



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Mulberry Gardens Affordable Housing Project

Responsible Entity: City of Riverside

Grant Recipient (if different than Responsible Entity): Housing Authority of the City of Riverside

State/Local Identifier: Pending

Preparer: Ryan Birdseye, Principal
Birdseye Planning Group, LLC
1354 York Drive, Vista, CA 92084
760-712-2199

Certifying Officer Name and Title: Mike Futrell, City Manager

Grant Recipient (if different than Responsible Entity): Housing Authority of the City of Riverside

Consultant (if applicable): Ryan Birdseye, Principal
Birdseye Planning Group, LLC
P.O. Box 1956, CA 92085
760-712-2199

Direct Comments to: Andrea Robles
Housing Project Manager
City of Riverside Housing Authority
3900 Main Street 3rd Floor
Riverside, CA 92522

Project Location: 2524 Mulberry Street in the City of Riverside. The site is 4.07 acres and is comprised of two adjacent parcels owned by the State of California Department of General Services (Assessor's Parcel Numbers 209-130-003 and unassigned). The site is zoned Business and Manufacturing Park (BMP) (Figure 1).

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: Eden Housing proposes to develop the Mulberry Gardens Apartments project on a 4.07-acre site with address 2524 Mulberry Street, Riverside, Riverside County, California 92501 and comprised of two adjacent parcels (APN 209-130-003 and APN unassigned). The site is developed with existing buildings used by the California Department of Forestry and Fire Protection (CalFire) as an operations facility. Existing improvements will be demolished and a new, affordable housing project will be constructed on the site in two phases.

Phase I will consist of affordable senior housing in a four-story building. A total of 59 units will be constructed: 58 one-bedroom units and one two-bedroom unit for an onsite manager. Phase II will construct two four-story buildings containing 150 units of family housing: 73 one-bedroom units; 39 two-bedroom units; and 38 three-bedroom units. Both buildings will be rectangular in shape; the family housing building will contain two interior courtyards; a paseo will separate the buildings and also contain a small park. The project will construct a surface parking lot with 210 spaces: 60 for senior housing and 150 for the family housing portion. A total of 21 stalls will be Electric Vehicle Charging (EVC) stations.

Offsite improvements include curb, gutter and sidewalk reconstructions along two streets: Holding Street and Mulberry Street; and includes infrastructure upgrades required to support the project. Onsite amenities include leasing, management and supportive services offices; community rooms, computer rooms and laundry facilities.

The project is affordable to low-income seniors and extremely low-income and low-income households. The project has been awarded a total of \$4,154,171.70 in federal funding including \$1,157,717.70 in HOME Investment Partnerships Act (HOME) and \$3,000,000 in HOME American Rescue Plan (HOME-ARP) funds from U.S. Housing and Urban Development, as administered by the City of Riverside. Thus, the project will in part be constructed using federal funding from the HOME Investment Partnership Act Program (HOME); and thus, it is subject to National Environmental Policy Act (NEPA) review by Housing and Urban Development (HUD). The project does not qualify for a categorical exclusion; thus, an Environmental Assessment must be prepared consistent with 24 CFR Part 58.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]: The purpose of the proposed project is to provide affordable single-family residential housing for income qualifying seniors, individuals and families.



Figure 1—Vicinity Map  - Project Site

Existing Conditions and Trends [24 CFR 58.40(a)]: The site is approximately 4.07 acres in size and is located at 2524 Mulberry Street in the City of Riverside. The site is located on the east side of Mulberry Street. Holding Street is located to the north; Poplar Street is located to the south. The neighborhood is comprised of a mixture of residential and commercial development. The site is developed with a CalFire operations facility and related improvements. All existing development would be removed to accommodate the project (Figure 2).

The site is bordered by the following uses:

- North: Commercial
- South: Commercial
- West: Single and multi-family residential
- East: SR 91 freeway corridor

Funding Information

Grant Number	HUD Program	Funding Amount
	HOME Investment Partnerships Act Program - ARP FY 2022/23.	-HOME-ARP \$3,000,000
	HOME Investment Partnerships Act Program - FY 21/22	HUD (HOME) - \$1,154,171.70

Estimated Total HUD Funded Amount: \$4,154,171.70

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

Phase I - \$32,000,000

Phase II - \$77,000,000

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.



Figure 2—Site Plan

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
--	---	---------------------------

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6

Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Flabob Airport is the closest airport and is located approximately 2.3 miles west of the site. March Reserve Air Base is located approximately 8 miles southeast of the site. The project site is outside the Flabob Airport Influence Area as defined in the 2004 Riverside County Airport Land Use Compatibility Plan (2004). <i>Source List: [b]</i>
--	---	---

Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No coastal barrier resources under the protection of the Coastal Barrier Resource Act occur in California. The Coastal Barrier Resources Act does not apply. <i>Source List: [a]</i>
--	---	---

Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The site is located in Zone X per the Flood Insurance Rate Map Panel 06065C0726G, August 28, 2008. Flood Zone X is defined as areas outside the 500-year flood plain. Therefore, no adverse impacts related to floodplain management are anticipated. <i>Source List: [c]</i>
---	---	--

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is located in the South Coast Air Basin and air quality is managed by the South Coast Air Quality Management District. The South Coast Air Basin is a non-attainment area for federal ozone and Particulate Matter 10 (PM ₁₀) standards.
--	---	---

The project would result in temporary air emissions during construction and would be a source of emissions post-construction. To determine whether emissions would be *de minimis*, CalEEMod version 2020.4.0 was used to estimate emissions during construction. Table 1 below shows the pollutant modeled, the SCAQMD threshold and project emissions. As shown, maximum daily emissions would not exceed SCAQMD thresholds; thus, emissions would be *de minimis* and no air quality impact would occur as defined by 40 CFR Parts 6, 51, and 93 and Sections 176 (c) and (d) of the Clean Air Act.

Table 1 – Daily Construction Emissions

Pollutant	Daily Emissions (lbs. per day)	Standard (lbs. per day)
ROG	20.6	75
NO _x	27.2	100
CO	26.0	550
PM10	10.2	150
PM2.5	5.7	55

ROG – Reactive Organic Gases

Nox – Nitrogen Oxides

CO – Carbon Monoxide

PM10 – Particulate Matter 10

PM2.5 – Particulate Matter 2.5

Post construction emissions would be associated with operation of vehicles and use of energy to operate the household. Emissions were projected using CalEEMod 2020.4.0 and are shown in Table 2 below. As shown, maximum daily emissions would not exceed SCAQMD thresholds; thus, emissions would be *de minimis* and no air quality impact would occur as defined by 40 CFR Parts 6, 51, and 93 and Sections 176 (c) and (d) of the Clean Air Act.

Table 2 – Daily Operation Emissions

Pollutant	Daily Emissions (lbs. per day)	Standard (lbs. per day)
ROG	8.5	55
NOx	5.3	55
CO	50.6	550
PM10	8.4	150
PM2.5	2.4	55
SOx	0.08	150

SOx – Sulfur Oxides

Health Risk Assessment. Because of the proximity of the site to State Route 91 and an operating railroad corridor, a health risk assessment (HRA) was prepared for the proposed project. Based on the results of the HRA, without mitigation, the cancer risk for project residents would be approximately 26.15 in one million which would exceed the SCAQMD threshold of 10 per million. To reduce the cancer risk to less than 10 per million, the project would be required to install MERV 13 filtration as part of the heating ventilation and air conditioning (HVAC) system. In addition, windows and doors would be weatherproofed, installation of passive electrostatic filtration systems and adoption of a maintenance plan for the HVAC and air filtration systems. With implementation of these measures, the cancer risk from operation of SR 91 would be reduced to 9.63 per million which would be less than the SCAQMD threshold. While not required to reduce cancer risk from the operation of Spruce Street and the nearby railroad corridor, installation of MERV 13 filtration would reduce cancer risk from operation of Spruce Street from 0.23 per million to 0.10 per million and from 6.95 to 2.0 from railroad operation. With mitigation, health risk associated with operation of SR 91 would be **less than significant**.

Source: [d, e]

<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project is not located within a coastal zone. No impacts to coastal zone resources as defined in Sections 307(c) and (d) of the Coastal Zone Management Act would occur.</p> <p><i>Source List: [a]</i></p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>A Phase I Environmental Site Assessment (ESA) was prepared for the project site by Avocet Environmental, Inc., (February 2023). One Recognized Environmental Conditions (RECs) was identified on the project site. The Phase I findings and recommendations are summarized below:</p> <p>The approximately 4.27-acre site occupies Assessor's Parcel Number 209-130-003 and is located northeast of downtown Riverside, immediately adjacent to the Riverside (91) Freeway and southwest of the Pomona (60) Freeway interchange. The original Division of Forestry facility was built in or around 1955 on part of a larger citrus orchard. The original facility had five buildings: an office/administrative building, an equipment storage building, an apparatus storage building; and an auto shop, arranged around a central yard with a gas and oil structure in the center.</p> <p>The gas and oil structure is believed to have been associated with motor vehicle fuel storage and dispensing. The administrative building and the auto shop are still present at the site. The equipment and apparatus storage buildings also are present but have been substantially remodeled to serve as office-type buildings, specifically as the former CAL FIRE Operations Coordination Center (OCC) and media/fitness/telecom buildings, respectively. A concrete block building where the original gas and oil structure was located now houses a backup electrical generator, but it is not thought to be the original structure. Additional buildings were added to the original facility over the years, notably including the former Multiple Agency Coordination (MAC) building, a machine shop, and an electrical/carpentry shop. However, improvements</p>

to the adjoining 90 Freeway and the 60 Freeway interchange in or shortly before 2006 encroached into the original CAL FIRE property, necessitating demolition of the electrical/carpentry shop. To compensate for the loss of space and the electrical/carpentry shop, the southeastern end of the property across Holding Street to the north was annexed to the CAL FIRE property. Additional buildings on the annexed, northern part of the site include a replacement shop building, the former Construction and Engineering building, and a former small paint storage building.

Based on the site's history, an investigation of the possible presence of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and Title 22 metals in the vadose zone was conducted in October 2020 via the collection and analysis of soil matrix samples from 11 borings at depths ranging from 2 to 30 feet below ground surface (bgs), with nested soil vapor probes installed at 5 and 15 feet bgs in 9 of these borings. Based on the results of the vadose zone investigation, the impact of site operations, including those related to vehicle refueling and maintenance, on the subsurface appears to have been minimal, and no additional soil investigation is warranted or recommended. However, based on the investigation, one Recognized Environmental Condition was identified as follows:

VOCs in Soil Vapor. Soil vapor sampling detected tetrachloroethylene (PCE) in several borings at concentrations that exceed the SFBRWQCB residential Environmental Screening Levels (ESL). Several other Volatile Organic Compounds (VOCs) were also detected in soil vapor, though in fewer samples and at significantly lower concentrations, which were below applicable screening levels. Based on the results of the investigation, a vapor intrusion condition (VIC) may be present at the site. However, the source(s) of the VOCs in soil vapor is unclear

		<p>and may be related to an offsite source, such as the Southern California Rapid Transit District (SCRTD) site to the north. As such, a vapor encroachment condition (VEC) may also be present at the subject site. Considering the non-<i>de minimis</i> results of the Phase II investigation, VOCs in soil vapor is considered a REC. To address the potential impact related to soil vapor intrusion, mitigation measures are recommended:</p> <p>To address the potential for asbestos containing material in the existing structures, prior to demolition, the Phase I recommended the following mitigation:</p> <p>With mitigation, the proposed project would not introduce hazardous materials to the site or otherwise have any adverse impacts related to explosive or flammable operations.</p> <p><i>Source List: [f, y]</i></p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is comprised of two disturbed parcels. Vegetation consists of ruderal species, ornamental trees/shrubs and turf grass.</p> <p>The project would replace existing disturbed areas and ornamental landscaping with 209 apartment units and landscaping. No federal or state listed threatened, endangered or species of concern or their habitat are located on the site. No local species would be adversely affected by the project.</p> <p><i>Source List: [g]</i></p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The proposed project is a 209-unit residential project designed to provide affordable housing for income qualifying tenants. It would not require the ongoing use, storage or routine transport of hazardous, explosive or flammable materials. Aside from common household chemicals, no hazardous materials would be used on-site. The project would not emit or release hazardous waste or emissions.</p> <p>The project site and neighboring properties do not</p>

		<p>contain facilities or sites containing hazardous materials or that are affected by a known release of hazards or hazardous materials. No known potential for exposure to significant hazards from the site or surrounding properties was identified. No mitigation measures are required.</p> <p><i>Source List: [a, f, y]</i></p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is currently developed and categorized as Urban and Built-Up Land, as indicated on the State Farmland Mapping and Monitoring Program maps for the County of Riverside (2012). The site does not include prime or unique farmland, or other farmland of statewide or local importance. No impact to farmland resources defined under the Farmland Protection Policy Act per 7 CFR 658 would occur.</p> <p><i>Source List: [h]</i></p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The site is located in Zone X per the Flood Insurance Rate Map Panel 06065C0726G, August 28, 2008. Flood Zone X is determined to be outside of the 500-year flood plain. Therefore, no adverse impacts related to floodplain management are anticipated per 24 CFR 55 and Executive Order 11988.</p> <p><i>Source List: [c]</i></p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly Sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Historic Resources. A historic building evaluation was performed for the project site by PaleoWest, LLC as part of the Phase I Cultural Resource Report (June 2023).</p> <p>PaleoWest conducted a pedestrian survey of the proposed Project Area of Potential Effect (APE) on May 4, 2023. The survey found that the Project APE is fully developed with multiple buildings and associated landscaping. One built-environment resource, a complex of buildings constructed in 1955 that were the headquarters of Cal Fire, was identified and documented during the field work effort. The historic period building complex was evaluated for listing in the National Register of Historic Places (NRHP) and recommended</p>

		<p>ineligible. No prehistoric resources were identified during field work. The limited exposed sediments throughout the APE are all associated with landscaped areas and do not appear to represent undisturbed or natural soils. The extant data indicate that the APE appears to have a relatively low potential for containing intact buried archaeological deposits.</p> <p>Based on these findings, it is recommended that a finding of no historic properties affected under Section 106 of NHPA be made for the proposed project.</p> <p><i>Source List: [a, x]</i></p>												
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><i>Construction</i></p> <p>The proposed project would generate short-term noise during project construction. As shown in the table below, maximum noise levels related to construction would be approximately 85 A-weighted decibels (dBA) at a distance of 25 feet (EPA, 2010).</p> <p>Typical Noise Levels at Construction Sites</p> <table border="1" data-bbox="857 1108 1382 1497"> <thead> <tr> <th>Construction Phase</th> <th>Average Noise Level at 25 Feet</th> </tr> </thead> <tbody> <tr> <td>Clearing</td> <td>84 dBA</td> </tr> <tr> <td>Excavation</td> <td>85 dBA</td> </tr> <tr> <td>Foundation/Conditioning</td> <td>85 dBA</td> </tr> <tr> <td>Laying Sub-base/Paving</td> <td>81 dBA</td> </tr> <tr> <td>Finishing</td> <td>84 dBA</td> </tr> </tbody> </table> <p>Chapter 7.35.10(B)(5) of the Riverside Municipal Code prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration, grading or demolition work between the hours of 7:00 p.m. and 7:00 a.m. on weekdays and between 5:00 p.m. and 8:00 a.m. on Saturdays or at any time on Sunday or federal holidays.</p>	Construction Phase	Average Noise Level at 25 Feet	Clearing	84 dBA	Excavation	85 dBA	Foundation/Conditioning	85 dBA	Laying Sub-base/Paving	81 dBA	Finishing	84 dBA
Construction Phase	Average Noise Level at 25 Feet													
Clearing	84 dBA													
Excavation	85 dBA													
Foundation/Conditioning	85 dBA													
Laying Sub-base/Paving	81 dBA													
Finishing	84 dBA													

		<p>Construction that occurs weekdays between 7:00 a.m. and 7:00 p.m. and between 8:00 a.m. and 5:00 p.m. on Saturday's, provided a permit has been obtained from the City as required, is exempt from regulation per 7.35.20(G) of the Riverside Municipal Code.</p> <p>Per Chapter 7.25, Table 7.25.010A, of the Riverside Municipal Code, the maximum allowable exterior noise level at residences is 55 dBA from 7 a.m. to 10 p.m., and 45 dBA from 10 p.m. to 7 a.m. Table 7.30.015 limits interior noise levels to 45 dBA from 7:00 a.m. to 10:00 p.m. and 35 dBA from 10:00 p.m. to 7:00 a.m.</p> <p>Project construction would be required to comply with the City of Riverside Noise Ordinance referenced above. In this case, there are sensitive properties located north and southwest of the site. While construction noise would be audible at the property boundary, compliance with the City's noise ordinance would avoid adverse impacts related to construction noise.</p> <p><i>Operation</i></p> <p>An exterior façade analysis was prepared for the proposed project (dBF & Associates, October 2022). In summary, future exterior roadway noise levels at the proposed buildings would range from below 60 dBA Ldn at the east façade to approximately 78 dBA Ldn at the west façades. Future exterior noise levels at all required outdoor spaces in the project would be 65 dBA Ldn or below, and would be considered Normally Acceptable by the City of Riverside and "acceptable" by HUD. Because future exterior noise levels would exceed 60 dBA Ldn at some project building façades (primarily those facing SR 91), interior noise levels in occupied residential areas could exceed the Riverside Municipal Code Section 16.08.175, California Building Code Section 1206.4, and HUD limit of 45 dBA Ldn.</p>
--	--	--

		<p>To avoid a potential land use impact, as mitigation, an interior noise analysis shall be performed and approved by the City's Building Inspection Department upon application for a building permit. This interior noise analysis must identify the sound transmission loss requirements for building façade elements (windows, walls, doors, and exterior wall assemblies) necessary to ensure interior noise levels do not exceed 45 dBA Ldn in habitable residential rooms. Measures may include upgrading windows and/or doors with Sound Transmission Classification (STC) ratings to 35 or higher. If the interior noise limit can be achieved only with the windows closed, the building design must include mechanical ventilation that meets CBC requirements.</p> <p>Given the existing ambient condition, project trips on Mulberry Street are not expected to cause an increase in ambient noise conditions. However, because existing noise levels exceed the 65-dBA Ldn exterior standard, design features incorporated as mitigation are required to ensure the 45 dBA Ldn interior standard is met.</p> <p>The Flabob Airport is the closest airport and is located approximately 2.3 miles west of the site. March Reserve Air Base is located approximately 8 miles southeast of the site. The project site is outside the Flabob Airport Influence Area as defined in the 2004 Riverside County Airport Land Use Compatibility Plan (2004). No noise impacts related to airport operations would occur.</p> <p><i>Source List: [a, b, w]</i></p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no sole source aquifers in Riverside County as designated by the US Environmental Protection Agency Pacific Southwest Region 9. The project would not use groundwater or otherwise impact groundwater recharge. Further, the project improvements would not increase demand for potable water. No impacts to sole source aquifers as defined per 40 CFR 149 would occur.</p>

		<i>Source List: [j]</i>
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The site is in a heavily urbanized area. According to the U.S. Fish and Wildlife Service's Wetlands Online Mapper, no wetlands are located on or immediately adjacent to the project site. No adverse impacts related to wetlands protection are anticipated. <i>Source List: [g]</i>
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The nearest river is the Santa Ana River located approximately 1.3 miles west of the site. Per the National Wild and Scenic River System maps, no segment of the Santa Ana River is designated wild and scenic per Sections 7(b) and (c) of the Wild and Scenic Rivers Act. No wild and scenic rivers would be affected by the project. <i>Source List: [k]</i>
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project would provide 209 apartment units for income qualifying tenants. The project would be constructed on a developed commercial site. The project would not remove housing or otherwise displace minority or low-income communities to accommodate construction. The project would not violate Executive Order 12898. <i>Source List: [a]</i>

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits or approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>The project site is located in a Business and Manufacturing Park (BMP) zoning district. As stated in the Categorical Exemption documentation prepared for California Environmental Quality Act (CEQA) compliance, the project is consistent with the City of Riverside's General Plan and Zoning use and intensity designations for the project site as defined in a certified Environmental Impact Report (EIR) (State Clearinghouse Number 2021040089) prepared for a General Plan Update and zoning amendments adopted in 2021 in connection with the City's update of its Housing Element.</p> <p>The project would be located in an area of single-family residential to the west and commercial/light industrial uses to the north/south. The project would be consistent with the scale and urban design features within the neighborhood. No impact would occur under this threshold.</p> <p><i>Source List: [a, l, m]</i></p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>Soils. Per the City of Riverside General Plan Environmental Impact Report, the soil type in the general project is comprised of the Arlington series. The soils are characterized by weekly cemented sandy loam with low to moderate shrink-swell potential. The depth is 24-36 inches. The organic matter and sand within loamy soils creates a favorable soil structure that improves soil stability and permeability. This increases the soil's capacity for the infiltration of water, delays the start of erosion, and reduces the amount of runoff.</p>

		<p>Slope Erosion. The site is flat which limits erosion potential. There are no slopes that would erode as a result of project construction.</p> <p>Stormwater Runoff. The majority of the site is impervious and would remain so with the proposed project. The proposed project would require the preparation of a Water Quality Management Plan (WQMP) to address storm flows. The WQMP would specify site design and source control best management practices (BMPs) in permit conditions or conditions of approval. This would ensure that erosion and sedimentation impacts would be less than significant. No adverse impacts would occur.</p> <p><i>Source List: [a, n, z]</i></p>
<p>Hazards and Nuisances including Site Safety and Noise</p>	<p>2</p>	<p>Hazards and Nuisances. The proposed project is a residential project designed to provide housing for low income families. It would not require the ongoing use, storage or routine transport of hazardous materials. Aside from common household chemicals, no hazardous materials would be used on-site. The project would not emit or release hazardous waste or emissions.</p> <p>As referenced, based on review of the Phase I Environmental Site Assessment (ESA), One Recognized Environmental Conditions (RECs) was identified on the project site. This would be mitigation with implementation of Mitigation Measures HAZ-1, HAZ-2 and HAZ-3.</p> <p>The project would be constructed consistent with current City of Riverside requirements for fencing, lighting and other features related to site safety. No impacts related to hazards, nuisance or site safety would occur.</p> <p>Regarding noise, the proposed project would be exposed to exterior noise levels that currently exceed HUD standards and acceptable limits within the City of Riverside Municipal code. The interior noise standard is 45 dBA CNEL. As referenced, in Mitigation Measure NOI-1, an interior acoustical analysis would be prepared at the time of building permit application to identify design requirements to ensure that the 45 dBA interior standard</p>

		would be met. With mitigation, no adverse interior noise impacts would occur with the project. <i>Source List: [a, f, y]</i>
Energy Consumption	2	Neither construction nor operation of the project would require significant amounts of energy. During construction, the proposed project would require the use of electricity, gasoline and diesel fuel to power the construction equipment. However, this energy consumption would be short-term and temporary and would not have adverse impacts on long-term energy consumption for the overall housing complex. The project would be compliant with the California Energy Code, California Building Energy Efficiency Standards (2022) as well as other applicable regulations that pertain to the use of energy efficient design methods and materials. Therefore, no adverse energy consumption impacts would occur. <i>Source List: [aa]</i>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	During construction, the project would generate temporary employment opportunities. These jobs would not substantially affect overall employment patterns in the City. The project would not generate post-construction jobs. Construction-related jobs would be a temporary and minor benefit. <i>Source List: [a, aa]</i>
Demographic Character Changes, Displacement	1	The proposed project would develop 209 new apartment units for income qualifying tenants. All construction would be confined to the proposed site. It would not impact adjacent street corridors and all utility improvements would remain as existing. The project area includes single/multi-family and commercial uses. The proposed residential development would be consistent with the City of Riverside Zoning Code. The project would construct new multifamily residences of similar size and scale to

		existing development. It would not adversely affect community character or displace existing residents. <i>Source List: [a, l, aa]</i>
--	--	---

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	1	<p>The public school nearest the site is Fremont Elementary School located at 1925 Orange Street approximately 0.5 miles northwest of the site. John W. North High School located at 1550 3rd Street, approximately one mile southeast of the site. The City of Riverside provides library and related cultural services to its residents through the Public Library System. The nearest library is the Main Library located at 3581 Mission Inn Avenue approximately 0.65 miles south of the site.</p> <p>The project is comprised of 209 multi-family residences of which 50 would be for senior residents and 159 would be family apartments. Using the Riverside Unified School District student generation rate factors, each unit would generate 0.48 elementary, middle and high school student. Assuming 159 family residences, the number of school age children living at the property is conservatively estimated to be 76. The project would be subject to the payment of impact fees used to fund the expansion of school infrastructure needed to address future capacity constraints. However, it is likely that the future residents currently reside in the Riverside Unified School District; thus, the addition of 76 new students would not affect capacity.</p> <p>With respect to library services, it is possible that residents may visit the library; however, the addition of new residents to the neighborhood would not exceed the service population to the extent that new library facilities are required. As noted, it is assumed the residents currently live in Riverside; thus, demand for library services would not change with the project.</p> <p><i>Source List: [a, o, aa]</i></p>

Commercial Facilities	2	<p>The proposed project would not provide commercial services or uses. The need for goods and services required by the new residents would be met by existing businesses within the area. No adverse impact to commercial facilities would occur as a result of the project.</p> <p><i>Source List: [a, aa]</i></p>
Health Care and Social Services	1	<p>The proposed project would provide new residential units to serve income qualifying tenants. It is assumed the residents are currently residing in the Riverside area. The project would not increase the general population to the degree that expanded health care services would be required. Riverside Community Hospital and Loma Linda University Medical Center are located approximately 2 miles southwest and southeast of the site. These and other medical facilities are accessible by transit and available to serve project residents. No adverse impacts related to health care are anticipated.</p> <p><i>Source List: [a, aa]</i></p>
Solid Waste Disposal / Recycling	2	<p>Construction activities would temporarily generate solid waste in the form of construction debris (e.g., drywall, asphalt, lumber, and concrete) and household waste associated with single-family residences.</p> <p>The California Integrated Waste Management Act (CIWMA) of 1989 mandates that all cities and counties in California reduce solid waste disposed at landfills generated within their jurisdictions by 50% and has a long-term compliance goal of 70%. AB 341 (2015) increased the recycling goal to 75%. CDW associated with the proposed project will be recycled to the extent practicable with the remainder sent to a landfill. It is assumed the contractor would be conditioned to comply with all applicable recycling and disposal requirements for construction and demolition waste.</p> <p>Solid waste generated in the City of Riverside is collected by Burrtec, Inc. and disposed of in county landfills. The nearest landfill is Badlands Landfill located in Moreno Valley, California. However, it is at or nearing capacity with closure expected by 2022. Thus, solid waste generated by the proposed project would likely be</p>

		<p>disposed of at the Lamb Canyon landfill located south of Beaumont, CA east of Riverside. The project would be provided recycling bins to accommodate recycled material which would reduce the amount of waste disposed of in landfills. The addition of the new units would not adversely impact solid waste and collection and disposal within the City of Riverside.</p> <p><i>Source List: [a, e, p]</i></p>
Waste Water / Sanitary Sewers	2	<p>The proposed project would utilize existing sewer connections. Sewer requirements for incoming development projects are administered by the City Riverside Water District and City of Riverside Sewer Department. Sewer trunk lines are continually monitored in the field to determine remaining capacity. The Engineering Division plans its capital improvement projects several years prior to pipelines actually reaching capacity.</p> <p>The project site is located in an urbanized area that was developed and connected to existing infrastructure. The project would reconnect to the existing wastewater infrastructure serving the site pursuant to the City's Municipal Code requirements. Prior to issuance of building permits, wastewater impact and connection fees would be paid to the City to cover fair share costs associated with adequate wastewater conveyance, treatment and disposal. No adverse impacts would occur.</p> <p><i>Source List: [a, q, aa]</i></p>
Water Supply	2	<p>The proposed project would utilize existing water connections provided by the City of Riverside. The water system services existing residential development within the project area; thus, it is expected that the project would install new laterals to serve the buildings. The project is expected to consume approximately 49,315 gpd of potable water for domestic use (CalEEMod 2020.4.0, 2021). This is consistent with demand projections for multifamily residences. The project would require a zone change and General Plan amendment to allow increased density on the site; however, the addition of 209 new apartment residences would not exceed projected demand for water anticipated in the 2020 Urban Water Management Plan. Further, the project is subject to water fees that would be paid by the</p>

		<p>applicant prior to receipt of a building permit. No new or expanded water connections would be required for the project.</p> <p><i>Source List: [a, e, u, aa]</i></p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The City of Riverside Fire Department provides fire protection, paramedic and emergency medical technician services to the project site. Station Number 6 located at 1077 Orange Street is approximately 1 mile north of the project site.</p> <p>Law enforcement services are provided by the City of Riverside Police Department. The Police Department Field Operations Division is headquartered at the Lincoln Station which is located at 8181 Lincoln Avenue. The Field Operations Division is the largest division of the Police Department and provides first response to all emergencies, performs preliminary investigations, and provides basic patrol services to the City of Riverside. The project site is located in the North Policing Center. The station is located at 10540 Magnolia Avenue, approximately 2 miles southwest of the project site.</p> <p>The proposed project would increase demand for fire and police protection services; however, not to the extent that new facilities would be required. Staffing needs are evaluated based on changing demographics within each service area and adjustments made within each department. The project would be subject to the payment of impact fees used to fund the expansion of fire/police services to meet demand. No adverse impacts related to fire/police services would occur.</p> <p><i>Source List: [r, s]</i></p>
Parks, Open Space and Recreation	2	<p>The project would not increase demand for recreational facilities such that existing facilities would be adversely affected. The project would construct common and outdoor areas per Chapter 19.100.070 of the Riverside Municipal Code which would provide some recreational benefit. Fairmount Park is located approximately 1 mile west/northwest and is the closest park to the site. The project would be subject to the payment of impact fees used to fund the expansion of recreational infrastructure needed</p>

		to address future demand for park services. Demand for use of this park is not expected to be adversely affected by construction of the proposed project. <i>Source List: [a, aa]</i>
Transportation and Accessibility	2	Project construction and material staging would occur on the project site. During construction, some temporary traffic control measures may be required to allow vehicles to safely enter and exit the site. The site would accommodate 209 new multifamily residences. Per the City of Riverside Traffic Impact Analysis Preparation Guide, projects that provide 100 percent affordable housing are exempt from preparation of the traffic impact study or vehicle miles traveled (VMT) analysis. These projects would not generate enough daily vehicle trips to warrant evaluation of project-specific traffic impacts. <i>Source List: [f]</i>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The proposed project site is located within a heavily urbanized area north of downtown Riverside. The project site is disturbed. There are no unique natural features or water resources occurring on the project site. <i>Source List: [a, g, aa]</i>
Vegetation, Wildlife	2	The project area is heavily urbanized. There are no sensitive plants or animal species, habitats, or wildlife migration corridors in the area, or on-site. The only plant species are ruderal, sparse turf grass and ornamental trees/shrubs. The only wildlife species observed are common birds. <i>Source List: [a, g]</i>
Energy and Climate Change	2	Climate Change. The project site is not located proximal to coastal areas that may be subject to sea level rise, wildland areas that may be subject to wildfire or other natural conditions that could be affected by climate change. The projects would be designed consistent with City of Riverside landscape standards and include shade

	<p>trees and other amenities intended to minimize the urban heat island effect.</p> <p>Energy. Project construction would utilize common methods for site preparation, grading and installation of all infrastructure. Construction vehicles and equipment would utilize fossil fuels such as gasoline, diesel fuel, and motor oil. However, construction would be short-term and temporary. The project is not anticipated to include any unique features or construction techniques that would generate high energy demand or be wasteful or otherwise result in inefficient use of fuels or other sources of energy. The project would conform with all state and local requirements regarding construction-related energy use, including anti-idling regulations.</p> <p>The project would be required to comply with California Energy Code Title 24 requirements. Further, the project would implement water conservation strategies focused on achieving the goals set forth by Senate Bill X7 7 (2010) which mandates a statewide 20% per capita reduction in water consumption by 2020. The proposed project will have to meet Title 24 energy requirements and comply with California Building Code's (CBC) Zero Net Energy requirements if in affect at time of building permit issuance.</p> <p><i>Source List: [a, aa, bb]</i></p>
--	--

Additional Studies Performed: The following additional studies were performed:

- Air Quality Health Risk Assessment, Illingsworth and Rodkin, Inc., January 2023
- Exterior Noise Analysis, dBF & Associates, Inc., October 2023
- Phase I Cultural Resource Report and Historic Evaluation, PaleoWest, Inc., June 2023
- Phase I Environmental Site Assessment, Avocet Environmental, Inc., February 2023
- Geotechnical Investigation, Leighton and Associates, Inc., June 2022

Field Inspection (Date and completed by): Multiple field inspections have been performed during preparation of technical reports addressing on-site environmental conditions.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- a. Site observations, February 2023.
- b. Riverside County Airport Land Use Compatibility Plan Policy Document Figure FL-1 (Adopted March 2004)
- c. Federal Emergency Management Agency, Flood Insurance Rate Map No. 06065C0726G, August 28, 2008
- d. Birdseye Planning Group, LLC, Air Quality Modeling and Emission Calculations, 2524 Mulberry Street Project, February 2023
- e. California Emission Estimator Model, 2020.4.0.
- f. California State Department of Water Resources, Water Resources Control Board, Geotracker website, http://www.waterboards.ca.gov/gama/geotracker_gama.shtml
- g. United States Fish & Wildlife Service, Wetlands Mapper, accessed February 2023 <https://www.fws.gov/wetlands/data/mapper.HTML>
- h. California Department of Conservation, Division of Land Resource Protection. Farmland Mapping and Monitoring Program Map. Available at <http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx>. Accessed online January 2023.
- i. Institute of Transportation Engineers (ITE) Trip Generation 10th Edition, October 2017.
- j. US Environmental Protection Agency, Sole Source Aquifer website accessed January 2023 <https://www3.epa.gov/region9/water/groundwater/ssa.html>.
- k. National Wild and Scenic Rivers System, www.nps.gov/rivers, accessed online January 2023.
- l. City of Riverside Municipal Code, Chapter 19, Zoning.
- m. City of Riverside General Plan 2015 Environmental Impact Report, November 2007.
- n. City of Riverside Storm Water Program website accessed January 2023

<https://www.sandiego.gov/tsw/programs/flood>

- o. Riverside Unified School District Fee Justification Report for New Residential, Commercial/Industrial Development (March 2012)
- p. Riverside County Department of Waste Resources, Lamb Canyon Landfill Information, website <http://www.rcwaste.org/landfill/lambcanyon>, accessed January 2023.
- q. City of Riverside Public Utilities Department, website <https://www.riversideca.gov/utilities/> accessed January 2023.
- r. City of Riverside Fire Department website <https://www.riversideca.gov/fire> accessed January 2023
- s. City of Riverside Police Department website <https://www.riversideca.gov/rpd> accessed January 2023
- t. City of Riverside Draft Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (July 2020)
- u. City of Riverside, 2020 Urban Water Management Plan, Riverside Public Utilities Water Division, June 2021
- v. Mulberry Gardens, Air Quality Health Risk Assessment, Illingsworth and Rodkin, Inc., January 2023
- w. Mulberry Gardens, Exterior Noise Analysis, dBF & Associates, Inc., October 2023
- x. Phase I Cultural Resource Report and Historic Evaluation, Mulberry Gardens, PaleoWest, Inc., June 2023
- y. Phase I Environmental Site Assessment, Mulberry Gardens, Avocet Environmental, Inc., February 2023
- z. Geotechnical Investigation for Mulberry Gardens, Leighton and Associates, Inc., June 2022
- aa. Project Plans and Materials, January 2023
- bb. California Energy Code, Title 2022 Building Energy Efficiency Standards, 2022 <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards>

List of Permits Obtained: The following permits and/or discretionary actions will be obtained by the project applicant:

- Residential grading and building permits – State of California

Public Outreach [24 CFR 50.23 & 58.43]: One virtual design presentation meeting and one meeting related to Affordable Housing and Sustainable Communities (AHSC) projects for pedestrian and bicycle infrastructure and affordable housing improvements was held.

Cumulative Impact Analysis [24 CFR 58.32]: The proposed project is the construction of 209 multifamily apartment units that would provide housing for income qualifying tenants. The project would be located in a BMP zone. The site is owned by the State of California Housing and Community Development and has approved use of the site for affordable housing. The project would be constructed in an existing neighborhood dominated by single/multi-family and commercial uses. The residential use would replace a commercial/light-industrial use that will be demolished as part of the project. No cumulative impacts that are different from or greater than what is evaluated herein would occur as a result of the project.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

Offsite Alternative: Consideration of an offsite alternative is not warranted because no significant impacts that cannot be avoided were identified.

Reduced Project: Reducing the size of the proposed project would incrementally reduce impacts across a range of issue areas such as air quality, water supply and wastewater. However, the proposed project's impacts would not be significant in these areas so reducing the project size is not warranted. Density was maximized to ensure highest and best use of the site. Reducing the building footprint or number of units proposed is not a feasible or economically viable alternative.

No Action Alternative [24 CFR 58.40(e)]: If the proposed project was not implemented, the site would remain in its current condition. It is not known if or when another development would be proposed on the site. Without construction of the proposed project, the benefits associated with the affordable housing project would not occur.

Summary of Findings and Conclusions: Eden Housing proposes to develop the Mulberry Gardens Apartments project on a 4.07-acre site with address 2524 Mulberry Street, Riverside, Riverside County, California 92501 and comprised of two adjacent parcels (APN 209-130-003 and APN unassigned). The site is developed with an existing building used by the California Department of Forestry and Fire Protection (CalFire) as an operations facility. Existing improvements will be demolished and a new, affordable housing project will be constructed on the site in two phases.

Phase I will consist of affordable senior housing in a four-story building. A total of 59 units will be constructed: 58 one-bedroom units and one two-bedroom unit for an onsite manager. Phase II will construct a three- and four-story building containing 150 units of family housing: 73 one-bedroom units; 39 two-bedroom units; and 38 three-bedroom units. Both buildings will be rectangular in shape; the family housing building will contain two interior courtyards; a paseo will separate the buildings and also contain a small park. The project will construct a surface parking lot with 210 spaces: 60 for senior housing and 150 for the family housing portion. A total of 21 stalls will be Electric Vehicle Charging (EVC) stations.

The project site is generally flat and is not subject to unusual geological hazards. The project site is located within Flood Zone X; and thus, is not within a special flood hazard area. No adverse impacts associated with a 100-year flood event would occur. No significant air quality impacts would occur.

No historic or archaeological resources are known to be present onsite. The proposed project's northeastern facade would be exposed to noise levels that exceed HUD and City of Riverside standards. An interior noise analysis is required at the time of building permit application per Mitigation Measure NOI-1 to ensure that interior standards are met. The project would not change the existing noise environment.

The project would not adversely affect public services. The proposed project would not result in adverse effects on water or energy or generate the need for new or expanded water, wastewater, or solid waste facilities. The proposed project would increase the intensity of the use on-site; however, no traffic study is required and because it is an affordable housing project. No VMT analysis is required. No traffic impacts are anticipated. With mitigation, the project would conform to applicable Federal, State, and regional regulations affecting air emissions and hazardous materials. No mitigation is required to address impacts to water quality, cultural resources, geologic hazards and related environmental resources addressed herein.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measures and Conditions
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	MM AIR-1: Install MERV 13 filtration as part of the heating ventilation and air conditioning (HVAC) system. In addition, windows and doors shall be weatherproofed, passive

	<p>electrostatic filtration systems shall be installed and a maintenance plan for the HVAC and air filtration systems shall be prepared and adopted prior to approval of final Mechanical, Electrical and Plumbing design.</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>MM HAZ-1: Prepare a Soil Management Plan (SMP) to govern how soil disturbed during redevelopment should be characterized and managed. In brief, Avocet recommends that the SMP require that obviously stained and/or odorous soil disturbed during redevelopment be characterized and managed, as appropriate. The SMP should clearly indicate the criteria that will be used to determine whether disturbed soil can be reused onsite or must be transported offsite for disposal or recycling. The same or more conservative criteria might also be appropriate for evaluating soil, if any, to be imported to the site for redevelopment grading purposes. The SMP should also address confirmation soil sampling requirements, should obviously impacted soil be encountered and removed during site redevelopment.</p> <p>MM HAZ-2: Installation of "passive" vapor barriers beneath any future buildings as a mitigation measure for the potential accumulation of VOC vapors in indoor air. The components of the vapor barrier may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • A sand bedding ventilation layer with embedded "flat pipe" ventilation pipes connected to vertical risers. • A geomembrane of high-performance polyethylene containing an ethylene vinyl alcohol (EVOH) layer. • Spray-applied Liquid Boot®-type barrier material and • A layer of heavy-duty nonwoven geotextile to protect to protect the underlying vapor barrier during placement of the building floor slabs. <p>MM HAZ-3: Consult with a certified asbestos consultant to determine if a hazardous material survey is needed. Due to the changes in the South Coast Air Quality Management District notification requirements for Asbestos Containing Material (ACM) removal, past data and surveys may not be adequate. Furthermore, past surveys may not be complete in that all the possible ACM materials have been identified and tested.</p>

<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>MM NOI-1: An interior noise analysis shall be performed and approved by the City's Building Inspection Department upon application for a building permit. The interior noise analysis shall identify the sound transmission loss requirements for building façade elements (i.e., windows, walls, doors, and exterior wall assemblies) necessary to ensure interior noise levels do not exceed 45 dBA Ldn in habitable residential rooms. Measures may include upgrading windows and/or doors with Sound Transmission Classification (STC) ratings to 35 or higher. If the interior noise limit can be achieved only with the windows closed, the building design must include mechanical ventilation that meets CBC requirements.</p>
---	---

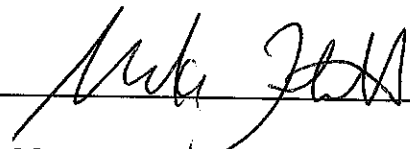
Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
 The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
 The project may significantly affect the quality of the human environment.

Preparer Signature:  Date: 6/26/2023

Name/Title/Organization: Ryan Birdseye, Principal Birdseye Planning Group

Certifying Officer Signature:  Date: 6/28/23

Name/Title: Mike Futrell, City Manager

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).