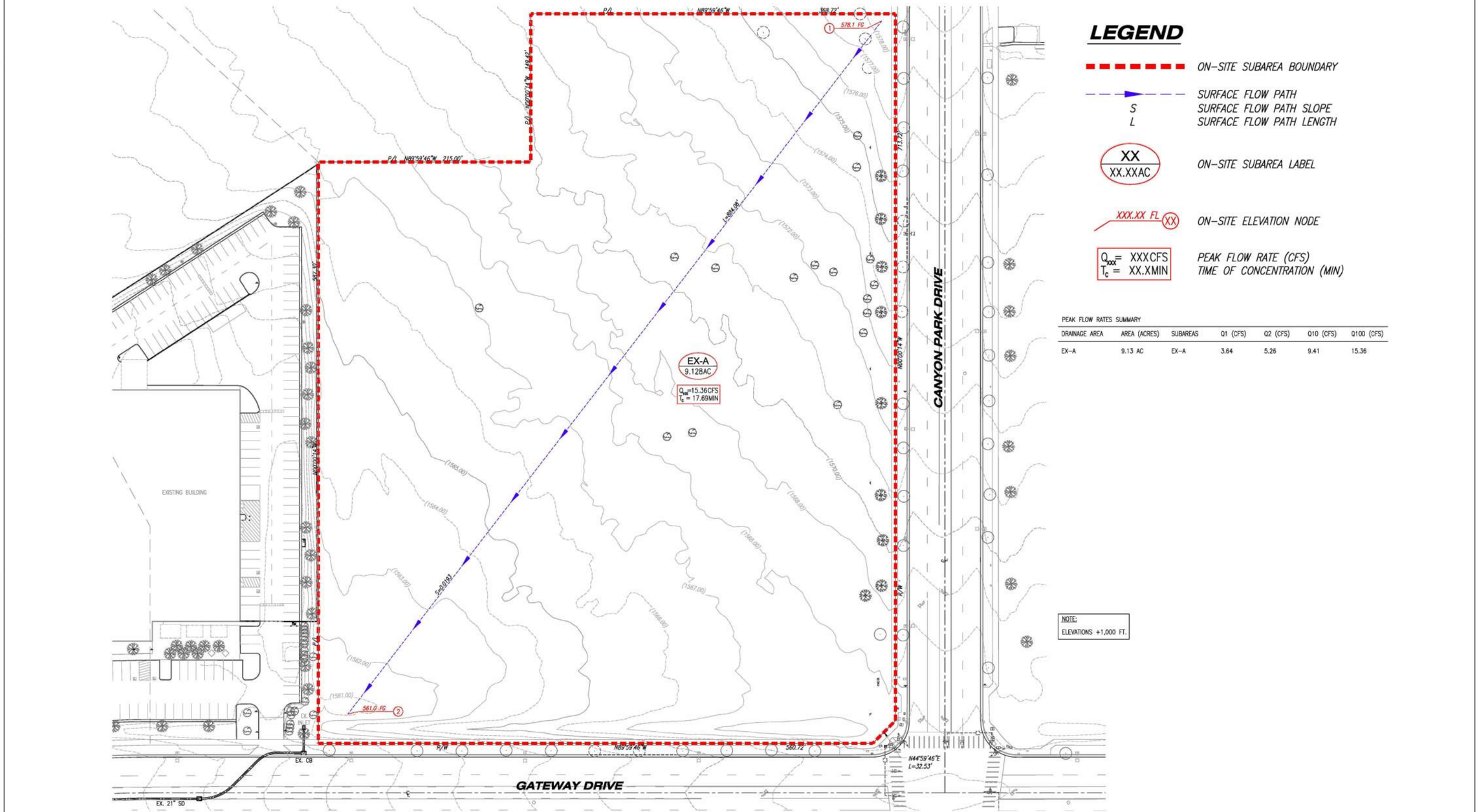


Source(s): ELMT Consulting (04-04-2025)

Figure 30

Not to Scale

Vegetation



PEAK FLOW RATES SUMMARY

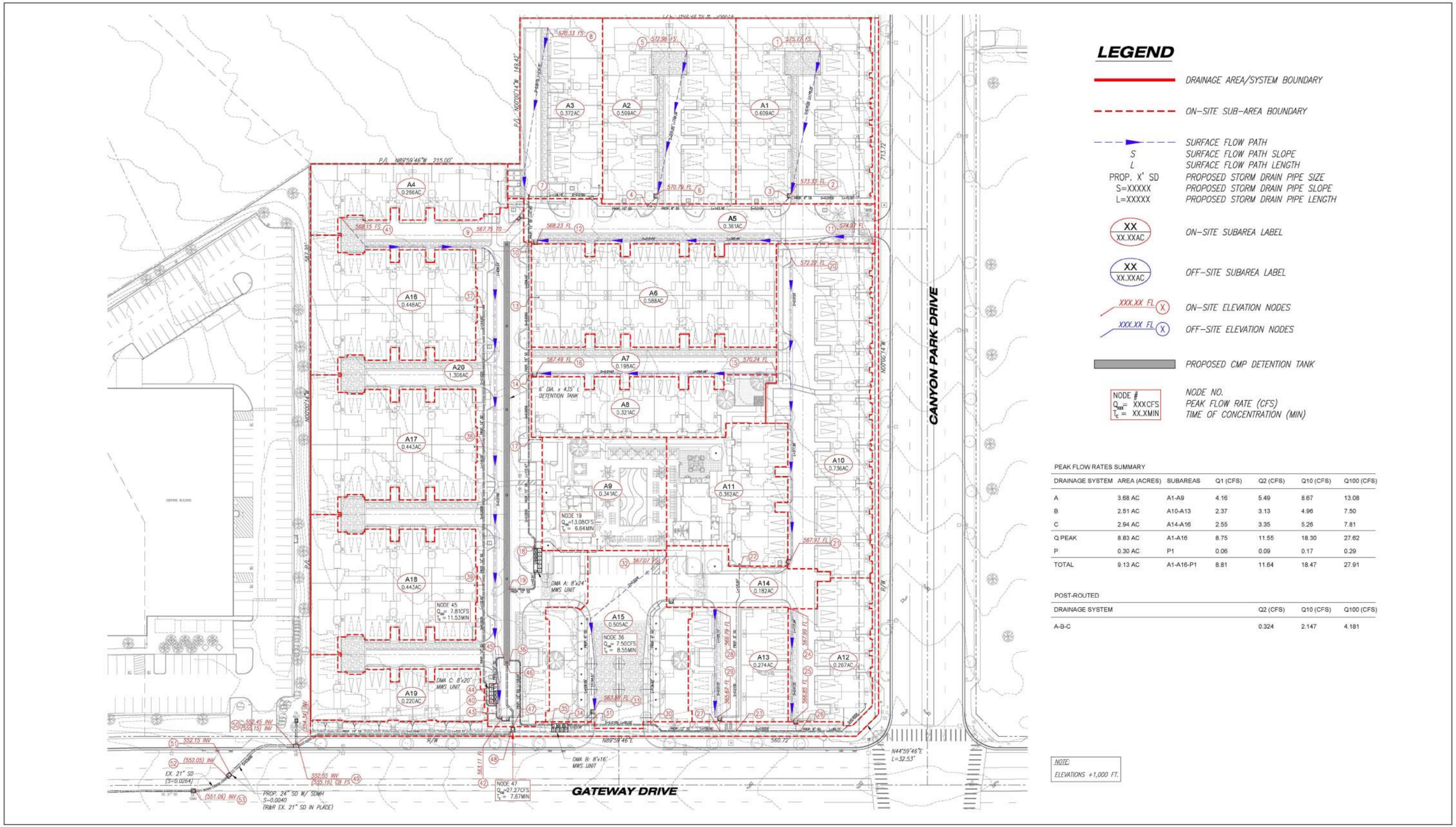
DRAINAGE AREA	AREA (ACRES)	SUBAREAS	Q1 (CFS)	Q2 (CFS)	Q10 (CFS)	Q100 (CFS)
EX-A	9.13 AC	EX-A	3.64	5.26	9.41	15.36

Source(s): KHR (01-19-2026)

Figure 31

Not to Scale

Pre-Development Hydrology Map



LEGEND

- DRAINAGE AREA/SYSTEM BOUNDARY
- ON-SITE SUB-AREA BOUNDARY
- SURFACE FLOW PATH
- S — SURFACE FLOW PATH SLOPE
- L — SURFACE FLOW PATH LENGTH
- PROP. X' SD — PROPOSED STORM DRAIN PIPE SIZE
- S=XXXXX — PROPOSED STORM DRAIN PIPE SLOPE
- L=XXXXX — PROPOSED STORM DRAIN PIPE LENGTH
- XX / XX.XXAC — ON-SITE SUBAREA LABEL
- XX / XX.XXAC — OFF-SITE SUBAREA LABEL
- XXX.XX FL (X) — ON-SITE ELEVATION NODES
- XXX.XX FL (X) — OFF-SITE ELEVATION NODES
- PROPOSED CMP DETENTION TANK
- NODE #, Q_{xxx} = XXXCFS, T_c = XX.XMIN — NODE NO., PEAK FLOW RATE (CFS), TIME OF CONCENTRATION (MIN)

PEAK FLOW RATES SUMMARY

DRAINAGE SYSTEM	AREA (ACRES)	SUBAREAS	Q1 (CFS)	Q2 (CFS)	Q10 (CFS)	Q100 (CFS)
A	3.68 AC	A1-A9	4.16	5.49	8.67	13.08
B	2.51 AC	A10-A13	2.37	3.13	4.96	7.50
C	2.94 AC	A14-A16	2.55	3.35	5.26	7.81
Q PEAK	8.83 AC	A1-A16	8.75	11.55	18.30	27.62
P	0.30 AC	P1	0.06	0.09	0.17	0.29
TOTAL	9.13 AC	A1-A16-P1	8.81	11.64	18.47	27.91

POST-ROUTED

DRAINAGE SYSTEM	Q2 (CFS)	Q10 (CFS)	Q100 (CFS)
A-B-C	0.324	2.147	4.181

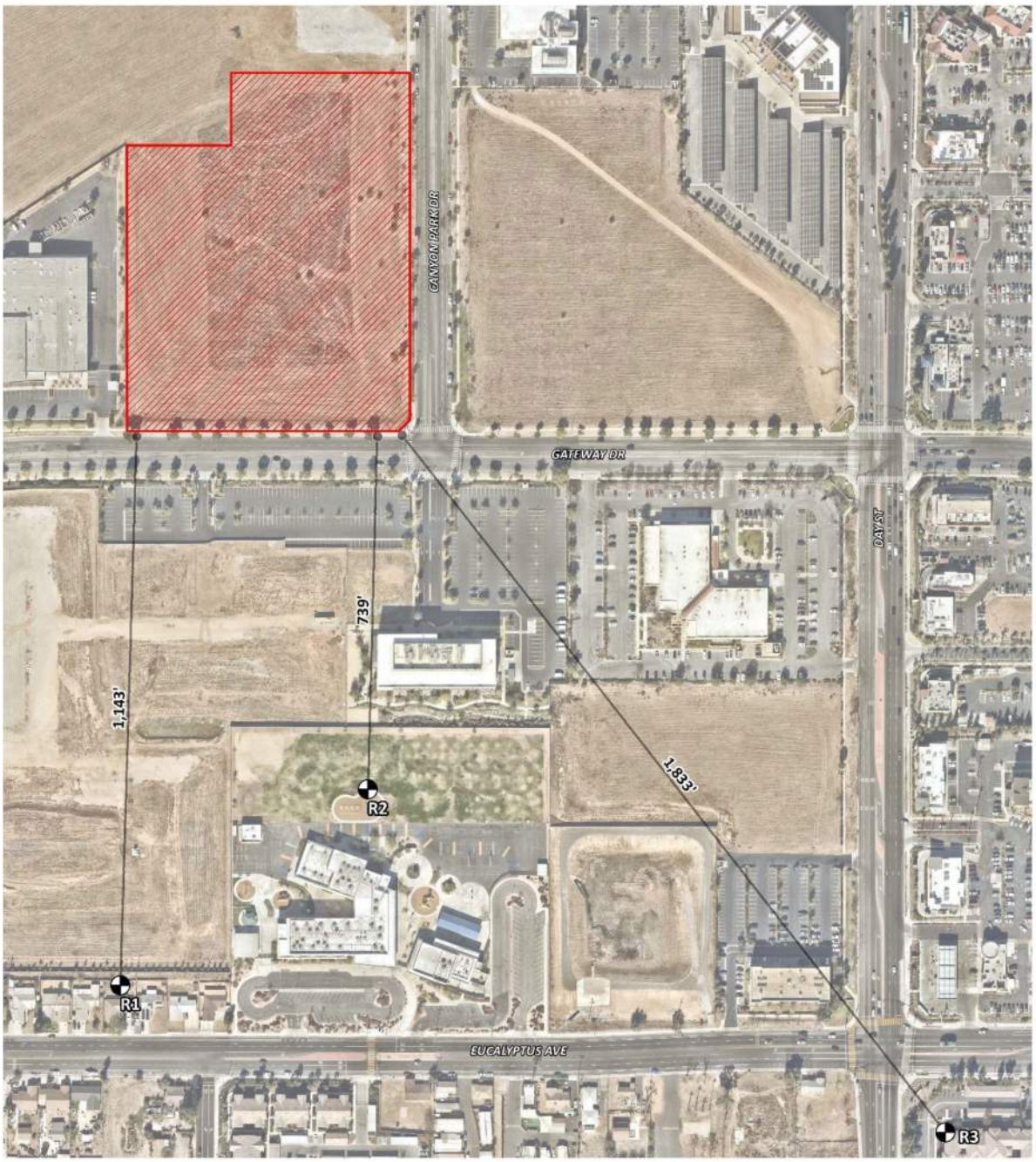
NOTE: ELEVATIONS +1,000 FT.

Source(s): KHR (01-19-2026)

Figure 32

Not to Scale

Post-Development Hydrology Map



Source(s): Urban Crossroads (02-19-2026)

Figure 33

Not to Scale

Construction Noise Source Locations



Source(s): Urban Crossroads (02-19-2026)

Figure 34

Not to Scale

Operational Noise Source Locations