

Community Development Department Planning Division

Cultural Heritage Board Certificate of Appropriateness (CR) Staff Report

WARD: 1
AGENDA ITEM NO.:

MEETING DATE: July 21, 2010

<u>PLANNING CASE P10-0308</u>: Proposal by Gregg Maedo and Associates, Inc on behalf of Ensign Services for a Certificate of Appropriateness request for a 546 square foot addition and façade improvements to Plymouth Tower, a California Historic Register Eligible, seven-story International Style Residential building located at 3401 Lemon Street, situates on the westerly corner of Lemon and Fourth Streets in the R-1-7000 – Single-Family Residential Zone in Ward 1. **Contact Planner:** Travis Randel, Associate Planner, (951) 826-5932, trandel@riversideca.gov.

BACKGROUND/PROJECT DESCRIPTION:

Plymouth Tower is a seven-story International Style residential retirement building constructed in 1968. The building is sited so it sits closer to Lemon Street, leaving open space for parking in the rear accessed from the alley. Facing Lemon Street, the main façade is the longer side of a rectangular plan. The other long elevation faces the parking lot. These elevations consist of alternating solid walls and balconies with simple railings. The ground floor of these elevations have a row of free standing concrete piers that continue up the building. The ground floor entrance on the Lemon Street elevation is marked by a concrete overhang that shelters the entryway and is supported by the brick wall on the north side and a rectangular, brick pier on the south side.

South of the entrance on the first floor level is glazing for half of the length with a garden area obscured by a trellis at the end. North of the entrance is a single-story high solid brick wall for half of the length and at the end of the building, glazing with a rose garden in front. The sides of the building are solid, poured concrete with a line of canopied stairwells in the center. The elevations above are alternating planes of solid and void for the individual rooms.

Plymouth Tower is eligible for listing in the California Register under Criterion 3. The First Congregational Church with the Retirement Housing Foundation built Plymouth Tower three blocks from the church. The facility offers studio and one-bedroom apartments, assisted living, and nursing care. It is significant at the local level in the context of modern architecture in Riverside and is a good example of the International Style. Characteristics of the International Style reflected in the building are the glazing, simple rectangular form, and lack of ornamentation. It resembles Le Corbusier's Unite d'Habitation with its modular units, ground-floor piers and rectangular tower plan, but it is less Brutalist and more International Style. The poured-in place concrete is striated but still smooth. Overall, Plymouth Tower is an excellent example of modern tower building from the modernism theme and a rare property type in Riverside. It retains a high level of integrity, because it has only minor alterations like new corridor lighting and landscaping.

The applicant is proposing a 546 square foot addition to provide additional space for a physical therapy expansion in addition to a façade upgrade to the front exterior of the building.

The proposed addition is located just southerly of the main entrance along Lemon Street on the primary facade. The applicant is proposing to visually "push" the existing façade outward on the ground floor to provide the additional space within the building. The façade of the addition will include similar elements seen throughout the development including the vertical concrete piers, and new recessed glazing. Complimentary Wall sconces are proposed to be attached to the vertical piers. The resulting second story balcony will include new vertical railings backed by solid copper panels (to screen the necessary equipment) a material introduced elsewhere in the building as part of this project.

In addition, a new dining patio area is proposed along the Lemon and Fourth Streets; however, this area is limited to new furniture and repairing the existing low wall as needed utilizing the existing slab for seating.

As for the overall façade updates, the applicant is proposing to replace all of the existing, substandard handrails and replace with similar new aluminum handrails and safety returns to comply with current California Building Code (CBC) requirements. In addition, the applicant is proposing to repaint the building, add Teak Siding around the windows of each unit and replace the existing aluminum framed windows and doors (where appropriate) to match existing.

In addition to the façade changes and expansion noted above, the applicant is requesting a modification of the approved Conditional Use Permit (CU-020-645), approved in 1965. When approved, the project included 18 single-bedroom units, 74 In-living or Boarding Rooms, and 20 nursing care rooms with a total of 30 beds. The current proposal is to provide 18 skilled nursing 2-bed care rooms with a total of 36 beds, 66 assisted living units, and 24 independent living units as summarized below.

	Approved Units	Proposed Units	Difference
Single-Bedroom Units/Assisted	18 single-bedroom units	24 independent living	Addition of 2 units
Living Units	74 boarding care units	66 assisted living	
Skilled Nursing	30 skilled nursing beds	36 skilled nursing beds	Addition of 6 beds

A Minor Conditional Use Permit has been applied for by the applicant to modify the occupancy of the building as noted above. The Zoning Administrator is scheduled to act upon the Minor Conditional Use Permit within 5 days of CHB action. As such, this information is provided for information only and is not material to the Certificate of Appropriateness.

ANALYSIS:

Compliance with section 20.30.030 of the City of Riverside Municipal Code:

Despite the design compatibility of this project, additions to the front of historically significant buildings are typically discouraged by the Secretary of the Interior Standards and the Citywide Residential Historic District Design Guidelines. Chapter 8.6 of the Design Guidelines state that additions should "be located towards the rear or side whenever possible, away from the main façade." However, the addition does comply with other design standards which states that additions should "use similar fenestration patterns and finish materials as the original structure" and "be compatible in size and scape with the original structure, although subordinate in massing." The proposed addition is clearly subordinate to the existing building as it is limited to the first floor. Additionally, the architectural design complies with the previous statement whereby the design utilized vertical design elements to

match the existing pillars. Further, the site will maintain the asymmetrical façade as originally designed. Given the overall design of the site, with the parking at the rear, it would be impractical to construct the addition towards the rear of the building. By doing so, the parking lot area would need to be significantly redesigned resulting in a significant compromise to the overall parking provided which is already less than required per the Zoning Code. Further, it should be noted that the Zoning Administrator in reviewing the associated Minor Conditional Use Permit will be considering a variance request to allow the building addition to extend within the required 20 foot building setback.

In order to meet State Standards for physical therapy and to allow for the continued viability of this project, staff supports the proposed project, subject to the following mitigation measures.

MM CULTURAL 1: In keeping with the architectural styling of the building, the addition shall utilize vertical elements that line up with the existing vertical piers.

MM CULTURAL 2: The glazing of the new addition shall significantly resemble the existing glazing with aluminum, or other metallic, surrounds, mullions, and muntins, as appropriate to Cultural Heritage Board Staff.

In addition, a new dining area is proposed along the Lemon and Fourth streets; however, this area is limited to new furniture and repairing the existing low wall as needed. The following mitigation measure has been added to ensure compliance with the Secretary of the Interior Standards for rehabilitation.

MM CULTURAL 3: Should the existing brick prove insufficient for adaptive reuse, the applicant shall provide material samples (including original and proposed) of any new brick for Cultural Heritage Staff for review and approval prior to installing the new brick.

As for the overall façade updates, the applicant is proposing to replace all of the existing, substandard handrails and replace with similar new aluminum handrails and safety returns. In addition, the applicant is proposing to repaint the building, add Teak Siding and replace the existing aluminum framed windows and doors with new aluminum framed windows and doors (where appropriate).

MM CULTURAL 4: The façade improvements shall utilize railing similar in style, material, finish and detail to the existing railings. The railings shall be metal with an aluminum style finish that are vertical in design.

The applicant is proposing to utilize a copper backing above the new first floor addition, as well as adding it as a stepped parapet to the roof of the structure. While not an original material, the second floor copper screen is necessary to screen the new air conditioning equipment that will be utilized for the first floor addition. The screen also distinguishes both of these areas as distinct from the original construction while still being appropriate. The roof screen will serve as a necessary safety feature by providing a railing at the top of the building. The current parapet wall is approximately 6" high. Given the height of the building, the new parapet will be minimally visible from the street as it is setback from the building edge.

As noted above, the project has the potential to have a significant negative impact on the historic resource. However, with the mitigation measures provided, the project will satisfy the requirements of the Secretary of the Interior Standards, the Citywide Residential Historic District Guidelines, and Title 20 of the municipal code. As such, a less than significant impact is expected.

FACTS FOR FINDINGS: (From Section 20.30.060 of the Riverside Municipal Code)

FINDINGS: The proposed undertaking is consistent or compatible with the architectural period and the character-defining elements of the historic building.

FACTS: The project <u>complies</u> with this finding. The proposed addition and façade improvements are characteristic of the International Style by maintaining the existing vertical and horizontal elements, as well as the other character defining detailed noted above. With the inclusion of the recommended mitigation measures, the project will be consistent with the architectural period and character-defining elements of the historic building.

FINDINGS: The proposed undertaking is compatible with existing adjacent or nearby landmark structures and preservation district structures and their character-defining elements.

FACTS: The project complies with this finding. The subject site is identified as Eligible for listing in the California Register of Historic Places under Criterion 3. Criterion 3 identifies structures that "Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values." The building is unique to itself, whereby its eligibility is not dependent upon its surroundings (with the exception of the First Congregational Church located 3 blocks south of the project site). As such, any potential impacts would be limited to the building and would not affect adjacent landmark structures. However, while the project may have the potential to negatively impact the historic resource, the included mitigation measures will reduce any potential impact to a level of less than significant. As such, the project is compatible with the existing adjacent or nearby landmark structure and preservation district structures and their character-defining elements.

FINDINGS: The colors, textures, materials, fenestration, decorative features and details, height, scale, massing and methods of construction proposed are consistent with the period and/or compatible with adjacent structures.

FACTS: The project <u>complies</u> with this finding. The included mitigation measures will ensure that the project utilizes textures, materials, and features that are compatible with the International Style of architecture and therefore consistent with the period of significance.

FINDINGS: The proposed change does not destroy or adversely affect an important architectural, historical, cultural or archaeological feature or features.

FACTS: The project <u>complies</u> with this finding. The included mitigation measures will ensure that the project will not destroy or adversely affect and important architectural feature of features. The project, as conditioned is generally consistent with the Secretary of the Interior Standards, Title 20 of the Municipal Code, and the Citywide Residential Historic District Design Guidelines.

FINDINGS: Such other standards as are adopted by resolution of the Cultural Heritage Board or the City Council.

FACTS: The project <u>complies</u> with this finding. The project, as conditioned and mitigated, is consistent with all standards adopted by the Cultural Heritage Board and City Council.

RECOMMENDATION:

That the Cultural Heritage Board:

- 1. Determine that Planning Case **P10-0308** will not have a significant effect on the environment based on the findings set forth in the case record; and,
- 2. Adoption of a Negative Declaration; and,
- 3. **APPROVE** Planning Case **P10-0308**, thereby issuing a Certificate of Appropriateness for the project based on the findings outlined in the staff report and summarized in the following and subject to the recommended conditions attached.

EXHIBITS:

- 1. Location Map
- 2. Aerial Map
- 3. Site Plan
- 4. Perspective
- 5. Physical Therapy Perspective
- 6. Conceptual First Floor Plan
- 7. Existing Lemon Street Façade
- 8. Proposed Lemon Street Façade
- 9. DPR Form

RECOMMENDED CONDITIONS OF APPROVAL

Case Number: P09- MEETING DATE: July 21, 2010

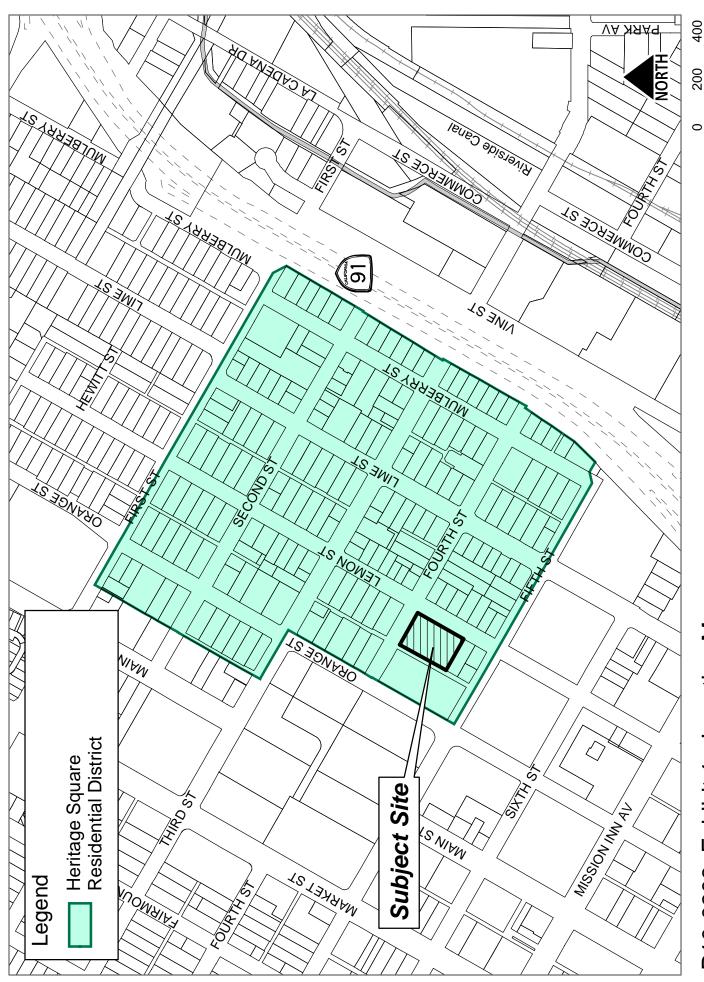
General Conditions

- The project must be complete per the Cultural Heritage Board's approval, including all
 conditions listed below. Any subsequent changes to the project must be approved by the
 Cultural Heritage Board or the Cultural Heritage Board staff. Upon completion of the project, a
 Cultural Heritage Board staff inspection must be requested to ensure that the approved plans
 have been executed and that all conditions have been implemented before OCCUPANCY hold
 can be released.
- 2. There is a fifteen calendar-day appeal period that will lapse at 5:00 p.m. on August 5, 2010. Appeals of the Board's action will not be accepted after this time.
- 3. This approval will expire in one year on July 21, 2011.

Specific Conditions of Approval and Mitigation Measures

- 4. MM CULTURAL 1: In keeping with the architectural styling of the building, the addition shall utilize vertical elements that line up with the existing vertical piers.
- 5. MM CULTURAL 2: The glazing of the new addition shall significantly resemble the existing glazing with aluminum, or other metallic, surrounds, mullions, and muntins, as appropriate to Cultural Heritage Board Staff.
- 6. MM CULTURAL 3: Should the existing brick prove insufficient for adaptive reuse, the applicant shall provide material samples (including original and proposed) of any new brick for Cultural Heritage Staff for review and approval prior to installing the new brick.
- 7. MM CULTURAL 4: The façade improvements shall utilize railing similar in style, material, finish and detail to the existing railings. The railings shall be metal with an aluminum style finish that are vertical in design.

G:\CHB\2010-CHB\07-21-2010\P10-0308.rtr.doc Travis Randel



P10-0308, Exhibit 1 - Location Map

Feet



P10-0308, Exhibit 2 - 2008 Aerial Photo

BUILDING DATA

PROJECT DESCRIPTION:
LOBY REMODEL HYSICAL HERAPY REMODEL & ADDITION,
DINING PAIN ADDITION, OUTDOOR PHYSICAL HERAPY PAILO
ADDITION & LANDSCAPE REMODEL.

3401 LEMON STREET RIVERSIDE, CA 92501 (951) 686-8202 ADDRESS:

1-2. SKILLED NURSING FACILITY (LEVEL 2) 1-1 ASSISTED LIVING FACILITY (LEVELS 3-5) R-2. INDEPENDENT LIVING (LEVELS 6-7) OCCUPANCY:

LICENSED BEDS:

18 SKILLED NURSING 2-BED CARE UNITS (LEVEL 2)
66 ASSISTED LYNING STUDIO UNITS (LEVELS 2-5)
67 MODEPHORN LIVING STUDIO UNITS (LEVELS 4-7)
70 INDEPENDENT LIVING STUDIO SINGLE BEDROOM UNITS (LEVELS 4-7)

TYPE 1, FULLY FIRE SPRINKLED CONSTRUCTION:

34.173 SF = .784 ACRES PARKING: SIZE: LOT

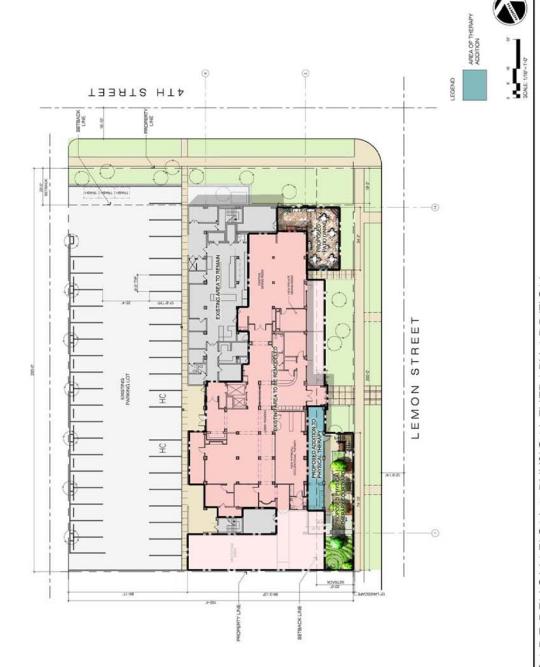
OF STORIES:

38 SPACES TOTAL 36 STANDARD SPACES 2 ADA SPACES

ADDITION: 546 SF GROSS RENOVATION: 5,294 SF GROSS AREAS:

VICINITY MAP





FACADE RENOVATION & PHYSICAL THERAPY ADDITION

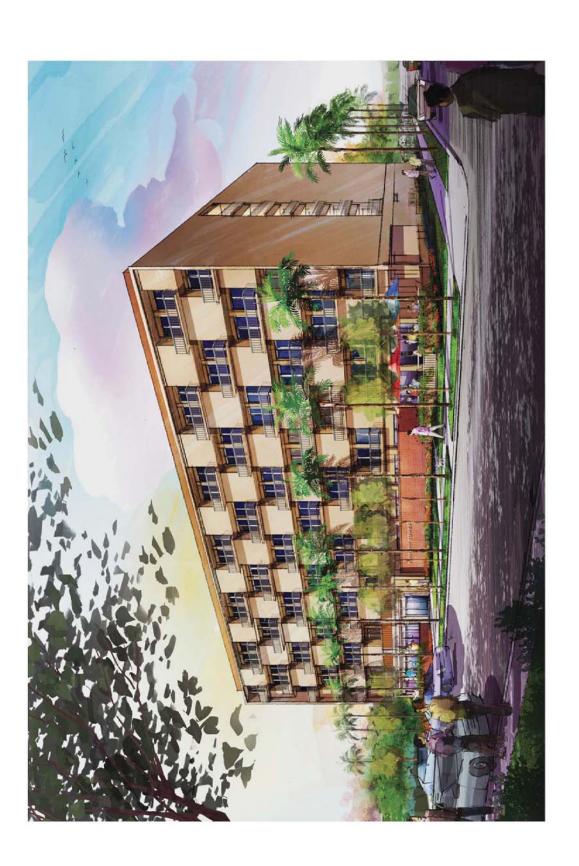
PLYMOUTH TOWER CARE AND LIVING CENTER

3401 LEMON STREET RIVERSIDE, CA 92501



P10-0308, Exhibit 3 - Site Plan

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FACADE RENOVATION & PHYSICAL THERAPY ADDITION

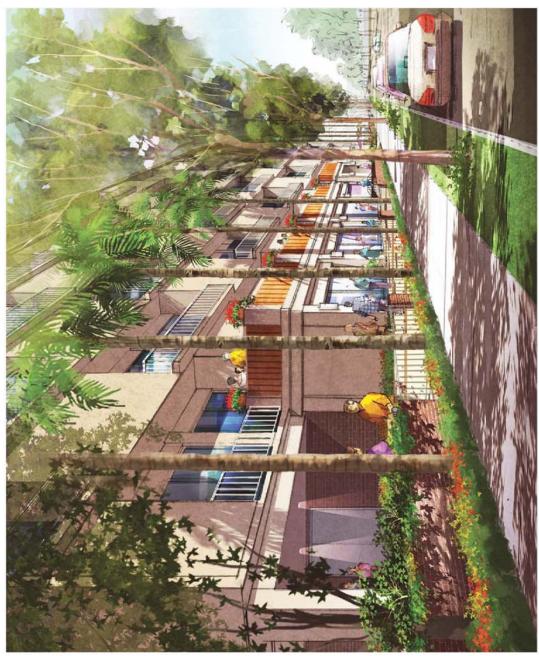
PLYMOUTH TOWER CARE AND LIVING CENTER

3401 LEMON STREET RIVERSIDE, CA 92501



PROPOSED LEMON STREET PERSPECTIVE

ENSIGN S GROUP



Located walking distance from the Historic Mission Inn in beautiful downtown Riverside, Plymouth Tower Care and Living Center is one of the few unique places that offer three levels of accommodations to provide a continuum of care for the residents, the facility not only provides exceptional care for their residents, they also offer a wide variety of supportive services to promote the mental, spiritual, social, and physical well-being of those within the community.

Upon Ensign Group's procurement of Plymouth Tower, an extensive remodel of the facility was planned and currently underway that will truly enhance the quality of life for the residents and the local community.

Part of this plan to enrich the quality of environment for the residents, a Physical Therapy Addition and Outdoor Therapy Courtyard were proposed along with an Outdoor Dining Area and a Façade Renovation.

Since Plymouth Tower is eligible for listing in the California Register as having historical significance, great care was put into the design to either maintain or complement the essential characteristics of the International/Mid Century Style.

New paint scheme, replacement of existing railing with similar clean lines and the addition of teak was proposed for the façade renovation. The teak siding application and darker brown at the resident room balconies further accentuate the solid/void effect while the lighter brown unifies the building to read as one rectangular mass.

The much needed Physical Therapy Addition balances out the existing high brick wall to the north of the entry while still maintain the asymmetrical tradition of the International Style. The row of free-standing concrete piers echo the regularity of the existing piers that wrap the ground floor of this building and is carefully aligned to visually continue up the building to match the intent of the original structure.

Low brick walls with aluminum railing delineate the physical therapy and outdoor dining courtyards. It offers a secure place for the residents to enjoy some fresh air and promotes interaction with the neighbors and encourages pedestrian activity.

We sincerely feel the proposed addition and renovation will have a positive impact to the surrounding neighborhood and will blend in well with city fabric.

Thank you for your consideration.

FACADE RENOVATION & PHYSICAL THERAPY ADDITION

PROPOSED PHYSICAL THERAPY PERSPECTIVE

PLYMOUTH TOWER CARE AND LIVING CENTER

3401 LEMON STREET RIVERSIDE, CA 92501

ENSIGN GROUP

P10-0308, Exhibit 5 -Physical Therapy Perspective





PROPOSED CONCEPTUAL FLOOR PLAN

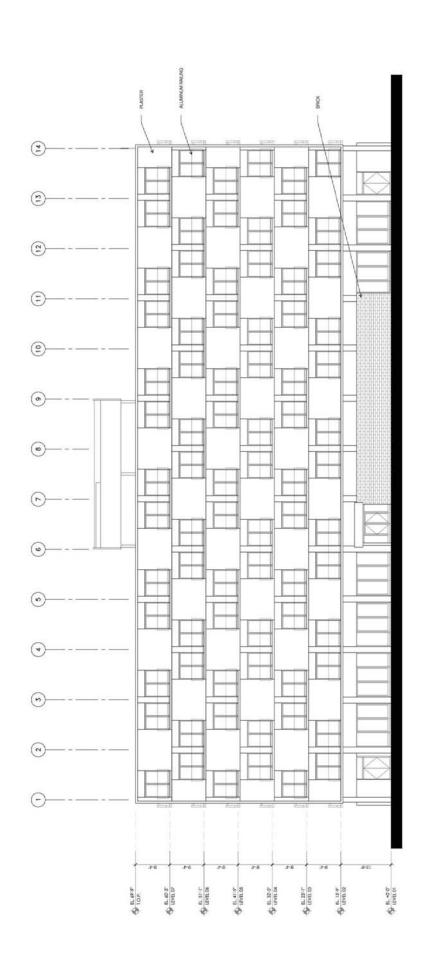
FACADE RENOVATION & PHYSICAL THERAPY ADDITION

PLYMOUTH TOWER CARE AND LIVING CENTER

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3401 LEMON STREET RIVERSIDE, CA 92501







PLYMOUTH TOWER CARE AND LIVING CENTER FACADE RENOVATION & PHYSICAL THERAPY ADDITION

ENSIGN SGROUP

3401 LEMON STREET RIVERSIDE, CA 92501



P10-0308, Exhibit 7 - Existing Lemon Street Facade



FACADE RENOVATION & PHYSICAL THERAPY ADDITION

PLYMOUTH TOWER CARE AND LIVING CENTER

3401 LEMON STREET RIVERSIDE, CA 92501





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State of California & The Resources Agency
DEPARTMENT OF PARKS AND RECREATION HRI#

BUILDING, STRUCTURE, AND OBJECT RECORD

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Primary #



Community Development Department Planning Division

Draft Negative Declaration

AGENDA ITEM NO.:

WARD: 1

1. **Case Number:** P09-0673 (MCUP) and P10-0308 (Certificate of Appropriateness)

2. **Project Title:** Plymouth Tower Care and Living Center

3. **Hearing Date:** July 21, 2010

4. **Lead Agency:** City of Riverside

Community Development Department

Planning Division

3900 Main Street, 3rd Floor Riverside, CA 92522

5. **Contact Person:** Travis Randel, Associate Planner

Phone Number: (951) 826-5932

6. **Project Location:** 3401 Lemon Street

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

Gregg Maedo and Associates, Inc

(714) 937-1985

321 N. Rampart Street, Suite 101

Orange, CA 92868

8. **General Plan Designation:** DSP – Downtown Specific Plan

9. **Zoning:** DSP-RES-SP-CR – Downtown Specific Plan, Residential District, Cultural Resrouces Overlay Zone

10. **Description of Project:**

Plymouth Tower is a seven-story International Style residential retirement building constructed in 1968. The building is sited so it sits closer to Lemon Street, leaving open space for parking in the rear accessed from the alley. Facing Lemon Street, the main façade is the longer side of a rectangular plan. The other long elevation faces the parking lot. These elevations consist of alternating solid walls and balconies with simple railings. The ground floor of these elevations have a row of free standing concrete piers that continue up the building. The ground floor entrance on the Lemon Street elevation is marked by a concrete overhang that shelters the entryway and is supported by the brick wall on the north side and a rectangular, brick pier on the south side.

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

Adjacent Existing Land Use:

North: Single-Family Residential East: Single-Family Residential South: Single-Family Residential

West: Public Facilities – Municiple Services

Adjacent zoning:

North: DSP – RES – SP – CR – Downtown Specific Plan, Residential Distrcit, Cultural Resources Overlay East: DSP – RES – SP – CR – Downtown Specific Plan, Residential Distrcit, Cultural Resources Overlay South: DSP – RES – SP – CR – Downtown Specific Plan, Residential Distrcit, Cultural Resources Overlay West: DSP – RES – SP – CR – Downtown Specific Plan, Residential Distrcit, Cultural Resources Overlay

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

a. California Department of Human Services (Skilled Nursing)

13. Documents used and/or referenced in this review:

- a. General Plan 2025
- b. GP 2025 FPEIR

14. Acronyms

AQMP - Air Quality Management Plan AUSD - Alvord Unified School District CDG - Citywide Design Guidelines

CEQA - California Environmental Quality Act

CMP - Congestion Management Plan
EMWD - Eastern Municipal Water District
EOP - Emergency Operations Plan

FEMA - Federal Emergency Management Agency

FPEIR - GP 2025 Final Programmatic Environmental Impact Report

GIS - Geographic Information System

GP 2025 - General Plan 2025

LHMP - Local Hazard Mitigation Plan

MARB/MIP - March Air Reserve Base/March Inland Port

MJPA-JLUS - March Joint Powers Authority - Joint Land Use Study

MSHCP - Multiple-Species Habitat Conservation Plan
MVUSD - Moreno Valley Unified School District
NCCP - Natural Communities Conservation Plan

OEM - Office of Emergency Services

RCALUC - Riverside County Airport Land Use Commission
RCALUCP - Riverside County Airport Land Use Compatibility Plan

RCP - Regional Comprehensive Plan

RCTC - Riverside County Transportation Commission

RMC - Riverside Municipal Code
RPD - Riverside Police Department
RPU - Riverside Public Utilities
RPW - Riverside Public Works
RTP - Regional Transportation Plan
RUSD - Riverside Unified School District

SCAG - Southern California Association of Governments
SCAQMD - South Coast Air Quality Management District

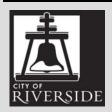
SKR-HCP - Stephens' Kangaroo Rat - Habitat Conservation Plan

SWPPP - Storm Water Pollution Prevention Plan

USGS - United States Geologic Survey
WMWD - Western Municipal Water District
WQMP - Water Quality Management Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

	below would be potentially affected but Impact" as indicated by the checklish		ist one		
Aesthetics	Agriculture & Forest Resources	Air Quality			
Biological Resources	Cultural Resources	Geology/Soils			
Greenhouse Gas Emissions	Hazards & Hazardous Materials	Hydrology/Water Quality			
Land Use/Planning	Mineral Resources	Noise			
Population/Housing	Public Service	Recreation			
Transportation/Traffic	Transportation/Traffic Utilities/Service Systems Mandatory Findings of Significance				
DETERMINATION: (To be comple	ted by the Lead Agency)				
On the basis of this initial evaluatio recommended that:	n which reflects the independent jud	gment of the City of Riversid	e, it is		
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 prop ENVIRONMENTAL IMPACT REPORT	osed project MAY have a significant effer is required.	ect on the environment, and an			
significant unless mitigated" impact on than earlier document pursuant to applical	osed project MAY have a "potentially sign e environment, but at least one effect 1) hable legal standards, and 2) has been added on attached sheets. An ENVIRONME cts that remain to be addressed.	as been adequately analyzed in ressed by mitigation measures			
because all potentially significant effects DECLARATION pursuant to applicable s	the proposed project could have a signific s (a) have been analyzed adequately in a standards, and (b) have been avoided or m including revisions or mitigation measured.	in earlier EIR or NEGATIVE itigated pursuant to that earlier			
Signature		Date			
Printed Name & Title		For <u>City of Riverside</u>			



Community Development Department Planning Division

Environmental Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 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.
- 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).
- 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 with in 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.

IS	SUES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact
IN	FORMATION SOURCES):	Impact	Unless	Impact	impuct
	,		Mitigation Incorporated		
1.	AESTHETICS. Would the project:				
	a. Have a substantial adverse effect on a scenic vista?				\boxtimes
	1a. Response: (Source: General Plan 2025 Figure CCM-4 – Figure 5.1-1 – Scenic and Special Boulevards and Parkwe Table 5.1-B – Scenic Parkways)				
Ger sign His rev Gu	e project site is not located adjacent to a scenic boulevard, so neral Plan. The proposed project will have a minor visual nificant changes made to the first floor area. As noted above storic Building and represents a good example of International iewed for compliance with Title 20 of the Municipal Code, idelines, and the Secretary of the Interior Standards. Additional Resources Section, Section 5, of this initial study.	thange from the project of Architecture The Citywid	n the existing site is identifi ral Style. As le Residential	g structure we ed as a Califo such, the pro Historic Dis	ith the most ornia Eligible ject has been tricts Design
	b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
	19 – Article V – Chapter 19.100 – Residential Zones - RC 2 addition to response 1a above, the project site is not located weeted.		any state sce	nic highway.	No impact is
	c. Substantially degrade the existing visual character or quality of the site and its surroundings?				
	1c. Response: (Source: General Plan 2025, General Plan 2 Guidelines, Heritage Square Historic District, and Downto			Citywide Des	ign and Sign
His con the	e project site is located within the Heritage Square Historic toric Building. As further explained in Section 5 of this appliance with Title 20 of the Municipal Code, The Citywide I Secretary of the Interior Standards. No impacts are expected or its surroundings.	s initial stud Residential H	y, the projectistoric Distric	et has been ets Design Gu	reviewed for idelines, and
	d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				
	1d. Response: (Source: General Plan 2025, General Plan 202 Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, (Historic District, and Downtown Specific Plan)				
sco	e project site is existing and no significant changes are proposed to be added. These 6 wall lights are not adversely affect the day or night view in the area.				

		JES (AND SUPPORTING ORMATION SOURCES):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
2.	A	GRICULTURE AND FOREST RESOURCES:				
	sig Ca Me as an res eff Ca reg Fo As	determining whether impacts to agricultural resources are gnificant environmental effects, lead agencies may refer to the diffornia Agricultural Land Evaluation and Site Assessment odel (1997) prepared by the California Dept. of Conservation an optional model to use in assessing impacts on agriculture d farmland. In determining whether impacts to forest sources, including timberland, are significant environmental fect, lead agencies may refer to information complied by the diffornia Department of Forestry and Fire Protection garding the state's inventory of forest land, including the prest and Range Assessment Project and the Forest Legacy steeps and the forest carbon measurement ethodology provided in the Forest Protocols adopted by the diffornia 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?				
	e pr	Response: (Source: General Plan 2025 – Figure OS-2 – A Appendix I – Designated Farmland Table roject involves minor renovations to a fully developed, m impacts expected to occur on any agricultural or forest res	ultiple-family	·		
	b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
	e pr	Response: (Source: General Plan 2025 – Figure OS-3 - W Figure 5.2-4 – Proposed Zones Permitting Agricultural Use roject involves minor renovations to a fully developed, m impacts expected to occur on any agricultural or forest res	es, and Title 1 ultiple-family	9)		
uic	110	impacts expected to occur on any agricultural or forestres	our ces.			
	c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526)?				
	2c.	Response: (Source: GIS Map – Forest Data)				
	_	roject involves minor renovations to a fully developed, m impacts expected to occur on any agricultural or forest res		residential r	mid-rise struc	cture. There

	UES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact
INF	ORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	ппрасс
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
2d.	Response: (Source: GIS Map – Forest Data)				
See res	sponse 2a-2c above.				
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?				\boxtimes
	Response: (Source: General Plan – Figure OS-2 – Agricu Preserves, General Plan 2025 FPEIR – Appendix I – Desig 19.100 – Residential Zones – RC Zone and RA-5 Zone and sponse 2a-2c above.	nated Farml	and Table Titl		
3. A]	IR QUALITY.				
Wl app dis	here available, the significance criteria established by the plicable air quality management or air pollution control strict may be relied upon to make the following terminations. Would the project:				
a.	Conflict with or obstruct implementation of the applicable air quality plan?			\boxtimes	
The pr existing existing and will any ap	Response: (Source: South Coast Air Quality Manager (AQMP)) roposed project will result in several façade changes, includ grailings, windows and doors, as well as other minor alterage buildings may be raised, and new construction on vacant ll not result in any significant air borne emissions. As such plicable air quality plans, violate any air quality standards ted air quality violation including cumulatively considerable and	ing a 546 squations. Unlik land, the pro , the project , or contribu	are foot addi e significant r oposed project will not obstr te substantiall	tion, replacen redevelopmen t is very limit uct the imple ly to an existi	nent of at where ed in scale mentation of ng or
	·				
expecte					
b. 3b.	Violate any air quality standard or contribute substantially			A Regional	

ISSUES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	impact
2007 Model, EMFAC 2007 Model)		incorporateu		
,				
See response 3a above.				
d. Expose sensitive receptors to substantial pollutant concentrations?				
3d. Response: (Source: General Plan 2025 FPEIR Tal Thresholds, South Coast Air Quality Management Distri 2007 Model, EMFAC 2007 Model)				
In addition to response 3a above, the project will result in a min also known as Reactive Organic Compounds [ROC]) consiste However, given the relatively small size of the project, the pro- substantial pollutant concentrations or objectionable odors. A le	ent with the ject is not ex	architectural pected to exp	coating of toose sensitive	the building.
e. Create objectionable odors affecting a substantial number of people?				
3e. Response:				
See response 3d above.				
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 Game or U.S. Fish and Wildlife Service?				
4a. Response: (Source: General Plan 2025 - Figure OS-6 - St				
Habitat Conservation Plans (HCP), Figure OS-7 – MSHO Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Criteria Area Species Survey Area, Figure 5.4-8 – MSHCI	Area Plans, I Plant Specie	Figure 5.4-4 - es Survey Arec	MSHCP Crite a, Figure 5.4	eria Cells and
The project site is fully developed as a multiple-family fare care hardscape, and landscaping. There is no native vegetation remalocation in an area currently covered in hardscape. As such, thabitat, the disturbance of existing habitat, contribute to the species, or effect riparian or riverine habitat given than none calandscaping is proposed to remain as is, and/or repaired and replacements.	nining on the he project wi detriment of of these exist	site. Further ill not result if candidate, s on the site.	the propose in the remove ensitive, or s All of the exi	ed addition is al of existing pecial status
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 Game or U.S. Fish and Wildlife Service?				
4b. Response: (Source: General Plan 2025 – Figure OS-6 – St Habitat Conservation Plans (HCP), Figure OS-7 – MSH	_			

	JES (AND SUPPORTING ORMATION SOURCES):	Potentially Significant Impact	Potentially Significant Unless Mitigation	Less Than Significant Impact	No Impact
	Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Criteria Area Species Survey Area, Figure 5.4-8 – MSHC - Protection of Species Associated with Riparian/Riverine A	Plant Specie P Burrowing	es Survey Are Owl Survey A	a, Figure 5.4	-7 – <i>MSHCP</i>
See res	ponse 4a above.				
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
4c.	Response: (Source: City of Riverside GIS/CADME USGS	Quad Map L	ayer)		
In addi	tion to response 4a above, no wetlands, vernal pools, coast	al areas, etc.	exist on the si	te. No impac	t is expected.
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?				
	Response: (Source: MSHCP, General Plan 2025 – Figure ponse 4a-4c above.		CP Cores and	Linkage)	
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
4e.	Response: (Source: MSHCP, Title 16 Section 16.72.040 - Mitigation Fee, Title 16 Section 16.40.040 - Establishing Riverside Urban Forest Tree Policy Manual)				
See res	ponse 4a-4c above.				
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?				
4f.	Response: (Source: MSHCP, General Plan 2025 – Figure and Other Habitat Conservation Plans (HCP), Stephen Mathews Multiple Species Habitat Conservation Plan a Sobrante Landfill Habitat Conservation Plan)	s' Kangaroo	Rat Habitat	Conservation	Plan, Lake
See res	ponse 4a-4c above.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Potentially Significant Unless Mitigation	Less Than Significant Impact	No Impact
		Incorporated		
5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				

⁵a. Response: (Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code)

Plymouth Tower is a seven-story International Style residential retirement building constructed in 1968. The building is sited so it sits closer to Lemon Street, leaving open space for parking in the rear accessed from the alley. Facing Lemon Street, the main façade is the longer side of a rectangular plan. The other long elevation faces the parking lot. These elevations consist of alternating solid walls and balconies with simple railings. The ground floor of these elevations have a row of free standing concrete piers that continue up the building. The ground floor entrance on the Lemon Street elevation is marked by a concrete overhang that shelters the entryway and is supported by the brick wall on the north side and a rectangular, brick pier on the south side.

South of the entrance on the first floor level is glazing for half of the length with a garden area obscured by a trellis at the end. North of the entrance is a single-story high solid brick wall for half of the length and at the end of the building, glazing with a rose garden in front. The sides of the building are solid, poured concrete with a line of canopied stairwells in the center. The elevations above are alternating planes of solid and void for the individual rooms.

Plymouth Tower is eligible for listing in the California Register under Criterion 3. The First Congregational Church with the Retirement Housing Foundation built Plymouth Tower three blocks from the church. The facility offers studio and one-bedroom apartments, assisted living, and nursing care. It is significant at the local level in the context of modern architecture in Riverside and is a good example of the International Style. Characteristics of the International Style reflected in the building are the glazing, simple rectangular form, and lack of ornamentation. It resembles Le Corbusier's Unite d'Habitation with its modular units, ground-floor piers and rectangular tower plan, but it is less Brutalist and more International Style. The poured-in place concrete is striated but still smooth. Overall, Plymouth Tower is an excellent example of modern tower building from the modernism theme and a rare property type in Riverside. It retains a high level of integrity, because it has only minor alterations like new corridor lighting and landscaping.

The applicant is proposing a 546 square foot addition to provide additional space for a phyiscal therapy expansion in addition to a façade upgrade to the front exterior of the building.

The proposed addition is located just southerly of the main entrance along Lemon Street on the primary facade. The applicant is proposing to visually "push" the existing façade outward on the ground floor to provide the additional space within the building. The façade of the addition will include similar elements seen throughout the development including the vertical concrete piers, and new recessed glazing. Complimentary Wall sconces are proposed to be attached to the vertical piers. The resulting second story balcony will include new vertical railings backed by solid copper panels (to screen the necessary equipment) a material introduced elsewhere in the building as part of this project.

In addition, a new dining patio area is proposed along the Lemon and Fourth Streets; however, this area is limited to new furniture and repairing the existing low wall as needed utilizing the existing slab for seating.

As for the overall façade updates, the applicant is proposing to replace all of the existing, substandard handrails and replace with similar new aluminum handrails and safety returns to comply with current California Building Code (CBC) requirements. In addition, the applicant is proposing to repaint the building, add Teak Siding around the windows of each unit and replace the existing aluminum framed windows and doors (where appropriate) to match existing.

	SUES (AND SUPPO FORMATION SO		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact	
In addition to the façade changes and expansion noted above, the applicant is requesting a modification of the approved Conditional Use Permit (CU-020-645), approved in 1965. When approved, the project included 18 single-bedroom units, 74 In-living or Boarding Rooms, and 20 nursing care rooms with a total of 30 beds. The current proposal is to provide 18 skilled nursing 2-bed care rooms with a total of 36 beds, 66 assisted living units, and 24 independent living units as summarized below.							
		Approved Units	Propose	d Units	Diffe	rence	
	Single-Bedroom	18 single-bedroom units	24 independ	dent living	A 1124	. 6.2	
	Units/Assisted Living Units	74 boarding care units	66 assiste	ed living	- Addition	of 2 units	
	Skilled Nursing	30 skilled nursing beds	36 skilled n	ursing beds	Addition of 6 beds		
with Star thar	noted above, the project has the in the mitigation measures prondards, the Citywide Residential significant impact is expected b. Cause a substantial adverse	vided, the project will satisfy al Historic District Guidelines	the require	ments of the	Secretary of	the Interior	
	archeological resource pursi	ant to § 15064.5?					
 5b. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D - Cultural Resources Study) There are no known archeological or paleontological resources on the project site. Additionally, given that the project site is fully developed, any archeological resources would have been uncovered during the original construction of the building. Finally, given the relatively small scale of the project, and changes to the surrounding soil will be minimal including the clearing of existing sidewalk and re-grading of the 546 square foot addition location. A less than significant impact is expected. 							
	c. Directly or indirectly des resource or site or unique ge	troy a unique paleontological cologic feature?					
	5c. Response: (Source: General response 5b above.	al Plan 2025 Policy HP-1.3)					
	d. Disturb any human rema outside of formal cemeteries	nins, including those interred					
	5d. Response: (Source: GP 20 Cultural Resources Sensitiv		haeological S	ensitivity and	Figure 5.5-2	- Prehistoric	
See	response 5b above.						
6.	GEOLOGY AND SOILS Would the project:	•					
	effects, including the ris	to potential substantial adverse sk of loss, injury, or death					
		rthquake fault, as delineated on Priolo Earthquake Fault Zoning					

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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.				

6i. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Report)

The City of Riverside is located within Southern California which is a region that is seismically active. However, no known faults exist within the City limits. Three known earthquake faults are located within 15 miles of the City including portions of the San Andreas (11 miles from Downtown Riverside), San Jacinto (7 miles from Downtown Riverside), and the Elsinore Fault lines (13 miles from Downtown Riverside),. The proximity to these known faults will subject the City to various levels of seismic activity. It is estimated that the San Andreas fault is capable of generating an 8.3 magnitude (M) earthquake while the San Jacinto fault has the capacity to generate a 7.0M earthquake and the Elsinore fault is capable of producing a 6.0M earthquake.

People and structures in the Planning Area are subject to risks from the hazards associated with earthquakes. Seismic activity poses two types of hazards: primary and secondary. Primary hazards include ground rupture, ground shaking, ground displacement, and subsidence and uplift from earth movement. Primary hazards can induce secondary hazards such as ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (tsunamis and seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires. Potential seismic hazards affecting the Planning Area include ground shaking, ground failure, and liquefaction.

Seismic shaking is the geological hazard that has the greatest potential to severely impact the project area, given that the area is located near several significant faults that have the potential to cause moderate to large earthquakes. According to Geotechnical Report, prepared by Wilson Geosciences, Inc., the City of Riverside could experience ground acceleration greater than 35 to 43 percent. These probabilistic ground motion values for the City are within the limits for current structural design (CBC/UBC) for non-critical structures, including most residential, commercial, and industrial buildings.

The major geologic hazards associated with ground shaking include liquefaction and ground failure. Liquefaction occurs when ground shaking causes water-saturated soils to become fluid and lose strength. Liquefaction historically has been responsible for significant damage, creating problems with bridges, buildings, buried pipes and underground storage tanks. The City is underlain by areas susceptible to varying degrees of liquefaction, ranging from moderate to very high. Liquefaction hazards are particularly significant along watercourses. The primary liquefaction areas are within the City limits including the area along the Santa Ana River, a broad area south and west of the Riverside Municipal Airport, a portion in western Riverside spanning La Sierra Avenue and a smaller area along the City's southern boundary. The project site is identified as having a low liquefaction potential.

Strong ground motions can also worsen existing unstable slope conditions, particularly if coupled with saturated ground conditions. Seismically induced landslides and rockfalls would be expected in the northeastern area associated with the Box Springs Mountain, the southern and southwestern areas associated with the Cajalco Ridge and La Sierra Hills, the western area associated with the Norco Hills and at Mt. Rubidoux adjacent to the Santa Ana River in the event of a major earthquake or human activity. Factors contributing to the stability of slopes include slope height and steepness, engineering characteristics of the earth materials comprising the slope, and intensity of ground shaking. It is estimated that a ground acceleration of at least 0.10 g in steep terrain is necessary to induce earthquake-related rockfalls, although exceeding this value does not guarantee that rockfalls will occur. Because there are several faults capable of generating peak ground accelerations of over 0.10 g in Riverside County, there is a high potential for seismically induced rockfalls and landslides to occur. The areas of high susceptibility to seismically induced landslides and rockfalls correspond to steep slopes in excess of 30 percent.

The project site is relatively flat with an average existing slope of 1.77%. As such, the project site will not be subject to landslides or unstable soil conditions.

ISSU	JES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact	
INF	ORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	Ппрасс	
Expansive soils are soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. When these soils swell, the change in volume exerts significant pressures on loads that are placed on them. This shrink/swell movement can adversely affect building foundations, often causing them to crack or shift, with resulting damage to the buildings they support. The project site is identified as not having a high shrink-swell capacity.						
As such	, a less than significant impact is expected.					
	ii. Strong seismic ground shaking?			\boxtimes		
	6ii. Response: (Source: General Plan 2025 FPEIR Appen	dix E – Geote	echnical Repo	rt)		
See resi	ponse 6ai above.					
300 105	iii. Seismic-related ground failure, including liquefication?			\square		
See res	6iii. Response: (Source: General Plan 2025 Figure PS-1 Zones, General Plan 2025 FPEIR Figure PS-3 – Soils Geotechnical Report)					
	iv. Landslides?					
6iv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix E – Geotechnical Report, Title 18 – Subdivision Code, Title 17 – Grading Code) See response 6ai above.						
b.	Result in substantial soil erosion or the loss of topsoil?					
	Response: (Source: General Plan 2025 FPEIR Figure 5. Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code ponse 6ai above.			Steep Slope, F	igure 5.6-4 –	
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?					
6c. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report)						
See res _j	ponse 6ai above.					
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?					
6d.	Response: (Source: General Plan 2025 FPEIR Figure 5 Types, Figure 5.6-5 – Soils with High Shrink-Swell Potenti					

ISSUES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	Impact
Building Code as adopted by the City of Riverside and so	et out in Title 16	of the Riversia	le Municipal	Code)
See response 6ai above.				
e. Have soils incapable of adequately supporting the use septic tanks or alternative waste water disposal syste where sewers are not available for the disposal of wa water?	ms			
6e. Response: (Source: General Plan 2025 FPEIR Figure	5.6-4 – Soils, Ta	ble 5.6-B - So	il Types.	
The project site will continue to be served by City Sewer. No I	mpact is expect	ed.		
				Γ
7. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly indirectly, that may have a significant impact on environment?				
7a. Response:	1	<u>.l</u>		
2020 as stated in AB 32 and an 80 percent reduction in G Executive Order S-3-05. As the proposed improvements ar improvements are expected to be far lower than the SCAQN will have no impact with respect to GhG emissions. b. Conflict with any applicable plan, policy or regulation of	re minimal in n ID thresholds for	ature, emissio	ons resulting	from tenant
agency adopted for the purpose of reducing the emissions greenhouse gases?	of			
7b. Response:				
Projects that are consistent with the projections of employme California Association of Governments (SCAG) are considered these forecast numbers were used by SCAG's modeling section activities such as the Regional Transportation Plan (RTP Improvement Program (RTIP), and the Regional Housing P employment and population forecasts identified by the Southwhich are consistent with the General Plan 2025 "Typical Greeneral Plan 2025 it is also consistent with the AQMP. The pindirectly and cumulatively to the implementation of an air quantum consistent with the AQMP.	ed consistent with to forecast travel, the SCAQM lan. This projecthern California owth Scenario."	th the AQMP vel demand ar ID's AQMP, ect is consisted Association Since the pro-	growth project air quality Regional Trust with the pof Government is consistent to the properties of the project is consistent air quality and the project is consistent is consistent air quality and the project is consistent air quality are project is consistent air quality and the project air quality are project air quality air quality are	ections, since for planning cansportation projections of ents (SCAG) stent with the
8. 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 hazardo materials?				\boxtimes
8a. Response: (Source: General Plan 2025 Public Safety Code, Title 49 of the Code of Federal Regulations, Cal	lifornia Building	g Code, Rivers	ide Fire Depa	artment EOP,

ISSU	JES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact	
INF	ORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	Ппрасс	
The proposed project does not involve the transport, use, or disposal of any hazardous material. As such, the project will have no impact related to the transport, use, or disposal of any hazardous material either 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?					
8b.	Response: (Source: General Plan 2025 Public Safety Eld Health and Safety Code, Title 49 of the Code of Fede Riverside's EOP, 2002 and Riverside Operational Area Strategic Plan)	eral Regulation	ons, Californi	ia Building C	Code, City of	
directly	oposed project does not involve the use of any hazardous y, indirectly or cumulatively for creating a significant ably foreseeable upset and accident conditions involvement.	hazard to th	e public or	the environn	ent through	
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?					
8c.	Response: (Source: General Plan 2025 Public Safety and CalARP RMP Facilities in the Project Area, Figure 5.13-Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Boundaries, California Health and Safety Code, Title 49 of Code)	-2 – RUSD B Schools, Fig	oundaries, Ta gure 5.13-4	ble 5.13-D RU – Other Sci	USD Schools, hool District	
will ha	oposed project does not involve any emission or handling we no impact regarding emitting hazardous emissions or l nces, or waste within one-quarter mile of an existing or pro-	handling haz	ardous or act	itely hazardo	us materials,	
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?					
8d.	Response: (Source: General Plan 2025 Figure PS-5 – Ho CERCLIS Facility Information, Figure 5.7-B – Regulate EnviroStor Database Listed Sites)		,			
project	ew of hazardous materials site lists compiled pursuant to site is not included on any such lists. Therefore, the proj to the public or environment directly, indirectly or cumul	ect would ha				
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 for people residing or working in the project area?					
8e.	Response: (Source: General Plan 2025 Figure PS-6 - A and March Air Reserve Base/March Inland Port Com					

ISSUES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact
INFORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	Impact
Compatible Use Zone Study for March Air Reserve Base (August 2005)			
All airports, public and private, with influence area over the Citsafety and/or airport compatibility zones as depicted on Figure 5 that the project site is located outside of the Riverside County zones, which places no limitation on densities. The propose Compatibility Plan. Therefore, the project will have no impact working in the project area directly, indirectly or cumulatively.	5.7-2 of the Ge Airport Lan d project is	eneral Plan 20 d Use Compa consistent wi	25 Program l tibility Plan th the Airpo	FPEIR found (RCALUCP) rt Land Use
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing o working in the project area?				
8f. Response: (Source: General Plan 2025 Figure PS-6 – A March Air Reserve Base/March Inland Port Compre Compatible Use Zone Study for March Air Reserve Base (hensive Land			
There are no private airstrips within the City. Therefore, the pr for people residing or working in the project area directly, indir-			esulting in a s	afety hazard
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
8g. Response: (Source: GP 2025 FPEIR Chapter 7.5.7 – Haz EOP, 2002 and Riverside Operational Area – Multi-Jurisa Plan)				
The City of Riverside has developed an extensive Emerger Management Office. The City's Fire Department promotes a communication for emergency planning and response mare Emergency Management System (SEMS) as well as establishing provides policies to identify methods of implementing the emergency the proposed project is consistent with the General Functional Emergency Compliance with the Emergency Operations Plan, impless than significant.	high level of agement three emergency plan. Plan 2025 and	of multi-jurise rough activati vacuation rou With continu I consistent w	dictional coopion of the Steel tes. The General course of the steel the steel test of the steel test o	peration and Standardized eral Plan also e SEMS and Plan policies
h. Expose people or structures to a significant risk of loss injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				
8h. Response: (Source: General Plan 2025 Figure PS-7 - Riverside Operational Area - Multi-Jurisdictional LHMP,				
The proposed project is located in an urbanized area where proximity or adjacent to the area in which the project is propose				
9. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge			\boxtimes	

ISSUES (AND SUPPORTING		Potentially Significant	Potentially Significant	Less Than Significant	No Impact
INF	TORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	Impact
9a	. Response: (Source: GP 2025 FPEIR Table 5.8-A – Benefi	cial Uses Rec	eiving Water)		
and fa waste that is Furth	roposed project involves minor exterior modifications to a açade improvements will not significantly change the exist discharge requirement. Further, given that the site is full is currently covered in hardscape, an impermeable surface er, given that the site is served by Riverside Public Utilitie d water. A less than significant impact is expected.	ing drainage y developed e, the project	nor will it vion and that the at the at the at the attention and the more alternary and the more alternary and the attention at the attention and the attention and the attention at the attention and the attention at the attention attention at the attention attention at the atte	olate any wat addition will r ground wa	er quality or occupy space ter recharge.
b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
9b	b. Response: (Source: General Plan 2025 Table PF-1 - R Table PF-2 - RPU Projected Water Demand, Table P Domestic Water Supply (AC-FT/YR), RPU Map of Water WMWD Urban Water Management Plan)	F-3 – Weste	ern Municipal	Water Distr	rict Projected
See re	sponse 9a above.				
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				
	sponse 9a above.				
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				
9d	l. Response: (Source: Preliminary grading plan)				
See re	sponse 9a above.				
e.	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?				
9e	Response: (Source: Preliminary Grading Plan)				
See re	sponse 9a above.				
f.	Otherwise substantially degrade water quality?				
9f	. Response:				

ISSU	JES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact	
INF	ORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	Impact	
See resj	ponse 9a above.					
g.	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?					
9g.	Response: (Source: General Plan 2025 Figure PS-4 – Flo Zone X, Panel 06065C0726G)	od Hazard Ar	eas, and FEM	IA Flood Haze	ard Maps	
	oject site is located within Zone X of the FEMA floodplain ood zones. As such, the project will have no impact.	maps. Zone	X is located o	outside of all 1	00- and 500-	
h.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?					
9h.	Response: (Source: General Plan 2025 Figure PS-4 – Flo Zone X, Panel 06065C0726G)	od Hazard Ar	eas, and FEM	IA Flood Haza	ard Maps	
	oject site is located within Zone X of the FEMA floodplain ood zones. As such, the project will have no impact.	maps. Zone	X is located o	outside of all 1	00- and 500-	
i.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?					
9i.	Response: (Source: General Plan 2025 Figure PS-4 – Flo Zone X, Panel 06065C0726G)	od Hazard Ar	reas, and FEM	IA Flood Haze	ard Maps	
	oject site is located within Zone X of the FEMA floodplain ood zones. Further, the site is not located within a Dam In					
j.	Inundation by seiche, tsunami, or mudflow?					
9j. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality) Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis will occur directly, indirectly or cumulatively.						
10. L A	AND USE AND PLANNING:					
Wo	uld the project:					
a. 10 a	Physically divide an established community? Response: (Source: General Plan 2025 Land Use and Urb Riverside GIS/CADME man layers)	an Design El	ement, Project	t site plan, Cit	y of	
Riverside GIS/CADME map layers) As noted above, the project site is fully developed. The proposed project includes a minor 546 square foot addition, façade upgrades and minor changes to the approved occupancy of the building. Given that the site is fully developed, including all on-site and off-site improvements, the project will have no impact on physically dividing an established community.						

ISSU	JES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact		
INF	ORMATION SOURCES):	Impact	Unless Mitigation	Impact	2		
			Incorporated				
b.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the						
	purpose of avoiding or mitigating an environmental effect?						
The pr	10b. Response: (Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Downtown Specific Plan, Title 19 – Zoning Code, Title 18 – Subdivision Code, Title 7 – Noise Code, Title 17 – Grading Code, Title 20 – Cultural Resources Code, Title 16 – Buildings and Construction and Citywide Design and Sign Guidelines) The proposed project is consistent with the General Plan and Specific Plan with jurisdiction over the project site. The originally project approval was in 1965 at which time, variances were granted to permit a reduction in parking						
impact	project site. Given the relatively minor changes to the project	oject site, tile	project win i	iave a less tila	ın sığımıcanı		
ппрась	•						
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?						
See Res	Sobrante Landfill Habitat Conservation Plan) sponse 4f above.						
	INERAL RESOURCES. build 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?						
11a	. Response: (Source: General Plan 2025 Figure – OS-1 – M	Aineral Resou	rces)				
The project site is built out. There are no known mineral resources within the project area. As such, no impact is expected.							
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?						
11b	o. Response: (Source: General Plan 2025 Figure – OS-1 – M	Aineral Resou	rces)				
	The project site is built out. There are no known mineral resources within the project area. As such, no impact is expected.						

ISSUES (AND SUPPORTING	Potentially	Potentially	Less Than	No		
INFORMATION SOURCES):	Significant Impact	Significant Unless Mitigation Incorporated	Significant Impact	Impact		
12. NOISE. Would the project result in:						
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?						
12a. Response: (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-1 – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code) The proposed project will result in minor temporary increases to ambient noise levels as a result of the façade improvements and addition. However, this increase is temporary in nature and will not result in a prolonged						
increase in noise levels. The project is required to comply with project will have a less than significant impact.	Title 7 of th	e Municipal (Code, Noise.	As such, the		
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?						
Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Road N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and ARB Noise Contours, FPEIR Table 5.11-G – Vibration So – Noise Existing Conditions Report) See Response 12a above.	Flabob Airpo	rt Noise Cont	ours, Figure	N-9 – <i>March</i>		
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?						
12c. Response: (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contours, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-1 – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code) See Response 12a above.						
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?						
12d. Response: (Source: FPEIR Table 5.11-J - Construction Equipment Noise Levels, Appendix G - Noise Existing Conditions Report) See Response 12a above.						
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						

ISSUES (AND SUPPORTING INFORMATION SOURCES):		Potentially Significant	Potentially Significant	Less Than Significant	No Impact
		Impact	Unless Mitigation Incorporated	Impact	Impact
	expose people residing or working in the project area to excessive noise levels?				
12e	e. Response: (Source: General Plan 2025 Figure N-8 – Rive – March ARB Noise Contour, Figure N-10 – Noise/Land Air Reserve Base/March inland Port Comprehensive Land Zone Study for March Air Reserve Base (August 2005))	Use Noise Co	ompatibility C	riteria, RCAL	UCP, March
See Re	sponse 12a above.				
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				
12f	Response: (Source: General Plan 2025 Figure PS-6 – Al March Air Reserve Base/March Inland Port Compreh Compatible Use Zone Study for March Air Reserve Base (A	ensive Land	Use Plan (.		
See Re	sponse 12a above.				
	OPULATION AND HOUSING. ould the project:				
a.	Induce substantial 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)?			\boxtimes	
13a	A. Response: (Source: General Plan 2025 Table LU-3 – La Population and Households Forecast, Table 5.12-B – Gen 2025, Table 5.12-C – 2025 General Plan and SCAG C Projections 2025, Capital Improvement Program and SCAG	neral Plan Po omparisons,	opulation and Table 5.12-D	Employment	Projections-
the lim	oject will result in a next change of 546 square feet of spacified scope, the project will not induce substantial populat gnificant impact is expected.				
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				
	o. Response: (Source: CADME Land Use 2003 Layer) oject does not involve the displacement or removal of any o	lwelling unit	s No impact	is evnected	
The pr	oject does not involve the displacement of Temovia of any C	iweimig ume	s. 140 impact	із сарссіси.	
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				
130	c. Response: (Source: CADME Land Use 2003 Layer)				
See res	ponse 13b above.				

ISSUES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact		
INFORMATION SOURCES):	Impact	Unless Mitigation	Impact	Impact		
		Incorporated				
14. PUBLIC SERVICES.		1				
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:	1 1 2 1					
a. Fire protection?				\square		
14a. Response: (Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1) The project site is fully developed. The proposed project, façade upgrade, 546 square foot addition, and minor changes to occupancy, will not alter the Fire Department or Police Department's ability to protect and serve the facility. Further, given that the site is age restricted, the site will have no impact on schools. Finally, given that the project will only increase the overall population of the building by 6 beds, there will be a less than significant impact on Parks and other public facility.						
b. Police protection?						
14b. Response: (Source: General Plan 2025 Figure PS-8 – No	zighborhood P	olicing Center	rs)			
See response 14a above. c. Schools?	Ιп					
14c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Boul Boundaries, Table 5.13-E – AUSD, Table 5.13-G – Stu Level, and Figure 5.13-4 – Other School District Boundar	dent Generati			13-3 – AUSD		
See response 14a above.						
d. Parks?			\boxtimes			
14d. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)						
See response 14a above.						
e. Other public facilities?						
14e. Response: (Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)						
See response 14a above.						

ISSUES (AND SUPPORTING Potentiall Significan		Potentially Significant	Less Than Significant	No Impact		
INFORMATION SOURCES):	Impact	Unless Mitigation Incorporated	Impact	Impact		
15. 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?						
15a. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007) See response 14a above.						
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?						
See response 14a above.						
16. TRANSPORTATION/TRAFFIC. Would the project:	_					
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?						
16a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP) As noted above, the project will result in an increase of 6 beds and 2 independent living units. The increase, compared to the approved 124 total units will have a less than significant increase on traffic.						
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?						
16b. Response: (Source: General Plan 2025 Figure CCM-4 - Volume to Capacity (V/C) Ratio and Level of Service Future Trip Generation Estimates, Table 5.15-H - Exist of Service, Table 5.15-I - Conceptual General Plan Inter - Current Status of Roadways Projected to Operate at L. Proposed General Plan Appendix H - Circulation F	(LOS) (Typic ting and Typic esection Impro OS E or F in	cal 2025), Tai cal Density So ovement Recor 2025, Table 5	ble 5.15-D – cenario Inters mmendations, 5.15K – Free	Existing and ection Levels Table 5.15-J wway Analysis		

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ISSUES (AND SUPPORTING	Potentially Significant	Potentially Significant	Significant Impact on	No Impact
INFORMATION SOURCES):	Impact	Unless Mitigation Incorporated		
SCAG's RTP)	l	-		
The project is consistent with the General Plan which is conprogram. As such, the project will have a less than significant im		the County	Congestion	Management
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				
16c. Response: (Source: General Plan 2025 Figure PS-6 – A March Air Reserve Base/March Inland Port Compreh Compatible Use Zone Study for March Air Reserve Base (A	ensive Land			
As noted above, the project will not alter any air traffic patterns.	No impact is	s expected.		
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
16d. Response: (Source: Project Site Plans)	I			
The project will not result in increased hazards due to a desig project will have only minor changes to the overall site design. N			rently develo	oped and the
e. Result in inadequate emergency access?			\boxtimes	
16e. Response: (Source: California Department of Transport Fire Code)	tation Highwo	ay Design Mai	nual, Municip	oal Code, and
The proposed project is fully developed in a fully developed ne streets, nor will it have any impact on emergency access. As emergency access at all times during construction. However, gi changes, the construction should not interfere with current emergency.	s conditioned ven the small	l, the site will size of the a	ll be require	d to provide
f. Conflict with adopted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				
16f. Response: (Source: FPEIR, General Plan 2025 Land Mobility and Education Elements, Bicycle Master Plan, Sc				
See response 16a-e above.	3 2	3	J	• /
17. UTILITIES AND SYSTEM SERVICES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				
17a. Response: (Source: General Plan 2025 Figure PF-2 – Service Areas, Table 5.16-K - Estimated Future Wastewater Area, Table 5.16-L - Estimated Future Wastewater Gen Figure 5.8-1 – Watersheds)	er Generation	for the City of	f Riverside's S	Sewer Service

ISSU	JES (AND SUPPORTING	Potentially Significant	Potentially Significant	Less Than Significant	No Impact	
INFORMATION SOURCES):		Impact	Unless Mitigation Incorporated	Impact	Impact	
	roject is consistent with the General Plan. As such, the ent with the permitted discharge evaluated in the General					
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?					
17b. Response: (Source: General Plan 2025 Table PF-1 – RPU PROJECTED DOMESTIC WATER Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, Table 5.16-I - Current and Projected Water Use WMWD, Table 5.16-J - General Plan Projected Water Demand for WMWD Including Water Reliability 2025, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area & Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD, Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure.)						
	oject will result in an increase of 6 skilled nursing beds a , no new treatment facilities will need to be constructed. A					
c.	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?					
	c. Response: (Source: FPEIR Figure 5.16-2 - Drainage Fac	ilities)				
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?					
17d. Response: (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025, Table 5.16-H – Current and Projected Domestic Water Supply (acre-ft/year) WMWD Table 5.16-I Current and Projected Water Use WMWD, Table 5.16-J – General Plan Projected Water Demand for WMWD Including Water Reliability 2025, RPU Master Plan, EMWD Master Plan, WMWD Master Plan, and Highgrove Water District Master Plan) See responses 17a-b above.						
e.	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?					
17e. Response: (Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 - Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD) See responses 17a-b above.						
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			\boxtimes		

ISSUES (AND SUPPORTING		Potentially Significant	Potentially Significant	Less Than Significant	No Impact
INFORMATION SOURCES):		Impact	Unless Mitigation	Impact	Impact
			Incorporated		
171	R. Response: (Source: FPEIR Table 5.16-A – Existing Land) Generation from the Planning Area)	fills and Tabl	e 5.16-M – Est	imated Futur	e Solid Waste
See res	sponse 17a-b above.				
g.	Comply with federal, state, and local statutes and regulations related to solid waste?				
178	g. Response: (Source: California Integrated Waste Manager	ment Board 2	002 Landfill F	Cacility Compl	iance Study)
	roject is currently served by Burrtec Waste Industries. with all applicable federal, state, and local statutes and re				required to
10 N/	AND A TODY EINDINGS OF SIGNIFICANCE				
	ANDATORY FINDINGS OF SIGNIFICANCE.				
a.	Does the project have the potential to 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, 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?				
18a. Response: (Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, and FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code)					
	sponses in Sections 4 (Biological Resources) and 5 (Cultur supports the conclusion that the proposed project will not a				
	ore, no impacts will result from this project.		- vg -wa-wa-o o-		
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)?				
181	b. Response: (Source: FPEIR Section 6 - Long-Term Eff	fects/ Cumula	tive Impacts	for the Gener	al Plan 2025
	Program)		- "		
No adv	verse cumulative impacts were identified in the Initial Stud	y analysis.			
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				
180	c. Response: (Source: FPEIR Section 5 – Environmental Im	pact Analysis	s for the Gener	ral Plan 2025	Program)

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

Effects on human beings were evaluated as part of the aesthetics, air quality, hydrology & water quality, noise, population and housing, hazards and hazardous materials, and traffic sections of this initial study and found to be less than significant for each of the above sections. Based on the analysis and conclusions in this initial study, the project will not cause substantial adverse effects, directly or indirectly to human beings. Therefore, the proposal will have no potential impacts on human beings, either directly or indirectly.

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 ¹	Monitoring/Reporting Method
CULTURAL	MM CULTURAL 1: In keeping with the architectural styling of the building, the addition shall utilize vertical elements that line up with the existing vertical piers.	PRIOR TO PERMIT ISSUANCE	PLANNING DIVISION	PLAN CHECK FILES
CULTURAL	MM CULTURAL 2: The glazing of the new addition shall significantly resemble the existing glazing with aluminum, or other metallic, surrounds, mullions, and muntins, as appropriate to Cultural Heritage Board Staff.	PRIOR TO PERMIT ISSUANCE	PLANNING DIVISION	PLAN CHECK FILES
CULTURAL	MM CULTURAL 3: Should the existing brick prove insufficient for adaptive reuse, the applicant shall provide material samples (including original and proposed) of any new brick for Cultural Heritage Staff for review and approval prior to installing the new brick.	PRIOR TO PERMIT ISSUANCE	PLANNING DIVISION	PLAN CHECK FILES
CULTURAL	MM CULTURAL 4: The façade improvements shall utilize railing similar in style, material, finish and detail to the existing railings. The railings shall be metal with an aluminum style finish that are vertical in design.	PRIOR TO PERMIT ISSUANCE	PLANNING DIVISION	PLAN CHECK FILES

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¹ All agencies are City of Riverside Departments/Divisions unless otherwise noted.