

Exhibit 7 - ABC Alcohol License Census Tract Concentration Map

0 750 1,500 Feet

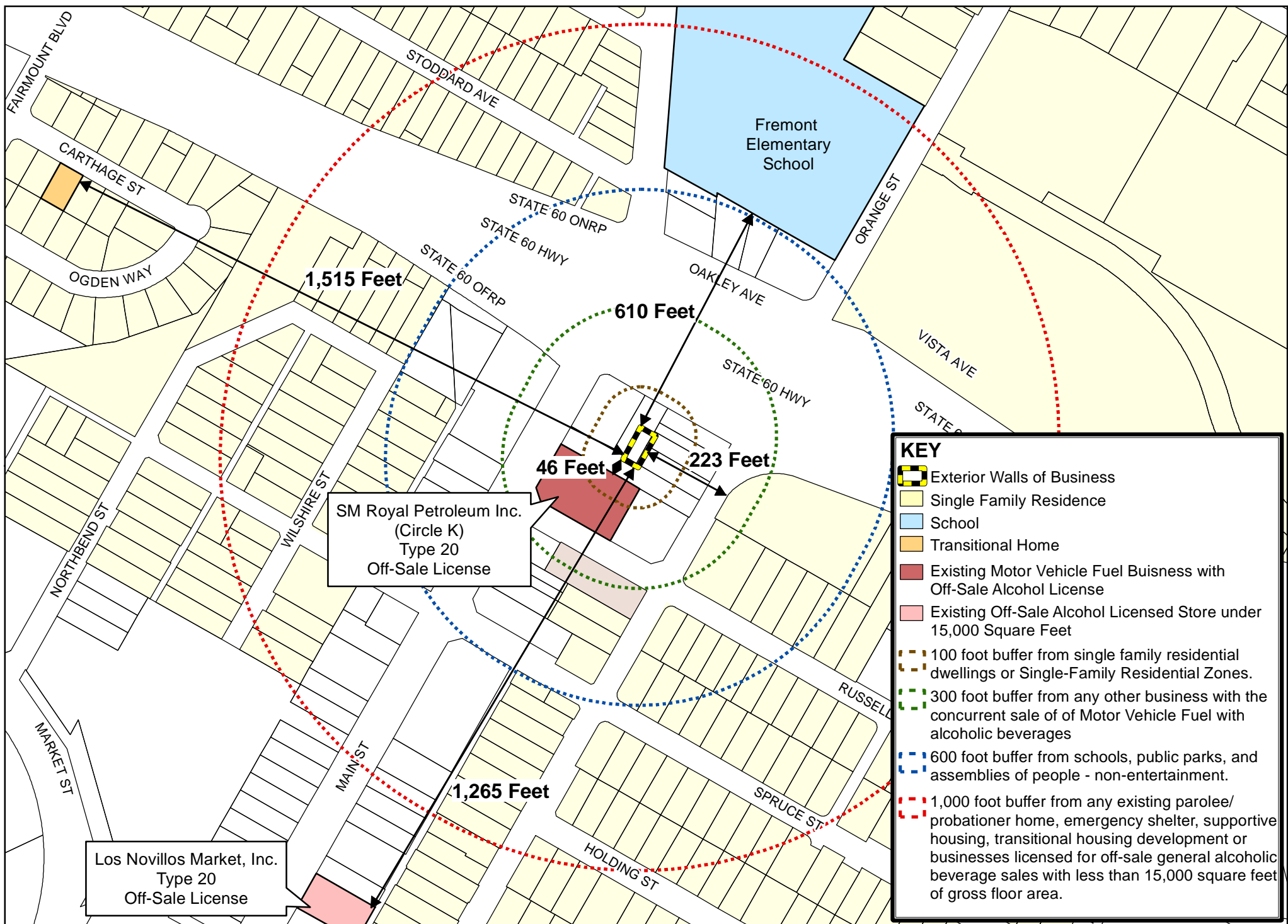


Exhibit 8 - Alcohol License Distance Requirements Map



City of Arts & Innovation

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

Draft Mitigated Negative Declaration

WARD: 1

1. **Case Number:** P15-0907 (Conditional Use Permit), P15-0908 (Conditional Use Permit), P15-0909 (Design Review), P16-0285 (Variance), P16-0651 (Variance), P17-0544 (Public Convenience or Necessity), and P17-0646 (Grading Exception)
2. **Project Title:** Main Street Plaza Project
3. **Hearing Date:** October 19, 2017
4. **Lead Agency:** City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
5. **Contact Person:** Candice Assadzadeh, Associate Planner
Phone Number: (951) 826-5667
6. **Project Location:** 2234 N. Main Street, 2225 Orange Street, and 2243 Orange Street, situated south of State Route 60 (SR 60), between Main Street and Orange Street
7. **Project Applicant/Project Sponsor's Name and Address:** Ed Haddad (AHD Limited Partnership)
422 Wier Road
San Bernardino, CA 92408
8. **General Plan Designation:** DSP – Downtown Specific Plan
9. **Zoning:** DSP-NMS (Downtown Specific Plan – North Main Street District)
10. **Description of Project:**

Proposal by Alex Mucino of AHD, LP to consider the following entitlements for the development of 1.99 vacant acres with a vehicle service station and fast food drive thru restaurant: 1) a Conditional Use Permit to permit the construction of a vehicle service station consisting of a 4,855 square foot canopy, a 968 square foot automated car wash, and a 3,645 square foot convenience store in conjunction with the off sale of beer and wine; 2) a Conditional Use Permit to permit the construction of a 2,546 square foot fast food drive-thru restaurant; 3) Design Review of project plans; 4) Variances to allow a reduced landscape setback along Orange Street, and a reduced separation requirement from a business with the concurrent sale of motor vehicle fuel with alcoholic beverages; 5) a Public Convenience or Necessity determination to allow the off-

sale of beer and wine; and 6) a Grading Exception to allow retaining walls higher than required by Code. The project site is located at 2234 N. Main Street, 2225 Orange Street, and 2243 Orange Street, situated south of State Route 60, between Main and Orange Streets, in the DSP-NMS – Downtown Specific Plan – North Main Street District, in Ward 1

There is an existing Caltrans easement on the site for the purpose of soil nails due to the site's proximity to a retaining wall within the adjacent SR 60. The applicant will therefore require an encroachment permit for the proposed landscaping and drive aisle within the easement area.

Construction Timeline

Construction of the proposed Main Street Plaza is anticipated to begin in March of 2018 with an expected completion date of September 2018.

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

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant	DSP – Downtown Specific Plan	DSP-NMS (Downtown Specific Plan – North Main Street District)
North	State Route 60 Freeway	N/A	N/A
South	Gas Station and Convenience Store (76 Station) and Vacant Property	DSP – Downtown Specific Plan	DSP-NMS (Downtown Specific Plan – North Main Street District)
East	Caltrans Park and Ride Parking Lot and Single Family Residence	C – Commercial	R-1-7000 (Single Family Residential)
West	Drive-Thru Restaurant (Baker's)	DSP – Downtown Specific Plan	DSP-NMS (Downtown Specific Plan – North Main Street District)

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

- Santa Ana Regional Water Quality Control Board (Storm Water Pollution Prevention Plan/Water Quality Management Plan);
- South Coast Air Quality Management District;
- Caltrans; and
- Any other responsible agency that may have discretionary authority over all or a portion of the Project

13. Other Environmental Reviews Incorporated by Reference in this Review:

- Riverside General Plan 2025

- b. City of Riverside General Plan 2025 Final Program EIR (FPEIR)
- c. Downtown Specific Plan
- d. Air Quality and GHG Impact Analyses, Main Street Plaza, City of Riverside, California, prepared by Giroux & Associates, February 22, 2017, provided as Appendix 1
- e. MSHCP Burrowing Owl Survey Area, and Biological Resources Assessment, Main Street Plaza Project, March 1, 2017, provided as Appendix 2a, March 1, 2017
- f. MSHCP Consistency Analysis, Main Street Plaza Project, March 1, 2017, provided as Appendix 2b
- g. Phase I Historical/Archaeological Resources Survey: Main Plaza-Riverside Project, 2234 Main Street and 2225-2243 Orange Street, City of Riverside, Riverside County, California, CRM TECH, February 24, 2017, provided as Appendix 3
- h. Traffic Impact Analysis, Main Street Plaza, Prepared by LSA Associates, Inc., September 27, 2016, Provided as Appendix 4

Appendices are available at City of Riverside, City Hall, Planning Division, 3900 Main Street, 3rd Floor, Riverside, CA 92522.

14. Acronyms

AICUZ -	Air Installation Compatible Use Zone Study
AFY -	Acre Feet per Year
APE-	Area of Potential Effect
AQMP -	Air Quality Management Plan
AUSD -	Alvord Unified School District
BMP -	Best Management Practices
BUOW -	Burrowing Owl
CBC -	California Building Code
CEQA -	California Environmental Quality Act
CMP -	Congestion Management Plan
EIR -	Environmental Impact Report
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
GHG -	Greenhouse Gas
GP 2025 -	General Plan 2025
IS -	Initial Study
LHMP -	Local Hazard Mitigation Plan
LST -	Localized Significance Thresholds
MARB/MIP -	March Air Reserve Base/March Inland Port
MGD -	Million Gallons per Day
MJPA-JLUS -	March Joint Powers Authority - Joint Land Use Study
MLD -	Most Likely Descendent
MSHCP -	Multiple-Species Habitat Conservation Plan
MVUSD -	Moreno Valley Unified School District
NCCP -	Natural Communities Conservation Plan
NPDES -	National Pollutant Discharge Elimination System
OEM -	Office of Emergency Services
OPR -	Office of Planning & Research, State
PEIR -	Program Environmental Impact Report

PW -	Public Works, Riverside
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
RRWQTP -	Riverside Regional Water Quality Treatment Plant
RTIP -	Regional Transportation Improvement Plan
RTP -	Regional Transportation Plan
RUSD -	Riverside Unified School District
RWQCB -	Santa Ana Regional Water Quality Board
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SCH -	State Clearinghouse
SKR-HCP -	Stephens' Kangaroo Rat - Habitat Conservation Plan
SOI-	Secretary of Interior
SOIS-	Secretary of Interior Standards
SR-	State Route
SWPPP -	Storm Water Pollution Prevention Plan
UWMP -	Urban Water Management Plan
USGS -	United States Geologic Survey
WMWD -	Western Municipal Water District
WQMP -	Water Quality Management Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forest Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Service | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Tribal Resources | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance | | |

DETERMINATION: (To be completed by the Lead Agency)

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

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

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

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

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

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

Signature _____

Date _____

Printed Name & Title _____

For City of Riverside



City of Arts & Innovation

COMMUNITY & ECONOMIC DEVELOPMENT

DEPARTMENT

Planning Division

Environmental Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. **Earlier Analysis Used.** Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside

document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

1a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways)

Less Than Significant Impact – Adverse impacts to scenic vistas can occur in one of two ways. A review of the project area determined that there are no scenic vistas located internally within the area proposed for the development of the Main Street Plaza Project. Therefore, the development of Main Street Plaza is not expected to impact any important scenic vistas within the project area. Main Street is classified as a 100-foot arterial and not designated as a Scenic or Special Boulevard or Parkway (General Plan 2025, Figure CCM-4). The construction of the Main Street Plaza will not obstruct any important vistas in the area and is consistent with the applicable zone designations within the proposed project site. Given that no identified scenic vistas are within the vicinity of the Project, implementation of the proposed development is not forecast to cause any substantial effects on any important scenic vistas. This potential impact is considered a less than significant adverse aesthetic impact. No mitigation is required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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1b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City's Urban Forest Tree Policy Manual, Title 20 – Cultural Resources and, Title 19 – Article V – Chapter 19.100 – Residential Zones - RC Zone)

No Impact – The project site does not contain any scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway. The project site is currently vacant and consists mostly of exposed dirt because the site has not been graded since the previous structures were removed. There are dead weeds and trees located on the site that are not considered of value as visual resources. Thus, as no visual resources exist on site, and the site is not within a state scenic highway, no damage to a scenic resource will occur as a result of Project implementation. No mitigation is required.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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1c. Response: (Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)

Less Than Significant Impact – The proposed project will change the visual setting by replacing the existing highly disturbed vacant site with new structures. However, the project will be consistent with the current zoning classification and general plan land use designation. The surrounding uses include a gas station, a drive-thru restaurant, a parking lot, and the SR 60 highway. The Main Street Plaza will also develop a gas station and a drive thru restaurant, which are of the same type of uses that surround the site; thus the Project will be visually consistent with the surrounding uses. By developing the vacant site the visual character of this site and its surroundings will be enhanced. Thus, the Project would not substantially degrade the visual character or quality of the surrounding properties. No potential adverse visual impacts would occur as a result of project implementation. No mitigation is required.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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1d. Response: *(Source: General Plan 2025, General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines)*

Less Than Significant Impact– Existing sources of light in the Project area include streetlights, headlights and lighting from the adjacent freeway, lighting from the adjacent parking lot, and lighting from adjacent commercial and residential uses. The new gas station, car wash, convenience store, and drive thru restaurant will require lighting, both exterior and interior that will be present 24 hours a day, 7 days a week once the project is in operation. This will introduce a new source of light and glare into the project area, though this lighting would be comparable to and consistent with lighting from surrounding uses; particularly because the nearest residential uses are located approximately 100 feet from the southern border of the site. The project will be conditioned to submit a photometric plan for review/approval, prior to building permit issuance. Additionally, the Project will comply with all City Lighting Standards as outlined in the Municipal Code, Chapter 19.556. Therefore, through the compliance of applicable lighting standards potential light and glare impacts associated with the proposed Project will be less than a significant impact. No mitigation is required.

2. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2a. Response: *(Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability & General Plan 2025 FPEIR – Appendix I – Designated Farmland Table)*

No Impact – The Main Street Plaza is in an area that is urbanized. Neither the project site, not the adjacent and surrounding properties are designated for agricultural use; no agricultural activities exist in the project area; and there is no potential for impact to any agricultural uses or values as a result of project implementation. According to the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, no prime farmland, unique farmland, or farmland of statewide importance exists within the vicinity of the proposed project (Figure 2-1). Additionally, according to the Riverside General Plan 2025 Agricultural Suitability Map, the surrounding area is entirely urbanized and built-up land (Figure 2-2). Therefore, no adverse impact to any agricultural resources would occur from implementing the proposed project. No mitigation is required.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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2b. Response: *(Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)*

No Impact – There are no agricultural uses currently on the Project site or on adjacent properties. The project site is zoned for DSP-NMS and the General Plan land use designation is Downtown Specific Plan. Therefore, No potential exists for a conflict between the proposed project and agricultural zoning or Williamson Act contracts within the project area. No mitigation is required.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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2c. Response: *(Source: GIS Map – Forest Data)*

No Impact – Please refer to sections a) and b) above. The project site is in an urbanized area and neither the land use designation (DSP-NMS) nor zoning classification (Downtown Specific Plan) supports forest land or timberland uses or designations. No potential exists for a conflict between the proposed project and forest/timberland zoning. No mitigation is required.

d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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2d. Response: *(Source: GIS Map – Forest Data)*

No Impact – There are no forest lands within the project area because the project area is urbanized. No potential for loss of forest land would occur if the project is implemented. No mitigation is required.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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2e. Response: *(Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, General Plan 2025, Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone and GIS Map – Forest Data)*

No Impact – Because the project site and surrounding area do not support either agricultural or forestry uses and, furthermore, because the project site and environs are not designated for such uses, implementation of the proposed project would not cause or result in the conversion of Farmland or forest land to alternative use. No adverse impact would occur. No mitigation is required.

3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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3a. Response: *(Source: South Coast Air Quality Management District's 2007 Air Quality Management Plan (AQMP), Air Quality and GHG Impact Analyses, Main Street Plaza, City of Riverside, California, prepared by Giroux & Associates, February 22, 2017, provided as Appendix 1)*

Less Than Significant With Mitigation Incorporated – Please refer to discussion below.

Air Quality Planning

The following discussion outlines the History of Air Quality Regulations and Planning as adopted at both Federal and State levels:

The Federal Clean Air Act (1977 Amendments) required that designated agencies in any area of the nation not meeting national clean air standards must prepare a plan demonstrating the steps that would bring the area into compliance with all national standards. The South Coast Air Basin (SCAB) could not meet the deadlines for ozone, nitrogen dioxide, carbon monoxide, or PM-10. In the SCAB, the agencies designated by the governor to develop regional air quality plans are the SCAQMD and the Southern California Association of Governments (SCAG). The two agencies first adopted an Air Quality Management Plan (AQMP) in 1979 and revised it several times as earlier attainment forecasts were shown to be overly optimistic.

The 1990 Federal Clean Air Act Amendment (CAAA) required that all states with air-sheds with “serious” or worse ozone problems submit a revision to the State Implementation Plan (SIP). Amendments to the SIP have been proposed, revised and approved over the past decade. The most current regional attainment emissions forecast for ozone precursors (ROG and NOx) and for carbon monoxide (CO) and for particulate matter are shown in Table 3-1. Substantial reductions in emissions of ROG, NOx and CO are forecast to continue throughout the next several decades. Unless new particulate control programs are implemented, PM-10 and PM-2.5 are forecast to slightly increase.

The Air Quality Management District (AQMD) adopted an updated clean air “blueprint” in August 2003. The 2003 Air Quality Management Plan (AQMP) was approved by the EPA in 2004. The AQMP outlined the air pollution measures needed to meet federal health-based standards for ozone by 2010 and for particulates (PM-10) by 2006. The 2003 AQMP was based upon the federal one-hour ozone standard which was revoked late in 2005 and replaced by an 8-hour federal standard. Because of the revocation of the hourly standard, a new air quality planning cycle was initiated.

With re-designation of the air basin as non-attainment for the 8-hour ozone standard, a new attainment plan was developed. This plan shifted most of the one-hour ozone standard attainment strategies to the 8-hour standard. As previously noted, the attainment date was to “slip” from 2010 to 2021. The updated attainment plan also includes strategies for ultimately meeting the federal PM-2.5 standard.

Because projected attainment by 2021 requires control technologies that do not exist yet, the SCAQMD requested a voluntary “bump-up” from a “severe non-attainment” area to an “extreme non-attainment” designation for ozone. The extreme designation will allow a longer time period for these technologies to develop and be implemented. If attainment cannot be demonstrated within the specified deadline without relying on “black-box” measures, EPA would have been required to impose sanctions on the region had the bump-up request has not been approved. In April 2010, the EPA approved the change in the non-attainment designation from “severe-17” to “extreme.” This reclassification sets a later attainment deadline (2024), but also requires the air basin to adopt even more stringent emissions controls. Table 3-1 outlines the SCAB emissions forecasts for the entire Basin for NOx, VOC, PM₁₀, and PM_{2.5}; these forecasts are used for planning purposes to compare project level emissions to overall emissions forecast within the SCAB.

**Table 3-1
SOUTH COAST AIR BASIN EMISSIONS FORECASTS (Emissions in tons/day)**

Pollutant	2012^a	2015^b	2020^b	2025^b	2030
NOx	512	451	357	289	266

ISSUES (AND SUPPORTING INFORMATION SOURCES):		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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VOC	466	429	400	393	393
PM-10	154	155	161	165	170
PM-2.5	68	67	67	68	170

^a 2012 Base Year (Year from which Actual Emissions were measured, from which the Emissions Forecasts were then based upon).

^b With current emissions reduction programs and adopted growth forecasts.

Source: California Air Resources Board, 2013 Almanac of CEPAM

In other air quality attainment plan reviews the EPA has disapproved part of the SCAB PM-2.5 attainment plan included in the AQMP. EPA has stated that the current attainment plan relies on PM-2.5 control regulations that have not yet been approved or implemented. It is expected that a number of rules that are pending approval will remove the identified deficiencies. If these issues are not resolved within the next several years, federal funding sanctions for transportation projects could result. The 2012 AQMP included in the ARB submittal to the EPA as part of the California State Implementation Plan (SIP) is expected to remedy identified PM-2.5 planning deficiencies.

The federal Clean Air Act requires that non-attainment air basins have the EPA approved attainment plans in place. This requirement includes the federal one-hour ozone standard even though that standard was revoked almost ten years ago. There was no approved attainment plan for the one-hour federal standard at the time of revocation. Through a legal quirk, the SCAQMD is now required to develop an AQMP for the long since revoked one-hour federal ozone standard. Because the 2012 AQMP contains a number of control measures for the 8-hour ozone standard that are equally effective for one-hour levels, the 2012 AQMP is believed to satisfy hourly attainment planning requirements.

AQMPs are required to be updated every three years. The 2012 AQMP was adopted in early 2013. An updated AQMP was required for completion in 2016. The 2016 AQMP was adopted by the SCAQMD Board in March, 2017, and has been submitted the California Air Resources Board for forwarding to the EPA. The 2016 AQMP acknowledges that motor vehicle emissions have been effectively controlled and that reductions in NOx, the continuing ozone problem pollutant, may need to come from major stationary sources (power plants, refineries, landfill flares, etc.). The current attainment deadlines for all federal non-attainment pollutants are now as follows:

8-hour ozone (70 ppb)	2032
Annual PM-2.5 (12 µg/m ³)	2025
8-hour ozone (75 ppb)	2024 (old standard)
1-hour ozone (120 ppb)	2023 (rescinded standard)
24-hour PM-2.5 (35 µg/m ³)	2019

The key challenge is that NOx emission levels, as a critical ozone precursor pollutant, are forecast to continue to exceed the levels that would allow the above deadlines to be met. Unless additional NOx control measures are adopted and implemented, attainment goals may not be met.

The proposed project does not directly relate to the AQMP in that there are no specific air quality programs or regulations governing commercial development projects. Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use is the primary yardstick by which impact significance of planned growth is determined. The SCAQMD, however, while acknowledging that the AQMP is a growth-accommodating document, does not favor designating regional impacts as less-than-significant just because the proposed development is consistent with regional growth projections. Air quality impact significance for the proposed project has therefore been analyzed on a project-specific basis. For further analysis on a project-specific basis, please refer to the discussion under 3b below.

There are a few identified criteria for determining consistency with the AQMP (defined in Chapter 12, Section 12.2 and 12.3 of SCQAMD's CEQA Air Quality Handbook. Consistency Criterion No. 1 indicates: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. For the Main Street Plaza Project, both construction and operation emissions are well below the standards outlined in the AQMP (outlined in the discussion under 3b below). Consistency Criterion No. 2 indicates: The project will not exceed the assumptions in the AQMP based on the years of Project build-out phase. The Main Street Plaza Project is considered a development consistent with the growth projections in the City of Riverside General Plan, and is therefore consistent with the AQMP. The Main Street Plaza would employ between 20 and 30 people. This nominal change in the work force within the City is well within the SCAG Population and Households Forecast of 339,000 in 2020, which includes 198,300 jobs, which is 70,801 more than there were in 2013 according to the SCAG profile of the City. Additionally, the Project is considered consistent with the existing land use designations. Thus, the Project is consistent with Consistency Criterion No. 2. Thus, given the Project's consistency with the AQMP, impacts under this issue are considered less than significant with mitigation identified below.

MM 3-1 Fugitive Dust Control

- Apply soil stabilizers or moisten inactive areas.
- Address previously disturbed areas if subsequent construction is delayed.
- Water exposed surfaces as needed to avoid visible dust leaving the construction site (typically 2-3 times/day).
- Cover all stock piles with tarps at the end of each day or as needed.
- Provide water spray during loading and unloading of earthen materials.
- Minimize in-out traffic from construction zone.
- Cover all trucks hauling dirt, sand, or loose material and require all trucks to maintain at least two feet of freeboard.
- Sweep streets daily if visible soil material is carried out from the construction site.

MM 3-2 Exhaust Emissions Control

- Utilize well-tuned off-road construction equipment.
- Establish a preference for contractors using Tier 3 or better heavy equipment.
- Require the dozer be equipped with a dpf filter for the estimated 8 days of grading.
- Enforce 5-minute idling limits for both on-road trucks and off-road equipment.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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3b. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 AQMP, URBEMIS 2007 Model or CalEEMod, EMFAC 2007 Model and Air Quality and GHG Impact Analyses, Main Street Plaza, City of Riverside, California, prepared by Giroux & Associates, February 22, 2017, provided as Appendix 1)

Less Than Significant With Mitigation Incorporated – Refer to the data compiled in Appendix 1 for a detailed analysis of Air Quality impacts.

Construction Impacts

Estimated construction emissions were modeled using CalEEMod2016.3.1 to identify maximum daily emissions for each pollutant during project construction.

The proposed project entails construction of a gas station with 16 fuel pumps and convenience store as well as a 2,500 SF fast food restaurant with drive-through. There will also be 54,100 SF of paved surfaces. Construction was modeled in CalEEMod2016.3.1 using default construction equipment and schedule for a project of this size as shown in Table 3-3.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**TABLE3-3
CONSTRUCTION ACTIVITY EQUIPMENT FLEET**

Phase Name and Duration	Equipment
Grading (4 days)	1 Grader
	1 Dozer
	1 Loader/Backhoe
Construction (200 days)	1 Crane
	1 Loader/Backhoe
	1 Generator Set
	3 Welders
	1 Forklift
Paving (10 days)	1 Paver
	1 Loader/Backhoe
	1 Paving Equipment
	1 Mixer
	1 Roller

Utilizing this indicated equipment fleet and durations shown in Table 6 the following worst case daily construction emissions are calculated by CalEEMod and are listed in Table 3-4.

**Table 3-4
CONSTRUCTION ACTIVITY EMISSIONS
MAXIMUM DAILY EMISSIONS (pounds/day)**

Maximal Construction Emissions	ROG	NOx	CO	SO₂	PM-10	PM-2.5
2017						
Unmitigated	6.3	20.6	16.0	0.0	5.9	3.4
Mitigated	6.3	20.6	16.0	0.0	3.2	2.0
2018						
Unmitigated	6.2	2.0	2.1	0.0	0.2	0.2
Mitigated	6.2	2.0	2.1	0.0	0.2	0.2
SCAQMD Thresholds	75	100	550	150	150	55

Peak daily construction activity emissions are estimated to be well below SCAQMD CEQA thresholds even without the application of any mitigation measures. However, emissions minimization through enhanced dust control measures is recommended for use because of the PM non-attainment status of the air basin and proximity to residential uses; therefore, the MM 3-1, outlined under issue 3a above, shall be implemented.

Construction equipment exhaust contains carcinogenic compounds within the diesel exhaust particulates. The toxicity of diesel exhaust is evaluated relative to a 24-hour per day, 365 days per year, 70-year lifetime exposure. The SCAQMD does not generally require the analysis of construction-related diesel emissions relative to health risk due to the short period for which the majority of diesel exhaust would occur. Health risk analyses are typically assessed over a 9-, 30-, or 70-year timeframe and not over a relatively brief construction period due to the lack of health risk associated with such a brief exposure. Ozone precursor emissions (ROG and NOx) are calculated to be below SCAQMD CEQA thresholds. However, because of the regional non-attainment for photochemical smog, the use of reasonably available control measures for diesel exhaust is recommended, and therefore MM 3-1, outlined under issue 3a above, shall be implemented.

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

The SCAQMD has developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs were developed in response to Governing Board's Environmental Justice Enhancement Initiative 1-4 and the LST methodology was provisionally adopted in October 2003 and formally approved by SCAQMD's Mobile Source Committee in February 2005.

Use of an LST analysis for a project is optional. For the proposed project, the primary source of possible LST impact would be during construction. LSTs are applicable for a sensitive receptor where it is possible that an individual could remain for 24 hours, such as a residence, hospital or convalescent facility.

LSTs are only applicable to the following criteria pollutants: oxides of nitrogen (NO_x), carbon monoxide (CO), and particulate matter (PM-10 and PM-2.5). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs are only applicable to on-site emissions.

LST screening tables are available for 25, 50, 100, 200 and 500-meter source-receptor distances. For this project the 50 meter distance was used to reflect nearby residences to the east.

The SCAQMD has issued guidance on applying CalEEMod to LSTs. LST pollutant screening level concentration data is currently published for 1, 2 and 5 acre sites for varying distances. For this site the most stringent thresholds for a 1 acre site were used.

The following thresholds and emissions in Table 3-5 are therefore determined (pounds per day):

Table 3-5
LST AND PROJECT EMISSIONS (pounds/day)

LST 1 acre/50 meters Metropolitan Riverside County	CO	NO_x	PM-10	PM-2.5
LST Thresholds	148	887	12	4
Max On-Site Emissions Unmitigated	16	21	6	3
Max On-Site Emissions Mitigated	16	21	3	2

CalEEMod Output

LSTs were compared to the maximum daily construction activities. As seen above, emissions will meet the LST for construction. LST impacts are less than significant even without the application of the mitigation measure; however, as previously stated, due to the non-attainment status of the air basin and proximity to residential uses, mitigation measure 3-1 shall be implemented.

Operational Impacts

Operational emissions were calculated using CalEEMod2016.3.1 for an assumed project build-out year of 2018 as a target for full occupancy. The project would generate 3,314 daily trips using trip generation numbers provided by the project traffic consultant. In addition to mobile sources from vehicles, general development causes smaller amounts of "area source" air pollution to be generated from on-site energy consumption (primarily landscaping) and from off-site electrical generation (lighting). These sources represent a minimal percentage of the total project NO_x and CO burdens, and a few percent other pollutants. The inclusion of such emissions adds negligibly to the total significant project-related emissions burden as shown in Table 3-5.

Table 3-6
DAILY OPERATIONAL IMPACTS

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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	Operational Emissions (lbs/day)					
Source	ROG	NOx	CO	SO₂	PM-10	PM-2.5
Area	0.1	0.0	0.0	0.0	0.0	0.0
Energy	0.0	0.2	0.2	0.0	0.0	0.0
Mobile	5.8	34.1	33.2	01	5.4	1.5
Total	5.9	34.3	33.4	0.1	5.4	1.5
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod2016.3.1 Output in Appendix

As seen in Table 3-6, the project would not cause any operational emissions to exceed their respective SCAQMD CEQA significance thresholds.

Gas Station Emissions

The gas station will employ state-of-the-art VOC emissions control technology. The gas station will utilize all required SCAQMD emission control measures. The SCAQMD will inspect the control systems and fueling equipment on a routine basis (at least annually, usually much more often) for proper operations. Each storage tank will have its own AQMD authority to construct and permit to operate. The use of best available control technology (BACT) for VOC control is mandatory before the AQMD can issue such permits.

Queuing Emissions

Vehicles waiting for gas pump access are a source of air pollution from idling vehicles queuing in line and inching forward to the pump. Similarly vehicles waiting in the drive thru window would generate idling emissions. With improved emissions technology, however, it requires thousands of idling cars to generate enough emissions that would be a threat to exceeding clean air standards.

The EMFAC2014 California emissions model shows that an idling passenger car in Southern California generates 7.6 grams of CO per hour at idle. The NOx emission rate is 0.64 grams per hour. The traffic report assumes a maximum of 116 vehicles at the gas dispensers and drive through per hour for peak hour¹. This would assume that all restaurant trips use the drive through. If one assumes a worst-case 10 minute of idling minutes during queuing per vehicle (assumes vehicles are shut off when pumping gas) there would be 37 hours of vehicle idling per peak hour (116 vehicles x 10 minutes idle/vehicle = 19 hours). The idling exhaust emissions would be 149 grams of CO and 12 grams of NOx per peak hour.

The Bay Area AQMD, which is used because SCQAMD does not provide any guidance for conservative worst-case, screening of air pollution exposure, in "Recommended Methods for Screening and Modeling Local Risks and Hazards" (May, 2011) suggests use of a cavity equation for conservative worst-case screening of air pollution exposure. The one-hour concentration [(Conc.(1-hour))] at the property line of a facility is expressed by:

$$\text{Conc.}(1\text{-hour}) = Q / (1.5 \times A \times U)$$

Where: Q is the emission rate in grams/second

A is the building cross-section (use 92.7 m² per BAAQMD guidance)

U is the wind speed (use 2 m/sec)

The worst-case fence-line concentration from idling emissions is calculated as follows:

Table 3-7
WORST-CASE FENCE-LINE EMISSIONS CONCENTRATION FROM IDLING

	Conc. (µg/m³)	Ambient Std. (µg/m³)	% of Standard
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¹ Total for all 16 gas pumps and entire restaurant vehicles

ISSUES (AND SUPPORTING INFORMATION SOURCES):		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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CO	149	23,000	0.6%
NOx	12	339	3.5%

Based on the table above, the fence line emissions concentrations from idling would be well below the Standard for idling exhaust emissions at 0.6% for CO and 3.5% for NOx. Therefore, idling exhaust emissions will be at less than significant levels relative to any air quality impacts to adjacent land uses.

Conclusion

Based on the analysis provided in this document, and in Appendix 1, the proposed project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation with the implementation of mitigation measure MM 3-1 and MM 3-2 above.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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3c. Response: *(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 Air Quality Management Plan, URBEMIS 2007 Model or CalEEMod 2007 Model, Air Quality and GHG Impact Analyses, Main Street Plaza, City of Riverside, California, prepared by Giroux & Associates, February 22, 2017, provided as Appendix 1)*

Less Than Significant With Mitigation Incorporated – Please refer to both the Air Quality Analysis provided in Appendix 1, and the discussion under 3b above. As shown in Tables 3-4 through 3-6 above, during all phases of the Project, the emissions for any criteria pollutant fall below emissions thresholds. Therefore, with implementation of mitigation measures MM 3-1 and MM 3-2, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Any impacts are considered less than significant with mitigation incorporation.

d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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3d. Response: *(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 Air Quality Management Plan, URBEMIS 2007 or CalEEMod, EMFAC 2007 Model and Air Quality and GHG Impact Analyses, Main Street Plaza, City of Riverside, California, prepared by Giroux & Associates, February 22, 2017, provided as Appendix 1)*

Less Than Significant With Mitigation Incorporated – Please refer to both the Air Quality Analysis provided in Appendix 1, and the discussion under 3b above. As noted in the preceding sections under this issue, the concentrations of pollutants as a result of implementation of the Project will not be significant. Refer specifically to the LST discussion in 3b above. Additionally, the SCAQMD does not generally require the analysis of construction-related diesel emissions relative to health risk due to the short period for which the majority of diesel exhaust would occur. Health risk analyses are typically assessed over a 9-, 30-, or 70-year timeframe and not over a relatively brief construction period due to the lack of health risk associated with such a brief exposure. Therefore, due to the short-term nature of construction-related diesel emissions, the potential to expose sensitive receptors to substantial pollutant concentrations is considered less than significant with implementation of mitigation measures MM 3-1 and MM 3-2.

e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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3e. Response: *(Source: Air Quality and GHG Impact Analyses, Main Street Plaza, City of Riverside, California, prepared by Giroux & Associates, February 22, 2017, provided as Appendix 1)*

Less Than Significant Impact – Odors can cause a variety of responses. The impact of an odor results from interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception. Odor-related symptoms reported in a number of studies include nervousness, headache, sleeplessness, fatigue, dizziness, nausea, loss of appetite, stomach ache, sinus congestion, eye irritation, nose irritation, runny nose, sore throat, cough, and asthma exacerbation (FCS 2013). The SCAQMD’s role is to protect the public’s health from air pollution by overseeing and enforcing regulations (FCS 2013). The SCAQMD’s resolution activity for odor compliance is mandated under California Health & Safety Code Section 41700, and falls under SCAQMD Rule 402.

This rule on Public Nuisance Regulation states: “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.”

Diesel exhaust and VOC would be emitted during construction of the project, which are objectionable to some persons; however, these emissions are considered short-term, and would only last as long as construction equipment operated; odors would disperse rapidly from the project site, and therefore would not be at a level to induce a negative odor response. The odors from the operation of the project would include the occasional odors from trash and recycling, and odors from the gasoline service station. Fuel pumps and on-site trash facilities would be located approximately 200 feet from the nearest sensitive receptor, which is located adjacent to the western boundary of the project site. However, trash would be stored in enclosed containers and be subject to regular maintenance and removal.

Additionally, the project is required to comply with SCAQMD Rule 461 (Gasoline Transfer and Dispensing), which requires fuel tanks to have ARB- certified vapor recovery systems, as well as vent valves, which would reduce the potential for release of odor from these sources. Therefore, because of the distance to the nearest receptor, air dispersion shortly after the release of short-term odors, the use of trash enclosures, and compliance with SCAQMD Rule 461, potential odor emissions would be considered less than significant, and with compliance of all applicable ordinances and rules related to odor, no mitigation would be required.

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4a. 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, and Biological Resources Assessment, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2a; MSHCP Consistency Analysis, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2b)*

Less Than Significant With Mitigation Incorporated – The Main Street Plaza project site and surrounding area is mostly urbanized, though the site itself is vacant with no natural habitat. Based on a biological field survey of the site, the Biological Resources Assessment and Multiple Species Habitat Conservation Plan (MSHCP) analysis provided in Appendix 2a and 2b determined that because the site has been subject to historic human disturbances and does not contain any suitable habitat for

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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any Federal or State listed species, no further surveys would be required to implement the Project. However, although no nesting birds were observed on site, the following mitigation measure shall be implemented to prevent any impacts to nesting birds:

MM 4-1 *The State of California prohibits the “take” of active bird nests. To avoid an illegal take of active bird nests, any grubbing, brushing or tree removal should be conducted outside of the the State identified nesting season (nesting season is February 15 through September 15). Alternatively, the site shall be evaluated by a qualified biologist prior to the initiation of ground disturbance to determine the presence or absence of nesting birds. Active bird nests MUST be avoided during the nesting season. If an active nest is located in the project construction area it will be flagged and a 300-foot avoidance buffer placed around it. No activity shall occur within the 300-foot buffer until the young have fledged the nest.*

The MSHCP is a criteria-based plan that includes identification of planning units on which to base the Criteria; the MSHCP analysis (Appendix 2b) indicates that the site is not mapped within a criteria cell or subunit and the Project is consistent with the MSHCP policies, which includes: Riparian/Riverine Areas/Vernal Pools; Narrow Endemic Plant Species; Urban/Wildlands Interface; and Surveys for Special Status Species (burrowing owls). No evidence of burrowing owl (BUOW) was found in the survey area, no burrows of appropriate size, aspect or shape were located and no BUOW pellets, feathers or white wash were found, no burrowing owl individuals were located, and no suitable burrows for BUOW were present. Based on the survey results, no mitigation is required.

With the implementation of the above mitigation measure, the project would have a less than significant impact, 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. No further mitigation is necessary.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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4b. 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 Biological Resources Assessment, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2a; MSHCP Consistency Analysis, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2b)*

Less Than Significant Impact – As previously stated, the proposed project site is located within a developed area, surrounded by a mixture of residential development, industrial development and transportation infrastructure. Because the project site is vacant and is within a developed area, the project site and surrounding area do not contain any riparian habitat or other sensitive natural community resources. The MSHCP analysis confirmed that no riparian areas exist within or will be affected by the Project. Therefore, no significant adverse impact to riparian habitat or any native biological resources would occur from implementing the proposed project. No mitigation is required.

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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
other means?				

4c. Response: *(Source: City of Riverside GIS/CADME USGS Quad Map Layer, and Biological Resources Assessment, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2a; MSHCP Consistency Analysis, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2b)*

No Impact – The biological resources report (Appendix 2a and 2b) concluded that the site contained no federally protected wetlands. Therefore, implementation of the proposed Project has no potential to 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. No mitigation is required.

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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4d. Response: *(Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage and Biological Resources Assessment, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2a; MSHCP Consistency Analysis, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2b)*

Less Than Significant With Mitigation Incorporated – The MSHCP analysis concluded that the Project site does not provide wildlife connectivity between blocks of habitat and is therefore consistent with MSHCP policies and conditions for Urban/Wildlands Interface. However, mitigation measure MM 4-1 address any potential impacts to migratory/nesting birds and BUOW. With implementation of mitigation measures identified in the discussion under response 4a, impacts under this issue are considered less than significant.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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4e. Response: *(Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual, and Biological Resources Assessment, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2a; MSHCP Consistency Analysis, Main Street Plaza Project, March, 17, 2017, provided as Appendix 2b)*

Less Than Significant With Mitigation Incorporated – Please refer to the discussion under response 4a. The MSHCP analysis (Appendix 2b) concluded the following:

- 1) The site is not located within an area mapped for Narrow Endemic or Criteria Area Plant Species and is therefore consistent with MSCHP polices and conditions for Narrow Endemic and Criteria Area plant species;
- 2) The Project site does not provide wildlife connectivity between blocks of habitat and is therefore consistent with MSCHP polices and conditions for Urban/Wildlands Interface;
- 3) Habitat Assessment and surveys for burrowing owl were conducted with the project area in 2017. The result of this survey is that there were no burrowing owls or sign of burrowing owl use observed in the parcel or in the surrounding areas. Therefore the project is not likely to impact burrowing owls.

However, the MSHCP analysis recommended mitigation measure the following mitigation measure to prevent any significant impacts to BUOW upon implementation of the proposed Project:

MM 4-2 *Pre-construction presence/absence surveys for burrowing owl within the survey area where suitable habitat is present will be conducted for all Covered Activities through the life the permit. Surveys will*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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be conducted within 30 days prior to disturbance. Take of active nests will be avoided. Passive relocation (use of one way doors and collapse of burrows) will occur when owls are present outside the nesting season.

No other local policies or ordinances protecting biological resources are applicable to the proposed Project, therefore, with implementation of the identified mitigation measure, any impacts under this issue are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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4f. Response: *(Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens’ Kangaroo Rat Habitat Conservation Plan, Lake Mathews Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan and, Biological Resources Assessment, Main Street Plaza Project, provided as Appendix 2a; MSHCP Consistency Analysis, Main Street Plaza Project, provided as Appendix 2b)*

Less Than Significant Impact – Please refer to the discussion under response 4a and 4e above. The MSHCP analysis (Appendix 2b) concluded that the Project is consistent with MSHCP policies. Therefore, the Project does not have a significant potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

5. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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, and Phase I Historical/Archaeological Resources Survey: Main Plaza-Riverside Project, 2234 Main Street and 2225-2243 Orange Street, City of Riverside, Riverside County, California, CRM TECH, February 24, 2017, provided as Appendix 3)*

Less Than Significant Impact – CEQA establishes that "a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (PRC §21084.1). "Substantial adverse change," according to PRC §5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

Since 2006, the entire project area has remained vacant and undeveloped. Because of the construction, redevelopment, and demolition activities reflected in the historical sources, there are no historical resources as defined in § 15064.5 of the CEQA Guidelines. Therefore, no historical sites or isolates were recorded within the Project boundaries; thus, none of them requires further consideration during this study. Any impacts under this issue are considered less than significant and no mitigation is required.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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, and Phase I Historical/Archaeological*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Resources Survey: Main Plaza-Riverside Project, 2234 Main Street and 2225-2243 Orange Street, City of Riverside, Riverside County, California, CRM TECH, February 24, 2017—Provided as Appendix 3)

Less Than Significant Impact With Mitigation Incorporated – As stated in the discussion above, and as indicated in the Cultural Resources Report provided as Appendix 3 to this Initial Study, no potential “historical resources” or “tribal cultural resources” were previously recorded within the project area, and none were encountered during the present survey. All buildings that were once located in the project area have been removed, and none of them has left any identifiable archaeological remains. Additionally, due to the extent of past ground disturbances on the property. The overall sensitivity of the project area for buried archaeological deposits from the prehistoric or historic period appears to be relatively low. Based on these findings, the present study concludes that no “historical resources” or “tribal cultural resources” exist within or adjacent to the project area. Thus, the following conclusions have been reached regarding the Project:

- No “historical resources” or “tribal cultural resources” exist within or adjacent to the project area, and thus the project as currently proposed will not cause a substantial adverse change to any known “historical resources” or “tribal cultural resources.”
- No further cultural resources investigation is necessary for the proposed project unless development plans undergo such changes as to include areas not covered by this study.

However, if buried cultural materials are discovered during any earth-moving operations associated with the Project, the following mitigation measure shall be implemented:

MM 5-1 *In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:*

1. *Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and*
2. *Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:*
 - a. *Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;*
 - b. *A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;*
 - c. *For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default.*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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With the above mitigation measure, as well as the mitigation measures provided under section 17, Tribal Cultural Resources below, the potential for impact to cultural resources will be reduced to a less than significant level.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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5c. Response: (Source: General Plan 2025 Policy HP-1.3, and Phase I Historical/Archaeological Resources Survey: Main Plaza-Riverside Project, 2234 Main Street and 2225-2243 Orange Street, City of Riverside, Riverside County, California, CRM TECH, February 24, 2017—Provided as Appendix 3))

Less Than Significant Impact With Mitigation Incorporated – The potential for discovering paleontological resources during development of the Project is considered highly unlikely based on the fact that the site has been previously engineered and disturbed at depth. No unique geologic features are known or suspected to occur on or beneath the sites. However, because any potential remaining resources within the Project area would be located beneath the surface and can only be discovered as a result of ground disturbance activities, the following measure shall be implemented:

MM 5-2 Should any paleontological resources be accidentally encountered during construction of these facilities, earthmoving or grading activities within 100 feet of the find shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City onsite inspector. The paleontological professional shall assess the find, determine its significance, and make recommendations for appropriate management actions within the guidelines of the California Environmental Quality Act.

With incorporation of this mitigation measure, the potential for impact to paleontological resources will be reduced to a less than significant level.

d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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5d. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, , and Phase I Historical/Archaeological Resources Survey: Main Plaza-Riverside Project, 2234 Main Street and 2225-2243 Orange Street, City of Riverside, Riverside County, California, CRM TECH, February 24, 2017—Provided as Appendix 3)

Less Than Significant Impact – As noted in the discussion above, no available information suggests that human remains may occur within the APE and the potential for such an occurrence is considered very low. State law (Section 7050.5 of the Health and Safety Code) as well as local laws require that the Police Department, County Sheriff and Coroner's Office receive notification if human remains are encountered. Compliance with these laws is considered adequate mitigation for potential impacts.

6. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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6ai. Response: *(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Report)*

Less Than Significant Impact – The Project site is located in the City of Riverside, which is located between two active faults—the Elsinore Fault to the southwest and the San Jacinto Fault to the east/northeast—as shown by the Riverside General Plan 2025 Regional Fault Zone Map (Figure 6-1). According to the California Geologic Survey, the site is not located in an Alquist-Priolo Earthquake Fault Zone (Figure 6-2). Based on this information, the risk for ground rupture at the site location is low; therefore, it is not likely that future customers and employees of the gas station and car wash will be subject to rupture from a known earthquake fault. Therefore, any impacts under this issue are considered less than significant; no mitigation is required.

ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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6aii. Response: *(Source: General Plan 2025 FPEIR Appendix E – Geotechnical Report)*

Less Than Significant Impact – As stated in the discussion above, several faults traverse the region surrounding the City, and as with much of southern California, the proposed structures will be subject to moderate to strong seismic ground shaking impacts should any major earthquake occur in the future. The United States Geologic Survey map illustrates the large number of faults in the area surrounding the City of Riverside (Figure 6-3). As a result, and like all other development projects in the City and throughout the Southern California Region, the proposed project will be required to comply with all applicable seismic design standards contained in the 2010 California Building Code (CBC), including Section 1613-Earthquake Loads. Compliance with the CBC will ensure that structural integrity will be maintained in the event of an earthquake. Therefore, impacts associated with strong ground shaking will be less than significant without mitigation.

iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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6aiii. Response: *(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report)*

Less Than Significant Impact – According to the map prepared for the Riverside General Plan 2025 regarding Liquefaction Zones, the project site is located in an area with low potential for liquefaction (Figure 6-4). Additionally, the General Plan FPEIR Map shows areas with soils that have high shrink-swell potential (Figure 6-5) and the project site is not in an area with soils that have a high shrink-swell potential. Given the above information, implementation of the Project will have a less than significant potential to expose people or structures to seismic-related ground failure, including liquefaction.

iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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6aiv. 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, and for projects over 1 acre: Storm Water Pollution Prevention Plan SWPPP)*

No Impact – The Riverside General Plan 2025 states that landslides and rock falls do occur within the City; the areas considered highly susceptible to such events are on steep slopes in excess of 30 percent. According to the General Plan map showing Areas Underlain By Steep Slope within the City (Figure 6-6), the project site is underlain by a 0-10% slope. Therefore, as the project site is not in an area with a slope that is considered highly susceptible to landslides and rock falls, no such events are anticipated.

b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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6b. Response: *(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code, and for projects over 1 acre: SWPPP)*

Less than Significant Impact – The proposed Project site is currently vacant; portions of the site have been compacted, but generally the site slopes from southwest to northeast (the highest point borders Orange Street; the lowest point borders Main Street). Once constructed, the potential for substantial soil erosion or loss of topsoil will be minimal as the entire site will be developed and covered with concrete with the exception of mandatory landscaping throughout the site. However, because construction of the Project will require grading in order to make the two portions of the site level with a sloping drive aisle connecting the portion of the site facing Orange Street (drive-thru restaurant) to the portion of the site facing Main Street (Arco/AM/PM/car wash), when soils are exposed temporary soil erosion may occur, which could be exacerbated by rainfall. Project grading would be managed through the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), and will be required to implement best management practices to achieve concurrent water quality controls after construction is completed and the Main Street Plaza is in operation. Therefore, any impacts under this issue would be considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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)*

Less Than Significant Impact – Please refer to issues 6iii and 6iv above. The Project site is currently vacant; portions of the site have been graded, but generally the site slopes from southwest to northeast (the highest point borders Orange Street; the lowest point borders Main Street). The General Plan indicates that the site is not on an area where landslides occur, and therefore are not of concern for the Project. Additionally, the General Plan liquefaction map (Figure 6-4) shows that the Project site is in an area with low potential for liquefaction, and also is underlain by soils that have a low shrink-swell potential (Figure 6-5). Thus, based on the above information, the proposed project is not located on a geologic unit 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. Any impacts under this issue are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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6d. Response: *(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)*

Less Than Significant Impact – The proposed Project is located on mainly Pachappa soil with a portion of the site underlain by Buren soil according to the Soils map prepared for the Riverside General Plan 2025 (Figure 6-7). These soils have a low to moderate shrink-swell potential. As stated in the preceding sections, the City General Plan indicates that the soils that underlay the project site are not considered expansive (Figure 6-5). Thus, the Project will not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and therefore will not have a potential to create substantial risks to life or property. Impacts under this issue are considered less than significant.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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6e. Response: *(Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)*

No Impact – The Main Street Plaza project area will be served by the existing wastewater collection system (sewer) through the Riverside Water Company, as shown in the site plan (Figure 3); the Project does not propose to utilize septic tanks or alternative onsite disposal systems. Therefore, the Project does not rely on such soils and no adverse impacts can result under this issue.

7. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7a. Response: *(Source: Air Quality and GHG Impact Analyses, Main Street Plaza, City of Riverside, California, prepared by Giroux & Associates, February 22, 2017, provided as Appendix 1)*

Less Than Significant Impact – “Greenhouse gases” (so called because of their role in trapping heat near the surface of the earth) emitted by human activity are implicated in global climate change, commonly referred to as “global warming.” These greenhouse gases contribute to an increase in the temperature of the earth’s atmosphere by transparency to short wavelength visible sunlight, but near opacity to outgoing terrestrial long wavelength heat radiation in some parts of the infrared spectrum. The principal greenhouse gases (GHGs) are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. For purposes of planning and regulation, Section 15364.5 of the California Code of Regulations defines GHGs to include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. Fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. Industrial and commercial sources are the second largest contributors of GHG emissions with about one-fourth of total emissions.

California has passed several bills and the Governor has signed at least three executive orders regarding greenhouse gases. GHG statutes and executive orders (EO) include AB 32, SB 1368, EO S-03-05, EO S-20-06 and EO S-01-07.

AB 32 is one of the most significant pieces of environmental legislation that California has adopted. Among other things, it is designed to maintain California’s reputation as a “national and international leader on energy conservation and environmental stewardship.” It will have wide-ranging effects on California businesses and lifestyles as well as far reaching effects on other states and countries. A unique aspect of AB 32, beyond its broad and wide-ranging mandatory provisions and dramatic GHG reductions are the short time frames within which it must be implemented. Major components of the AB 32 include:

- Require the monitoring and reporting of GHG emissions beginning with sources or categories of sources that contribute the most to statewide emissions.
- Requires immediate “early action” control programs on the most readily controlled GHG sources.
- Mandates that by 2020, California’s GHG emissions be reduced to 1990 levels.
- Forces an overall reduction of GHG gases in California by 25-40%, from business as usual, to be achieved by 2020.
- Must complement efforts to achieve and maintain federal and state ambient air quality standards and to reduce toxic air contaminants.

Statewide, the framework for developing the implementing regulations for AB 32 is under way. Maximum GHG reductions are expected to derive from increased vehicle fuel efficiency, from greater use of renewable energy and from increased structural energy efficiency. Additionally, through the California Climate Action Registry (CCAR now called the Climate Action Reserve), general and industry-specific protocols for assessing and reporting GHG emissions have been developed. GHG sources are categorized into direct sources (i.e. company owned) and indirect sources (i.e. not company owned). Direct

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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sources include combustion emissions from on-and off-road mobile sources, and fugitive emissions. Indirect sources include off-site electricity generation and non-company owned mobile sources.

In response to the requirements of SB97, the State Resources Agency developed guidelines for the treatment of GHG emissions under CEQA. These new guidelines became state laws as part of Title 14 of the California Code of Regulations in March 2010. The CEQA Appendix G guidelines were modified to include GHG as a required analysis element. A project would have a potentially significant impact if it:

- Generates GHG emissions, directly or indirectly, that may have a significant impact on the environment, or,
- Conflicts with an applicable plan, policy or regulation adopted to reduce GHG emissions.

Section 15064.4 of the Code specifies how significance of GHG emissions is to be evaluated. The process is broken down into quantification of project-related GHG emissions, making a determination of significance, and specification of any appropriate mitigation if impacts are found to be potentially significant. At each of these steps, the new GHG guidelines afford the lead agency with substantial flexibility.

Emissions identification may be quantitative, qualitative or based on performance standards. CEQA guidelines allow the lead agency to “select the model or methodology it considers most appropriate.” The most common practice for transportation/combustion GHG emissions quantification is to use a computer model such as CalEEMod, as was used in the ensuing analysis.

The significance of those emissions then must be evaluated; the selection of a threshold of significance must take into consideration what level of GHG emissions would be cumulatively considerable. The guidelines are clear that they do not support a zero net emissions threshold. If the lead agency does not have sufficient expertise in evaluating GHG impacts, it may rely on thresholds adopted by an agency with greater expertise.

On December 5, 2008 the SCAQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.) of 10,000 Metric Tons (MT) CO₂ equivalent/year. In September 2010, the SCAQMD CEQA Significance Thresholds GHG Working Group released revisions, which recommended a threshold of 3,000 MT CO₂e for all land use projects. This 3,000 MT/year recommendation has been used as a guideline for this analysis. In the absence of an adopted numerical threshold of significance, project related GHG emissions in excess of the guideline level are presumed to trigger a requirement for enhanced GHG reduction at the project level.

Project Related GHG Emissions Generation

Construction Activity GHG Emissions

The project is assumed to require less than two years for construction. During project construction, the CalEEMod2016.3.1 computer model predicts that the construction activities will generate the annual CO₂e emissions identified in Table 7-1.

Table 7-1
CONSTRUCTION EMISSIONS (METRIC Tons CO₂e)

	CO₂e
Year 2017	246.7
Year 2018	1.7
Total	248.4
Amortized	8.3

CalEEMod Output provided in appendix

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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SCAQMD GHG emissions policy from construction activities is to amortize emissions over a 30-year lifetime. The amortized level is also provided. GHG impacts from construction are considered individually less-than-significant.

Project Operational GHG Emissions

The input assumptions for operational GHG emissions calculations, and the GHG conversion from consumption to annual regional CO₂e emissions are summarized in the CalEEMod2016.3.1 output files found in the appendix of this report. The total operational and annualized construction emissions for the proposed project are identified in Table 7-2.

**Table 7-2
PROPOSED USES OPERATIONAL EMISSIONS**

Consumption Source	MT CO₂e
Area Sources	0.1
Energy Utilization	100.2
Mobile Source	1705.4
Solid Waste Generation	14.5
Water Consumption	5.7
Construction	8.3
Total	1,834.2
Guideline Threshold	3,000
Exceeds Threshold?	No

Total project GHG emissions are substantially below the proposed significance threshold of 3,000 MT suggested by the SCAQMD. Therefore, the Project will not result in generation of a significant level of greenhouse gases. Impacts are considered less than significant and no mitigation is required.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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7b. Response: *(Source: Air Quality and GHG Impact Analyses, Main Street Plaza, City of Riverside, California, prepared by Giroux & Associates, February 22, 2017, provided as Appendix 1)*

Less Than Significant Impact – Please refer to the discussion presented under 7a above. The City of Riverside has developed a Green Riverside Greenhouse Gas Reduction Plan though not a formal Climate Action Plan. The City has not adopted regulations for the purpose of reducing GHGs applicable to this project. The applicable GHG planning document is AB-32. As discussed above, the project is not expected to result in a significant increase in GHG emissions and is below the recommended SCAQMD 3,000 ton threshold. Therefore, the project would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions, impacts are considered less than significant and no mitigation is required.

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 hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

8a. Response: *(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan)*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Less Than Significant Impact – The proposed Project consists of developing the western portion of the site with a service station, convenience store, and car wash; the east portion of the site will contain a drive-thru restaurant and a drive aisle that connects to the service station. During construction of the proposed Project, hazardous or potentially hazardous materials will be routinely handled in small quantities on the project site. These hazardous materials would include gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment and vehicles; therefore, there is a potential for accidental release of petroleum products in sufficient quantity to pose a significant hazard to people or the environment. A permitted and licensed service provider will conduct the removal of such hazardous materials; any handling, transporting, use or disposal of hazardous materials would comply with all applicable federal, State, and local agencies and regulations. Additionally, due to the potential on-site use and storage of hazardous and flammable materials, the Project would also require an Emergency/Contingency Plan that would establish procedures to follow in the event of an emergency situation (such as a fire or hazardous spill). The City of Riverside Fire Department provides oversight for this Plan. The SWPPP will ensure that no accidental releases of hazardous or potentially hazardous materials during construction will result in a significant hazard. During the operation phase of the Project, gasoline and diesel fuel—which are considered hazardous materials—will be routinely handled, stored, and dispensed on the project site. Because the Project will include a gas station, underground storage tanks (UST) will store gas and diesel on the project site, as shown in Figure 3 (site plan). The UST will consist of double-walled, fiberglass fuel storage tank with leak detection sensors. Because of the nature of the proposed Project, and in particular the gas station, the project will be subject to routine inspection by federal, State, and local regulatory agencies with jurisdiction over fuel dispensing facilities. These regulations and regulatory agencies include: provisions established by Section 2540.7, Gasoline Dispensing and Service Stations, of the California Occupational Safety and Health Regulations; Chapter 38, Liquefied Petroleum Gases, of the California Fire Code; Resource Conservation and Recovery Act; and the City of Riverside Fire Department. Under the above provisions—the routine inspection of the gas station, the permitted USTs, and all associated fuel delivery infrastructure, as well as compliance with all federal, state, and local regulations—the Project will operate in a manner that poses no substantial hazards to the public or environment.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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8b. Response: *(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM’s Strategic Plan)*

Less Than Significant Impact – Please see the discussion under issue 8a. During both construction and operations the Project will handle hazardous or potentially hazardous materials on site. During construction, these materials may be routinely handled in small quantities on the project site; and during the operation phase of the Project, gasoline and diesel fuel will be routinely handled, stored, and dispensed on the project site. In order to prevent any significant hazard to the public through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, the Project must prepare and implement an Emergency/Contingency Plan that would establish procedures to follow in the event of an emergency situation (such as a fire or hazardous spill). The City of Riverside Fire Department will oversee this Plan. This Plan will mitigate any potential hazards from the conditions listed above. Additionally, implementation of the SWPPP will ensure that any accidental spills or leakage of hazardous materials will be remediated properly. Thus, with the implementation of the SWPPP and Emergency Plan, as well as the routine inspection by federal, State, and local regulatory agencies with jurisdiction over fuel dispensing facilities, impacts under this issue can be lowered to a less than significant level.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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8c. Response: *(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools,*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, SCQAMD Heath Risk Assessment for Gas Stations, http://www.aqmd.gov/docs/default-source/planning/risk-assessment/gas_station_hra.pdf?sfvrsn=0

Less Than Significant Impact – The proposed project site is located within 1000 feet of Fremont Elementary School, 1925 Orange St, Riverside, CA 92501, which is part of the Riverside Unified School District. As previously stated, all hazardous or potentially hazardous materials would be stored and handled in accordance with all applicable federal, state, and local agencies and regulations pertaining to the handling and use of hazardous materials. Adherence to these policies and regulations, as well as the implementation of the above mitigation measure will ensure that the Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school during either construction or operations of the Project. Additionally, the SCQAMD released a Health Risk Assessment for Gas Stations within its jurisdiction and the residential cancer risk (in one million persons) for Gasoline Service Stations at a distance of 1000 feet away from the nearest resident was 0.01 at the nearest location (Riverside, CA) to the Main Street Plaza site. Thus, the increased chance of health risk to the public that would result from implementing a gas station at this location at that distance is miniscule. Therefore, any impacts under this issue are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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8d. Response: (Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites, California State Water Resources Control Board GeoTracker)

Less Than Significant Impact – The Project site is currently vacant, has been graded and previously disturbed. The project will not be located on a site that is included on a list of hazardous materials sites that are currently under remediation. According to the California State Water Board’s GeoTracker website (consistent with Government Code Section 65962.5), which provides information regarding Leaking Underground Storage Tanks (LUST), there are several LUST cleanup sites within a 2,500-foot radius of the Project site (Figure 8-1). One of these cleanup sites is on the Project site and was a former Shell gas station with a gasoline leak (Figure 8-2); however, this site was considered fully remediated as of 2002, and therefore is not of concern for the proposed Project because it proposes a similar use, but will implement measures (such as an underground storage tank that can sense any potential leaks) to prevent a future occurrence of this type. This cleanup site will therefore, not affect implementation of the Project at this site. The Department of Toxic Substances Control EnviroStor Database Listed Sites map (Figure 8-3) shows that two active, and one inactive cleanup sites are within a 2,500-foot radius of the Project site. None of these sites are on or adjacent to the site and therefore have no potential to create a significant hazard to the public or the environment as a result of Project implementation. Based on the above information, the proposed project is not located on a site including on a list of hazardous materials sites, and therefore will not create a significant hazard to the public or environment.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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8e. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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No Impact – There nearest public airports are Flabob Airport, which is located approximately 2.5 miles to the west of the Project site, and the Riverside Municipal Airport approximately 6 miles to the southwest of the project site. According to the City of Riverside General Plan 2025 Airport Land Use Compatibility and Influence Areas map—provided as Figure 8-4—the project site is not located within the designated planning boundary; therefore, the project area has no potential to cause or experience any routine or substantial adverse impact related to public airport operations. No impacts will occur as a result of project implementation.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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8f. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP)

No Impact – There are no private airstrips located within two miles of the Project site. Therefore, the project area has no potential to cause or experience any adverse impact related to private airstrip operations. No impacts will occur as a result of project implementation.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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8g. Response: (Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM’s Strategic Plan)

Less Than Significant Impact – The Main Street Plaza site is not located along any identified evacuation route within the City of Riverside. According to the City of Riverside General Plan 2025 Evacuation Routes Map (Figure 8-5), the nearest portion of the identified evacuation route is the SR 60 freeway just northeast of the Project site. Additionally, there is a traffic signal just southwest of the Project site (at Main Street and Spruce Street) that is considered part of the infrastructure that can influence response times during a major disaster. Implementation of the Project at this location will not impair implementation of or physically interfere with the identified emergency evacuation plan. Any impacts under this issue are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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8h. Response: (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside’s EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM’s Strategic Plan)

No Impact – According to the Fire Hazard Areas map in the City of Riverside General Plan 2025 (Figure 8-6), the proposed Project site is not located in an area of concern for fire hazards. Therefore, Project implementation would not result in a potential to expose people or structures to fire hazards. Potential project-related impacts are less than significant; no mitigation measures are required.

9. HYDROLOGY AND WATER QUALITY.				
Would the project:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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9a. Response: (Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water)

Less Than Significant Impact – The proposed Main Street Plaza site is located in a developed area and is on a site that once contained a gas station on the portion of the site in which the Project will support a the gas station, convenience store, and car wash. The surface of the site consists entirely of dirt; portions of the site have been compacted, but generally the site slopes from southwest to northeast (the highest point borders Orange Street; the lowest point borders Main Street). For a developed area, the only three sources of potential violation of water quality standards or waste discharge requirements are from generation of municipal wastewater, stormwater runoff, and potential discharges of pollutants, such as accidental spills. Municipal wastewater is delivered to the Public Works Department, which meets the waste discharge requirements imposed by the Santa Ana Regional Water Quality Control Board (RWQCB). To address stormwater and accidental spills within this environment, any new project must ensure that site development implements a Storm Water Pollution Prevention Plan (SWPPP) and a National Pollutant Discharge Elimination System (NPDES) to control potential sources of water pollution that could violate any standards or discharge requirements during construction and a Water Quality Management Plan (WQMP) to ensure that project-related after development surface runoff meets discharge requirements over the short- and long-term. Because the project slopes from southwest to northeast and currently does not contain any impervious surface, the Project has identified onsite drainage to prevent the project from discharging any polluted runoff; this is outlined in the Preliminary Grading Plans (Figures 4-6). This is discussed in detail under issues c-e below. The SWPPP would specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential water pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. With implementation of these mandatory Plans and their BMPs, the Project would have a less than significant impact under this issue.

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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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9b. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, RPU Urban Water Management Plan, WMWD Urban Water Management Plan)

Less Than Significant Impact – The Project does not propose the installation of any water wells that would directly extract groundwater and the change in pervious surfaces to impervious surfaces will be minimal because the site itself is not large at only 1.99-acres. The project site is located in the Riverside South Waterbasin. According to the Urban Water Management Plan (UWMP) in 2015 nearly all of Riverside Public Utility’s water was sourced from groundwater: in 2015 the actual supply of water was 75,126 acre feet (AF), 74,926 AF of which was sourced from groundwater. According to the City of Riverside General Plan 2025, 8% of the land use in the city is designated for commercial/industrial uses, which equates to approximately 4169.7 acres. The UWMP indicates that in 2015, the demand for raw and potable water in the commercial/industrial sector was 8,950 acre feet per year (AFY). The proposed project will encompass 1.99-acres, which represents 0.047% of the land designated for commercial/industrial use. The Project is therefore estimated to require approximately 4.2 AFY ($0.00047 \times 8,950 = 4.2$) in order to support the needs of the Project. This increase is well below the amount of projected groundwater supply available for 2020 (88773 AF—approximately 13,000 AF more groundwater than in 2015), and is within the anticipated demand for raw and potable water for commercial/industrial land uses projected for 2020 (9,959 AF—approximately 1000 AF more than in 2015). Thus, the Project is not forecast to cause a significant demand for new groundwater supplies. The potential impact under this proposed Project is considered less than significant; no mitigation measures other than the installation of standard water conservation fixtures and use of xerophyte landscaping are required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
or river, in a manner which would result in substantial erosion or siltation on- or off-site?				

9c. Response: (Source: Preliminary grading plan)

Less Than Significant Impact – Impacts to the existing drainage pattern of the site or area could occur if development of the Project results in substantial on- or off- site erosion or siltation. The Project will not alter the course of a stream or river because none exist on or in the immediate vicinity of the site. The surface of the site consists entirely of dirt; portions of the site have been compacted, but generally the site slopes from southwest to northeast (the highest point borders Orange Street; the lowest point borders Main Street). The project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) for the prevention of polluted runoff during construction. Erosion, siltation and other possible pollutants associated with long-term implementation of projects are addressed as part of the Water Quality Management Plan (WQMP) and grading permit process. BMP implementation would maintain soil stability and potential water quality of any storm water discharges from the project site.

During operation of the site as the Main Street Plaza, the drainage pattern of the site will be altered from that which currently exists because the site is partially pervious at present and Impervious coverage of the site as proposed is anticipated to be about 76% (landscaped area will be 24% of the site). This will not result in substantial erosion or siltation on- or off-site because runoff will be contained on site through several drainage BMPs. These BMPs include pervious pavers, infiltration trenches, a catch basin with filter inserts, and a bioretention basin (Preliminary Grading Plan: Figures 4-6). Thus, although the amount of onsite surface flows would potentially increase as a result of the increased quantity of impervious surfaces found on the project site, under the project conditions, the amount of onsite flows being conveyed offsite will decrease, as a larger percentage of flows will be contained at the project site and within on site drainage features. Therefore, with the implementation of onsite drainage, the NPDES requirements, SWPPP, and subsequent WQMP BMPs, implementation of the Project will not substantially alter the drainage pattern of the site in a manner that would result in substantial erosion or siltation onsite or offsite due to the construction of onsite drainage. Any impacts under this issue are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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9d. Response: (Source: Preliminary grading plan)

Less Than Significant Impact – Please refer to the discussion under Issue 9c above. Impacts to the existing drainage pattern of the site or area could occur if the development of the Project results in an increased amount of flooding onsite or offsite. As stated above, the project site's surface currently consists entirely of dirt; portions of the site have been compacted, but generally the site slopes from southwest to northeast (the highest point borders Orange Street; the lowest point borders Main Street). Under the proposed Project, onsite surface flows will be collected and conveyed in a controlled manner through the project site, directed toward several drainage management features including pervious pavers (with infiltration), infiltration trenches, a catch basin with filter inserts, and a bioretention basin (Preliminary Grading Plan: Figures 4-6). These drainage management features will allow runoff to be infiltrated and then stored onsite and therefore would prevent onsite flooding; thus, no offsite flooding is anticipated. Therefore, implementation of the Project will not result in flooding on- or off-site, and any impacts under this issue are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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9e. Response: (Source: Preliminary Grading Plan)

Less Than Significant Impact – Please refer to response 9c and 9d above, the Project will not substantially create or contribute runoff water that would exceed the capacity of existing or planned stormwater capacity, or provide substantial additional sources of polluted water. The Project is subject to NPDES requirements, and will require implementation of a SWPPP and WQMP, which include BMPs that would ensure that discharge of polluted material does not occur or is remediated in the event of an accidental spill. However, in most cases onsite surface flows will be collected and conveyed to several drainage management features (outlined in the preceding sections). At present, the site is partially pervious, with runoff either percolating into the soil onsite or flowing offsite into adjacent roadways. During operation of the Project as the Main Street Plaza, the amount of impervious surface will be 76%, with 24% of the site serving as onsite landscaping. With the construction of onsite drainage features, stormwater will be infiltrated and stored onsite with little to no discharged flow into adjacent roadways. Thus, with implementation of the proposed Project, the area drainage should improve due to substantially less stormwater flowing off-site. Therefore, with the implementation of the above required permits, any impacts under this issue are considered less than significant.

f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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9f. Response:

Less Than Significant Impact – Under the proposed project, a car wash will be constructed. The carwash will include a gray water recycling system, which will collect, treat, and filter gray water from previous car wash cycles for use with future car wash cycles. Through the use of this gray water recycling system, little or no gray water will be discharged into the municipal sewer system for wastewater treatment. Thus, the gray water will not further degrade water quality onsite; additionally, with the onsite drainage plan and the implementation of a NPDES, SWPPP, WQMP, and subsequent BMPs, any further impacts under this issue would be less than significant. There are no other conditions associated with the proposed Project beyond what is described above under responses to item 9c, 9d, and 9e above that could result in the substantial degradation of water quality. Therefore, no impacts are anticipated under this issue.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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9g. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps 06065C0726G)

No Impact – According to the City of Riverside General Plan 2025 Flood Hazard Areas Map (Figure 9-1), the proposed Project is not located in a flood hazard area. Additionally, according to the FEMA Flood Hazards Map, the Project site is not located within a 100-year flood hazard area. The Project does not propose any housing as part of its implementation. Therefore, the Main Street Plaza project would not 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. No impacts can occur under this issue.

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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9h. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps 06065C0726G)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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No Impact – As stated above, Figure 9-1 illustrates that the Project site is not located within a flood hazard zone, and the FEMA Flood Hazards Map indicates that the Project site is not located in a 100-Year flood plain, and therefore would not impede or redirect flood flows as none would occur at the project site. No impacts under this issue are anticipated.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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9i. Response: *(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps 06065C0726G)*

No Impact – According to the Flood Hazards map prepared for the Riverside General Plan 2025 (Figure 9-1), the Project site is not located in a dam inundation area. Therefore, there is no potential to 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 as a result of implementing the proposed Project.

j. Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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9j. Response: *(Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)*

No Impact – The project site is located more than 40 miles from the Pacific Ocean, which eliminates the potential for a tsunami to impact the project area. Additionally, a seiche would not occur within the vicinity of the project because no lakes or enclosed bodies of water exist near the site that could be impacted by such an event. Mudflow typically occurs on alluvial hillsides, and though the project slopes slightly, according to the City's General Plan, the project site is not located in an area susceptible to landslides, as discussed under issue 6aiv above, therefore, no such events are likely to cause any impacts within the project area. No impacts under this issue are anticipated.

10. LAND USE AND PLANNING: Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

10a. Response: *(Source: General Plan 2025 Land Use and Urban Design Element, Project site plan, City of Riverside GIS/CADME map layers)*

Less Than Significant Impact – The proposed Main Street Plaza Project will not physically divide an established community. The Project is situated within the Downtown Specific Plan: North Main Street Specialty Services District, which allows gas stations and drive-thru restaurants, subject to the approval of a Conditional Use Permit (CUP). The surrounding uses include a gas station to the south, a drive-thru restaurant to the west, a Caltrans park and ride lot and single family to the east, and the SR 60 highway to the north. Thus, the establishment of a new infill commercial development will be compatible and consistent with surrounding uses. As well, this project will be consistent with the standards and intent of the underlying DSP-NMS – Downtown Specific Plan – North Main Street District. Therefore, impacts are anticipated to be less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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*

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

Less Than Significant Impact – The General Plan land use designation is Downtown Specific Plan (DSP), and the zone classification is Downtown Specific Plan – North Main Street District (DSP-NMS). Under this designation, the Downtown Specific Plan: North Main Street Specialty Services District only allows gas stations (and associated car wash and convenience store facilities) and drive-thru restaurants within this Plan subject to the granting of a Conditional Use Permit (CUP). The project has been designed to be compatible with surrounding uses. No adverse impacts are anticipated under this issue.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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10c. 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, enter appropriate Specific Plan if one, 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)*

No Impact – The project site is located in an urban area. According to the City of Riverside General Plan 2025 figure showing habitat conservation plans within the City, there are no identified any habitat conservation planning areas or natural community conservation planning areas that would apply to the project area (Figure 10-1). Therefore, the proposed Main Street Plaza Project has no potential to conflict with such planning areas. No impacts are anticipated.

11. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

11a. Response: *(Source: General Plan 2025 Figure – OS-1 – Mineral Resources, California Surface Mining and Reclamation Policies and Procedures <http://www.conservation.ca.gov/smgf/guidelines/documents/classdesig.pdf>)*

Less Than Significant Impact – According to the City of Riverside General Plan Figure OS-1 (Figure 11-1 of this document), the Project site is located in an MRZ-3 zone, which indicates that the area contains known or inferred mineral occurrences of undetermined mineral significance; thus, no mineral resources are known on the Project site. This type of mineral resource zone is not considered to be a zone of valuable resources according to the State, which identifies MRZ-2 zones as important mineral resource zones. Therefore, development of the site as the Main Street Plaza will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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11b. Response: *(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)*

Less Than Significant Impact – Please refer to the discussion under issue 11a above. According to the map prepared for the City of Riverside General Plan 2025, the proposed project is in a zone with a classification of MRZ-3. The General Plan indicates that quarrying of mineral resources no longer plays a major role in the City's economy, with the exception of the areas classifies as MRZ-2 zones, as shown in the City of Riverside General Plan Figure OS-1 (Figure 11-1 of this document). Thus, because the Project is not in an area or on a site that contains locally important mineral resources according to the City of Riverside General Plan 2025, no significant adverse impacts will occur as a result of implementing the proposed project.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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-I – 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)*

Less Than Significant Impact – According to the 2003 Roadway Noise Figure and 2003 Freeway Noise Figure (Figures 12-1 and 12-2) prepared for the City of Riverside General Plan 2025, the background noise levels at the Project site are between 65 and 70 CNEL as a result of highway noise from SR 60 and roadway noise from Main Street. The closest receptors to the project site are the single-family residences south of the site on Orange Street and Russell Street. Short-term noise levels associated with project construction activities may impact these single-family residential dwellings. These activities will include noise generated by construction activities and movement of construction materials to and from the site. The noise of each of these construction activities varies depending on the type of construction equipment and the location within the site where the construction takes place. The project will comply with the City's Noise regulations during construction by limiting work hours to between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 5:00 p.m. on Saturdays or at any time on Sunday or federal holidays; however, construction noise during the limited work hours is exempt from the City's CNEL limiting Noise regulations. Therefore, through compliance with the City's noise standards, short-term construction impacts would not expose persons to or generate noise in excess of standards established by the City or by any other applicable agencies. Therefore, short-term construction impacts would be considered less than significant.

The Riverside General Plan 2025 FPEIR states that new construction or development should not be undertaken if it falls within the conditionally unacceptable range, unless noise reducing measures can be employed to reduce exposure to noise impacts.

During operation of the Project as a gas station and car wash, the traffic generated on-site from customers will not exceed the ambient noise levels that already exist at the Project site. However, the car wash may generate noise greater than the existing ambient noise level. In order to prevent any significant impacts the Applicant has submitted noise contours of the car wash to the City of Riverside that comply with the Title 7 of the City's Municipal Code; therefore the car wash is not anticipated to generate noise that is considered significant by City standards.

Additionally, the City's Municipal Code (7.35.010.B) prohibits loading and unloading activities and operation powered motor vehicles at unacceptable noise levels (greater than 80 CNEL dB, or plainly audible at a distance of 50 feet in any direction [7am-10pm] or 25 feet in any direction [10pm-7am]) across a residential property line or that at any time exceeds the permitted noise level for the underlying land use category. These ordinances would apply to any truck deliveries of gasoline or goods to be sold at the convenience store. The southernmost corner of the site may receive deliveries and would be within 120 feet of the nearest sensitive receptor. Therefore, the Project will comply with the City Municipal Code due to the distance from the nearest sensitive receptor, thereby preventing any significant impacts to nearby sensitive receptors. Thus, based on the existing noise circumstances within the vicinity of the project, there is a less than significant potential for a permanent impact under this issue.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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12b. 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, FPEIR*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Table 5.11-G – Vibration Source Levels For Construction Equipment, Appendix G – Noise Existing Conditions Report)

Less Than Significant Impact – Construction related activities although short term, are the most commons source of ground borne noise that could affect occupants of neighboring uses. The City’s Municipal Code Section 7.35.010 restricts operation of tools or equipment used in construction between the hours of 7 p.m. and 7 a.m. on weekdays and between 5 p.m. and 8 a.m. on Saturdays or at any time on Sunday or federal holidays. As construction activities are temporary and limited, the project will cause a less than significant exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels. This project is not expected to generate or be exposed to long-term vibration impacts, as no blasting or pile driving is foreseeable in conjunction with development of the project.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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-10 – Noise/Land Use Noise Compatibility Criteria, Table 5.11-I – 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)

Less Than Significant Impact – Please refer to the discussion under issue 12a above. The long-term permanent change in noise consists of the additional trips associate with full operation of the proposed Main Street Plaza. Due to the high background noise as a result of both traffic along Main Street and the SR 60 highway directly to the northeast and northwest of the Project site, the additional trips generated (3,314 trip ends per day) to the site each day would not cause a significant change in the existing noise on the project site. Once the Project is in operation, the Project will require delivery of gasoline, diesel, convenience store goods, and food/supplies for the drive-thru restaurant approximately five to six times a week for each of the two proposed businesses. Commercial truck delivery activities are not known at this time. Truck access to the project site will be via Main Street and Orange Street. Low speed and idling trucks can generate maximum noise levels of up to 79 dBA at 50 feet away; the nearest residence is approximately 250 feet away from the nearest loading zone on site, which means the sound level would drop to around 64 dBA at the nearest sensitive receptor. This level is at or below the level of noise generated from the roadway noise from Main Street and Highway Noise from SR 60. Therefore, no substantial permanent increase in ambient noise levels above existing levels will occur as a result of project implementation. The Project will be required to comply with the Noise Control standards outlined in the City Municipal Code, which prohibits the timing of noisy events in the evening. Thus, with no long-term increases in ambient noise levels, impacts under this issue are considered less than significant.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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12d. Response: (Source: FPEIR Table 5.11-J – Construction Equipment Noise Levels, Appendix G – Noise Existing Conditions Report)

Less Than Significant Impact – Please refer to the discussion under 12a above. The proposed project will involve construction operations that have the potential to cause short-term significant noise impacts. In the short term, excavation of the portion of the site designated for the USTs, and the construction of the car wash, gas station, and convenience store will result in noise generated by dozers, pavers, air compressors, welders, generators, and other noise generating equipment required to complete construction. Exterior noise-generating construction activities will be restricted to the hours identified in the City Municipal Code: 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 5:00 p.m. on Saturdays or at any time on Sunday or federal holidays.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Construction equipment generates noise that ranges between approximately 75 and 90 dBA at a distance of 50 feet. Refer to Table 12-1, which shows construction equipment noise levels at 25, 50 and 100 feet from the noise source.

**Table 12-1
NOISE LEVELS OF CONSTRUCTION EQUIPMENT AT
25, 50, 100, AND 200 FEET (in dBA LEQ) FROM THE SOURCE**

Equipment	Noise Levels at 25 feet	Noise Levels at 50 feet	Noise Levels at 100 feet	Noise Levels at 200 feet
Earthmoving				
Front Loader	85	79	73	67
Backhoes	86	80	74	68
Dozers	86	80	74	68
Tractors	86	80	74	68
Scrapers	91	85	79	73
Trucks	91	85	79	73
Material Handling				
Concrete Mixer	91	85	79	73
Concrete Pump	88	82	76	70
Crane	89	83	77	71
Derrick	94	88	82	76
Stationary Sources				
Pumps	82	79	70	64
Generator	84	78	72	66
Compressors	87	81	75	69
Other				
Saws	84	78	72	68
Vibrators	82	76	70	64

Source: U.S. Environmental Protection Agency "Noise"

The nearest residence is approximately 100 feet from the southern edge of the Project site. The short-term noise impacts associated with Project construction activities are forecast to be less than significant through compliance with the City Municipal Code—as addressed above. Compliance with the City Municipal Code will ensure that substantial temporary or periodic increases in ambient noise levels in the project vicinity will not cause a significant adverse impact.

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 expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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12e. Response: *(Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, RCALUCP, March Air Reserve Base/March inland Port Comprehensive Land Use Plan (1999), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005)*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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No Impact – The nearest public airports are Flabob Airport, which is located approximately 2.5 miles to the west of the Project site, and the Riverside Municipal Airport approximately 6 miles to the southwest of the project site. According to the Riverside General Plan 2025 Riverside and Flabob Airport Noise Contours map (Figure 12-3), the Project site is not located within the noise contours identified for either Airport. Therefore, the project area has no potential to expose people residing or working in the project area to excessive noise levels as a result of the site's proximity to an airport. No impacts will occur as a result of project implementation.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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12f. Response: *(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP, March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999) and Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005))*

No Impact – According to the General Plan FPEIR, there are no private airstrips located within the City that would expose people working or residing in the City to excessive noise levels. Therefore, the project has no potential to expose people residing or working in the project area to excessive noise levels as a result of the site's proximity to a private airstrip. No impacts will occur as a result of project implementation.

13. POPULATION AND HOUSING. Would 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

13a. Response: *(Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections–2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025, Capital Improvement Program and SCAG's RCP and RTP http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf)*

Less Than Significant Impact – According to the SCAG's profile for the City of Riverside (May 2015), the City had a population of 314,034 in 2014. The type of infill use planned for the project site is not of a type that would induce substantial population growth in the area. No housing is proposed as part of the project. Though construction of the Main Street Plaza will require a temporary work force, this is short-term and with a maximum of about 20 employees will not induce substantial population growth. Additionally, the number of employees needed to operate the Main Street Plaza's main sources of employment—the gas station and associated facilities and the drive-thru restaurant—will be between 20 and 30 employees. This nominal change in the work force within the City is well within the SCAG Population and Households Forecast of 339,000 in 2020, which includes 198,300 jobs, which is 70,801 more than there were in 2013 according to the SCAG profile of the City. Therefore, impacts under this issue are considered less than significant.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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13b. Response: *(Source: CADME Land Use 2003 Layer)*

No Impact – The proposed project will occur entirely within the boundaries of the vacant site. No housing exists on the Project site, and none will be affected upon Project implementation. Thus, no impact can occur under this issue. .

c. Displace substantial numbers of people, necessitating the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
construction of replacement housing elsewhere?				

13c. Response: *(Source: CADME Land Use 2003 Layer)*

No Impact – As stated in the discussion under issue 13b, the Main Street Plaza will be constructed entirely within the boundaries of the Project site. The site is entirely vacant and does not provide housing for any people. Therefore, implementation of the proposed Project will not displace a substantial number of people necessitating the construction of replacement housing elsewhere. No impacts are anticipated.

14. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

14a. Response: *(Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)*

Less Than Significant Impact – The City of Riverside receives fire protection services from the City of Riverside Fire Department (RFD). The nearest fire station is Station 1: Downtown and Fire Admin at 3401 University Avenue, Riverside, CA 92501, which is about 1.3 miles northeast of the Project site. This Station has the following fire protection aids at its disposal: 1 Battalion, 1 Engine, 1 Truck, 1 Squad, 1 Brush, and 1 Patrol. The Downtown Station is a Multi-Company Station, which responds to fires, hazardous materials responses, etc. with supplemental units. The average response time to fire calls is 5 minutes, 30 seconds. The Project proposes to construct a gas station, convenience store, and car wash on one portion of the site, and a drive-thru restaurant on the second portion of the site. The proposed Project would include the installation of fire hydrants to assist in combating potential fire hazards should they arise. As previously stated, due to the potential on-site use and storage of hazardous and flammable materials, the Project would also require an Emergency/Contingency Plan that would establish procedures to follow in the event of an emergency situation (such as a fire or hazardous spill). The City of Riverside Fire Department provides oversight for this Plan. Implementation of necessary maintenance, training and emergency preparation provided by the Emergency/Contingency Plan, would ensure that the Proposed Project would have a less than significant impact on fire protection services. Therefore, impacts under this issue are considered less than significant.

b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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14b. Response: *(Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)*

Less Than Significant Impact – The City of Riverside Police Department (RPD) provides police protection sources to the City of Riverside. According to the City of Riverside General Plan 2025 FEIR map showing the City's Policing Centers, the Project site is served by the Main Police Department on 4102 Orange Street, Riverside, CA 92501, which is in the North Riverside Policing Center (Figure 14-1). This location serves as the Police Headquarters for the City. The Project proposes to construct a gas station, convenience store, and car wash on one portion of the site, and a drive-thru restaurant on the second portion of the site. Development of the site, which currently contains a mostly vacant site, would introduce new structures, employment opportunities and customers to the project site. This would result in an incremental increase in demand for law enforcement services, but is not anticipated to require or result in the construction of new or physically altered law enforcement facilities. The RPD plans to build new operational bases in the North and East Neighborhood Policing Centers to provide four precinct offices over the next two decades (as of 2007). Thus, the RPD has planned growth based on it's growth in demand for service, which this Project will contribute to. Additionally, prior to the issuance of

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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building permits, the Applicant is required to comply with the provisions of the City of Riverside's Development Impact Fee Ordinance (City Municipal Code, Chapter 16), which requires a fee payment that the City applies to the funding of public facilities, including law enforcement facilities, vehicles, and equipment. Additionally, the Project is not expected to result in any unique or more extensive crime problems that cannot be handled with the existing and future Buildout planned level of police resources. No new or expanded police facilities would need to be constructed as a result of the project. Therefore, impacts to police protection resources from implementation of the proposed project are considered less than significant..

c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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14c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Figure 5.13-3 – AUSD Boundaries, Table 5.13-E – AUSD, Table 5.13-G – Student Generation for RUSD and AUSD By Education Level, and Figure 5.13-4 – Other School District Boundaries)

Less Than Significant Impact – The proposed project is located within the area served by Riverside Unified School District. The nearest school is Fremont Elementary School, located at 1925 Orange St, Riverside, CA 92501, which is less than one-quarter mile away from the Project site. As addressed above under section 13a above, the proposed project does not include any land uses that would substantially induce population growth, and will not require a substantial temporary or permanent labor force. Additionally, the payment of school fees is mandated and the State has determined that payment of these fees is deemed sufficient to offset any potential impacts from the project. Thus, the proposed project will not generate a substantial increase in elementary, middle, or high school population. Therefore, any impacts under this issue are considered less than significant.

d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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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)

Less Than Significant Impact – As stated in the preceding sections, the proposed Project is not anticipated to create a substantial increase in population through providing employment—both short- and long-term—at the proposed Main Street Plaza site. According to the City of Riverside Municipal Code, Chapter 16.60, *Local Park Development Fees*, new development within the City generates a need for added facilities and an increased demand upon existing facilities. The Local Park Development Fee for new development provides funding for new and improved facilities to meet established standards. Thus, the proposed project will be required to pay the Local Park Development Fee, payment of which is deemed sufficient to offset any potential impacts from implementing the Project. Therefore, with no potential to substantially increase the City's population, the Project's contribution to park and recreation facilities within the City would result in a less than significant impact under this issue.

e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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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)

No Impact – Other public facilities include library and general municipal services. Since the Project will not directly induce substantial population growth, it is not forecast that the use of such facilities will substantially increase as a result of the proposed project. Therefore, the Project will not result in substantial adverse physical impacts associated with the provision of new or physically altered community centers, libraries or other public facilities, will not result in the need for new or physically altered community centers, libraries or other public facilities. No impacts are anticipated. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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)*

Less Than Significant Impact – As addressed in the discussion under sections 13 and 14d above, the proposed Project does not include a use that would substantially induce population growth, and will not require a substantial short- or long-term labor force for either construction or operations of the proposed project. Thus, the proposed Project will not generate a substantial increase in residents of the City who would increase the use of existing recreational facilities. Additionally, the proposed Project will be required to pay the Local Park Development Fee, the payment of which is deemed sufficient to offset any potential impacts from implementing the Project. Therefore, any potential impacts under this issue are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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15b. Response:

No Impact – The proposed Project consists of a gas station, convenience store, and car wash on one portion of the site, and a drive-thru restaurant on the second portion of the site. The Project will not include any recreational facilities, nor will it require the construction of new recreational facilities or expansion of new recreational facilities because the proposed project is not anticipated to substantially induce any population growth. The use of the site as the Main Street Plaza is not forecast to require a substantial short- or long-term labor force. As a result, no recreational facilities—existing or new—are required to serve the Project, thus no impacts are anticipated under this issue.

16. TRANSPORTATION/TRAFFIC. Would the project result in:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 5.15-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP, Traffic*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Impact Analysis, Main Street Plaza, Prepared by LSA Associates, Inc., September 27, 2016, Provided as Appendix 4)

Less Than Significant With Mitigation Incorporated – Under the proposed Main Street Plaza plans, as indicated in the Traffic Impact Analysis prepared by LSA Associates, Inc. on September 27, 2016—provided as Appendix 4 to this document—is expected to generate 3,314 net daily new trips. This number includes a number of net subtractions of 394 trips from diverted linked trips and pass-by trips to either the gasoline station or fast-food restaurant establishments that will make up Main Street Plaza. The net A.M peak hour trips total 116, and the net P.M. peak hour trips total 101. Level of service (LOS) measures operations and relationship between capacity, traffic volumes, and delay resulting in LOS grades A through F (F being the lowest). The Traffic Impact Study analyzed the LOS of 8 intersections as shown in Table 16-1 below:

Table 16-1
CUMULATIVE (2017) CONDITIONS INTERSECTION LEVELS OF SERVICE (LOS)

Intersection	Control	Without Project				With Project				Significant Impact
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		
		Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	Delay (sec.)	LOS	
1 . Main Street/Russell Street	TWSC	14.2	B	18.6	C	17.4	C	23.5	C	No
2 . Orange Street/Russell Street	AWSC	13.6	B	37.8	E *	17.5	C	39.1	E *	Yes ¹
3 . Main Street/Driveway 1	TWSC	19.3	C	29.0	D	21.1	C	33.9	D	No
4 . Orange Street/Driveway 2	TWSC	Future Intersection		Future Intersection		12.2	B	14.8	B	No
5 . Orange Street/Driveway 3	TWSC	Future Intersection		Future Intersection		12.6	B	16.3	C	No
6 . Main Street/SR-60 EB Ramps	Signal	22.2	C	20.5	C	22.9	C	21.2	C	No
7 . Main Street/SR-60 WB On-Ramp	Signal	27.4	C	29.6	C	27.8	C	30.1	C	No
8 . Orange Street/SR-60 WB Off-Ramp	AWSC	22.3	C	36.4	E *	25.2	D	42.6	E *	Yes ¹

Notes:

TWSC = Two-Way Stop Control, AWSC = All-Way Stop Control

Delay = Average control delay in seconds (For TWSC intersections, reported delay is for worst-case movement).

LOS = Level of Service

* Exceeds LOS Standard

¹ The intersections of Orange Street/Russell Street and Orange Street/SR-60 Westbound Off-Ramp would operate at unsatisfactory LOS without and with project conditions. As such, the project contributes to the projected deficiency at these intersections. Therefore, a cumulative significant impact occurs at these locations.

Of the eight intersections, two would operate at an unacceptable LOS under With Project conditions. Orange Street/Russell Street and Orange Street/SR 60 Westbound off-ramp would operate at an LOS E in the P.M. Peak hour under With Project conditions, which is not within the City LOS standards. The City uses LOS D as its minimum level of service criteria for intersections and roadways of Collector or higher classification, which is the minimum LOS standard applicable to the two intersections listed above. Implementation of the following mitigation measures (proposed improvements) would reduce all cumulative and project level impacts to a less than significant level:

MM 16-1 *The project is anticipated to have a significant impact at the intersection of Orange Street at Russell Street. In order to mitigate this impact, the project shall restripe the north leg to provide a designated southbound right-turn lane and a shared southbound through/left-turn lane. This mitigation measure was assessed as part of the TIA and was found to improve the Level of Service at the intersection to an acceptable level. Project to provide 100% participation.*

MM 16-2 *The project is anticipated to have a significant impact at the intersection of Orange Street at the SR 60 WB Off-Ramp. The TIA provides a 7.68% fair share contribution towards the construction of a traffic signal to mitigate the project's impact.*

Traffic on Main Street and, to a lesser extent Orange Street is generally heavy because these streets serve highway on- and off-ramps. Therefore, construction activities could potentially cause conflicts to the flow of traffic so a Traffic Management

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Plan must be created and implemented to mitigate the impacts to traffic accessing the project site. All construction traffic will comply with City and County standards, and as stated in the preceding sections, construction will occur only within acceptable hours on working days. Thus, with the implementation of the above mitigation measures under the conditions of the fair-share intersection contribution, any impacts from the proposed project will be considered less than significant.

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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16b. 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 5.15-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP, and Traffic Impact Analysis, Main Street Plaza, Prepared by LSA Associates, Inc., September 27, 2016, Provided as Appendix 4)

Less Than Significant With Mitigation Incorporated – Please see the response under 16a above. Implementation of mitigation measures MM 16-1 and MM 16-2 will reduce potential impacts associated with maintaining Level of Service standards to a less than significant level. No further mitigation measures are necessary.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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16c. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP, March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999) and Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005))

No Impact – There nearest airports are Flabob Airport, which is located approximately 2.5 miles to the west of the Project site, and the Riverside Municipal Airport approximately 6 miles to the southwest of the project site. According to the City of Riverside General Plan 2025 Airport Land Use Compatibility and Influence Areas map—provided as Figure 8-4—the project site is not located within the designated planning boundary. As a result, project implementation would not result in any changes in air traffic patterns at the Riverside Municipal Airport. No impacts to aviation activity will occur as a result of project implementation.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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16d. Response: (Source: Project Site Plans, Lane Striping and Signing Plans)

Less Than Significant Impact – The proposed project will occur entirely within the project site boundaries. Construction activities will not occur within the adjacent roadways to the project site. Large trucks delivering equipment or removing small quantities of excavated dirt or debris can enter the site without major conflicts with the flow of traffic on the roadways used to access the site. Primary access to the site will be provided at entrances on either Orange Street or Main Street. Access to the site must comply with all City design standards, and have been reviewed by the City to ensure that inadequate design features or incompatible uses do not occur. Additionally, the proposed Project would be required to comply with all applicable fire code and ordinance requirements for construction and permanent access to the site. Emergency response and

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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evacuation procedures would be coordinated with the City, as well as the police and fire departments, which results in less than significant impacts; no mitigation measures are required.

e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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16e. Response: *(Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code)*

Less Than Significant Impact – Emergency vehicle access to the project site will be provided one driveway on Main Street and two driveways on Orange Street. The driveways range in size from 26 to 40 feet wide. All driveways will allow full access to emergency vehicles. Sufficient space and turning radius for fire trucks will be provided on the project site around the proposed buildings.

The proposed project will be constructed pursuant to the 2016 California Fire Code as adopted and amended by the City of Riverside. As part of the plan review process, the City will require the developer to submit a Traffic Management Plan that will provide appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Therefore, implementation of the proposed project would not result in inadequate emergency access. Impacts would be less than significant impact and no mitigation is required.

f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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16f. Response: *(Source: FPEIR, General Plan 2025 Land Use and Urban Design, Circulation and Community Mobility and Education Elements, Bicycle Master Plan, School Safety Program – Walk Safe! – Drive Safe!)*

Less Than Significant Impact – The project is located on parcels between Orange Street and Main Street in the City of Riverside, which is served by Riverside Transit Authority (RTA). The nearest RTA bus stop is located at the corner of Main Street and Garner Road north of the SR-60 or at Market Street and University Avenue south of SR-60; each are less than one-mile from the Project site. The Market/University RTA bus stop connects to several other routes, which connect to the Cities of Temecula, Lake Elsinore, Palm Desert, Oceanside, and beyond. The Main/Garner route connects to Downtown Riverside and southwest Riverside beyond the Tyler Mall. As stated in the response under 16f, 4 bike parking spaces will be provided by the Project. A bike lane connects to Main Street at Spruce Street just south of the Project site, which connects the Canyon Crest portion of Riverside to the area surrounding the Project. Additionally, standard sidewalks are accessible on Main Street, Orange Street, and Russell Street. The performance of RTA, bicycle plans and policies, and other pedestrian facilities will not be disturbed as a result of implementation of the Main Street Plaza Project. Therefore, the Project will not conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

17. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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17a. Response: (Phase I Historical/Archaeological Resources Survey: Main Plaza-Riverside Project, 2234 Main Street and 2225-2243 Orange Street, City of Riverside, Riverside County, California, CRM TECH, February 24, 2017— Provided as Appendix 3)

Less Than Significant With Mitigation Incorporated – Please refer to the discussion under issue 5, Cultural Resources, above. According to the Phase I Historical/Archaeological Resources Survey prepared by CRM TECH, no historical or tribal resources with integrity are known to exist on site. Additionally, the project site is located within an area of cultural significance for the Gabrieleño Band of Mission Indians – Kizh Nation, San Manuel Band of Mission Indians, Cahuilla Band of Indians, Pechanga, Rincon Band of Luiseno Indians, Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, Pechanga, San Gabriel Band of Mission Indians, and the Soboba Band of Luiseño Indians. The City sent letters to the aforementioned tribes pursuant to AB-52, and has, to date, received responses from the following tribes: Morongo Band of Mission Indians, San Manuel Band of Mission Indians, Soboba Band of Luiseño Indians, Agua Caliente Band of Cahuilla Indians, Rincon Band of Luiseno Indians. AB 52 consultation was closed with Pechanga on 6/19/17, Soboba on 5/1/17 and 6/13/17, San Manuel on 4/27/17, and Morongo on 4/27/17. Both the Agua Caliente Band of Cahuilla Indians and San Gabriel Band of Mission Indians Rincon Band of Luiseno Indians defer the Project to either Pechanga or Soboba. The Soboba Band of Luiseño Indians and the San Manuel Band of Mission Indians agreed on the following mitigation measures to minimize impacts to Tribal Cultural Resources:

MM 17-1 *Archaeological Monitoring: At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing grading activities in an effort to identify any unknown archaeological resources. Should any prehistoric resources be discovered on site, an appropriate radius zone shall be created around the discovery until an assessment can be made of the discovery by a Secretary of Interior Standards qualified archeological monitor.*

MM 17-2 *In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:*

- a. *Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and*
- b. *Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:*
 - i. *Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; or*
 - ii. *A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; or*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- iii. *For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and/or*
- iv. *At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project Archaeologist within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center and interested tribes.*

MM 17-3 *Should any paleontological resources be accidentally encountered during construction of these facilities, earthmoving or grading activities within 100 feet of the find shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City onsite inspector. The paleontological professional shall assess the find, determine its significance, and make recommendations for appropriate management actions within the guidelines of the California Environmental Quality Act.*

MM 17-4 *Cease Ground-Disturbing Activities and Notify County Coroner If Human Remains Are Encountered. If human remains are unearthed during implementation of the Proposed Project, the City of Riverside and the Applicant shall comply with State Health and Safety Code Section 7050.5. The City of Riverside and the Applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to provide recommendations to the landowner. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.*

The proposed project will require earth moving and excavation activities, which could unearth unknown resources of significance. Any impacts to such resources would be mitigated through the implementation of mitigation measures 5-1 and 5-2, as well as implementation of mitigation measures MM 17-1 through MM 17-4. Mitigation measure MM 5-1 will protect all discovered resources through temporary curation and storage, as well as treatment and final disposition. Therefore, with the implementation of the abovementioned mitigation, the Project would not cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

17b. Response: (Phase I Historical/Archaeological Resources Survey: Main Plaza-Riverside Project, 2234 Main Street and 2225-2243 Orange Street, City of Riverside, Riverside County, California, CRM TECH, February 24, 2017—Provided as Appendix 3)

Less Than Significant With Mitigation Incorporated – Please refer to the discussion under issue 5, Cultural Resources and the response to 17a above. The Project site has been previously engineered and therefore it is unlikely that there are any significant cultural resources with integrity on the site. However, the City sent letters to the Gabrieleño Band of Mission Indians – Kizh Nation, San Manuel Band of Mission Indians, Cahuilla Band of Indians, Pechanga, Rincon Band of Luiseno Indians, Morongo Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, San Gabriel Band of Mission Indians, and the Soboba Band of Luiseño Indians pursuant to AB-52. As previously stated, the data compiled in Appendix 3 states that no historical, cultural, or tribal resources are known to exist at the Project site. The City sent letters to the aforementioned tribes pursuant to AB-52, and has, to date, received responses from the following tribes: Morongo Band of Mission Indians, San Manuel Band of Mission Indians, Agua Caliente Band of Cahuilla Indians, Rincon Band of Luiseno Indians. AB 52 consultation was closed with Pechanga on 6/19/17, Soboba on 5/1/17 and 6/13/17, San Manuel on 4/27/17, and Morongo on 4/27/17. As stated under response 17a, the Morongo Band of Mission Indians requests that a copy of the cultural report—which has been sent to them at their request—and have also requested to be included in the initial pedestrian survey of the Project site. Both Rincon and Aqua Caliente defer to responses from either Soboba or Pechanga. The Soboba Band of Luiseño Indians and the San Manuel Band of Mission Indians agreed on mitigation measures 17-1 through 17-4 above. Furthermore, mitigation measures 5-1 and 5-2 will provide protection to any such resources if the Project's earth moving, grading, or excavation activities unearth them. Therefore, with the implementation of mitigation measure 5-1 and 5-2, and 17-1 through 17-4, the Project would not cause a substantial change in the significance of tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to the California Native American tripe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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18. UTILITIES AND SYSTEM SERVICES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

18a. Response: (Source: General Plan 2025 Figure PF-2 – Sewer Facilities Map, FPEIR Figure 5.16-5 – Sewer Service Areas, 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 5.8-1 – Watersheds, Wastewater Integrated Master Plan and Certified EIR)

Less Than Significant Impact – New development in the City is required to install wastewater infrastructure concurrent with project development. All wastewater generated by the interior plumbing system of the proposed project would be discharged into the local sewer main and conveyed for treatment through Riverside Public Works Department to Riverside Regional Water Quality Treatment Plant (RRWQTP), which meets the waste discharge requirements imposed by the Santa Ana Regional Water Quality Control Board (RWQCB). The RRWQTP currently treats approximately 33 million gallons per day (MGD) of wastewater for over 280,000 residents in its service area, and has a capacity of 40 MGD. The proposed project consists of a gas station, car wash, and convenience store on one portion of the Project site, and a drive-thru restaurant on the second portion of the site. The car wash has the potential for the greatest need for the conveyance and disposal of wastewater. However, the carwash will include a gray water recycling system, which will collect, treat, and filter gray water from previous car wash cycles for use with future car wash cycles. Through the use of this gray water recycling system, little or no gray water will be discharged into the municipal sewer system for wastewater treatment. The other components of the Project will generate only a modest amount of wastewater, through the use of the onsite bathroom facilities or kitchen facilities on either portion of the site. This wastewater will represent a miniscule percentage of the existing 7 MGD of excess capacity of the permitted wastewater treatment capacity available through RRWQTP. Therefore, the Project would have a less than significant impact on the RRWQTP's ability to operate within its established wastewater treatment requirements, which are enforced via the Facility's NPDES permit authorized by the RWQCB. Any impacts under this issue are considered less than significant. No mitigation is required.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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18b. 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-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR, RPU 101 http://www.riversideca.gov/utilities/PDF/RPU_101_Web_2015.pdf.)

Less Than Significant Impact – Please refer to the discussion under sections 9b and 17a above. As discussed above, the wastewater generated at the project site will be delivered to Riverside Regional Water Quality Treatment Plant (RRWQTP), which has adequate capacity to serve the needs of the Project. Therefore, implementation of the Project will not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities.

Water transmission to the Project will be provided by Riverside Public Utilities (RPU), which serves a portion of the City of Riverside. As discussed under issue 9—Hydrology and Water Quality—above, groundwater from the Bunker Hill Basin is the primary source of water for RPU. Though RPU also purchases water from Western Municipal Water District (WMWD), which is primarily to meet peak water demand during summer months and during emergencies. RPU operates 46 domestic wells, 18 irrigation wells, and 16 reservoirs with an approximate total volume of one million gallons. According to the 2015

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Urban Water Management Plan (UWMP) for RPU, in 2015 the actual supply of water was 75,126 AF. According to the document RPU 101, RPU provides an average 71 MGD to meet demand, and during peak events provides 110 MGD to meet demand. The project is not anticipated to demand more than 0.5 to 0.75 AFY, or between approximately 446 gallons per day (gpd) to 670 gpd in order to support the needs of the Project, as established in the Hydrology and Water Quality section of this document. However, as stated in the preceding section, approximately 80 percent of the water used for each car wash cycle will be recycled for reuse for future car wash cycles. Thus, because of the nature and intensity of the use proposed, and that the Project will operate within RPU's capacity, the estimated water demand will represent only a nominal percentage of the surplus that currently exists in the water supply. Therefore, the addition of a gas station, convenience store, and car wash on one portion of the site and a drive-thru restaurant on the second portion of the site, is not forecast to require or result in the construction of new water facilities or expansion of existing facilities in order to serve the Project. Any impacts under this issue are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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18c. Response: (Source: FPEIR Figure 5.16-2 - Drainage Facilities)

Less Than Significant Impact – Please refer to the discussion under issue 9, Hydrology and Water Quality Impacts, above. The project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities. The surface of the site consists entirely of dirt; portions of the site have been compacted, but generally the site slopes from southwest to northeast (the highest point borders Orange Street; the lowest point borders Main Street). The project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) for the prevention of runoff during construction. Erosion, siltation and other possible pollutants associated with long-term implementation of projects are addressed as part of the Water Quality Management Plan (WQMP) and grading permit process. BMP implementation would maintain soil stability and potential water quality of any storm water discharges from the project site.

During operation of the site as the Main Street Plaza, the drainage pattern of the site will be altered from that which currently exists because the site is entirely pervious at present and Impervious coverage of the site as proposed is anticipated to be about 76% (landscaped area will be 24% of the site). This will not result in the need for new storm water drainage facilities because runoff will be contained on site through several drainage BMPs. These BMPs include pervious pavers, infiltration trenches, a catch basin with filter inserts, and a bioretention basin (Preliminary Grading Plan: Figures 4-6). Thus, although the amount of onsite surface flows could potentially increase as a result of the increased quantity of impervious surfaces found on the project site, under the project conditions, the amount of onsite flows being conveyed offsite will decrease, as a larger percentage of flows will be contained to the project site and adjacent drainage features. Therefore, with the implementation of onsite drainage, the NPDES requirements, SWPPP, and subsequent BMPs, implementation of the Project will not 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. Any impacts under this issue are considered less than significant.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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18d. 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, RPU Master Plan)

Less Than Significant Impact – Please refer to the discussion under section 17b above. Water transmission to the Project will be provided by Riverside Public Utilities (RPU), which serves the portion of the City that encompasses the Project site. As

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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previously stated, RPU provides an average of 71 MGD to meet demand, and during peak events provides 110 MGD to meet demand. RPU plans to have a supply of 95,203 AFY by 2020, with a planned supply of 21,700 AFY available from WMWD if necessary. With this planned increase in supply available for domestic use, the needs of the Project—an anticipated demand of 0.5 to 0.75 AFY, or between 446 gpd to 670 gpd—are not anticipated to require RPU to construct new or expanded facilities as a result of Project implementation. Additionally, according to the UWMP RPU’s water supply from Bunker Hill Basin—which makes up 60 percent of RPU’s supply—is considered a reliable water source, and overall the projections made in the UWMP are reliable. Thus, due to the minor amount of water required to serve the Project, the water supply available from RPU’s existing entitlements is considered sufficient and no new or expanded entitlements will be required. Impacts are considered less than significant.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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18e. 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, and Wastewater Integrated Master Plan and Certified EIR)*

Less Than Significant Impact – Please refer to the discussion under issues 17a and 17b above. The Project site is in the Riverside Public Works Department’s (RPWD) service area. All wastewater generated by the interior plumbing system of the proposed project would be discharged into the local sewer main through a 16” reinforced concrete pipe which will connect to the existing 36” storm drain, and will then be conveyed for treatment through RPWD to Riverside Regional Water Quality Treatment Plant (RRWQTP). There is also an existing 18” verified clay pipe (VCP) sewer main in Main Street that has two 4” laterals available for connection to the facilities proposed as part of the Main Street Plaza Project. The RRWQCP currently treats approximately 33 million gallons per day (MGD) of wastewater for over 280,000 residents in its service area, and has a capacity of 40 MGD. According to the City of Riverside General Plan 2025 FPEIR, the estimated future (2025) wastewater generation for RPWD’s service area is 45.6 MGD. In order to accommodate the future wastewater generation, which is projected to be 5.6 MDG beyond RRWQTP’s capacity, RRWQCP is upgrading their facility to accommodate a maximum of 52.2 MGD. As previously stated, the Project is not anticipated to generate a substantial amount of wastewater. The Project will generate only a modest amount of wastewater, through the use of the onsite bathroom facilities or kitchen facilities on either portion of the site. The car wash will include a gray water recycling system, which will collect, treat, and filter gray water from previous car wash cycles for use with future car wash cycles. Thus, the car wash will not significantly contribute to wastewater generated from the Project during operation. In the short-term, the wastewater generated by the Project’s operations will represent, at maximum peak flow, 12,861.71 gallons per day (GPD). This figure is based on data provided by the City (Figure 18-1), which attributes 0.01 cubic feet per second, per acre of flows for commercial developments ($0.01 \text{ CFS} \times 1.99 \text{ acre} = 0.0199 \text{ CSF} \times 86,400 \text{ seconds per day} = 1,719.36 \text{ cubic feet per day CFD}$). One cubic foot is equal to 7.48 gallons, which equates to $1718.36 \times 7.47 = 12,861.71 \text{ GPD}$ of peak wastewater flow—the actual average flow is anticipated to be less. This represents a miniscule percentage: 0.18 percent ($12,861.71 \text{ GPD} / 7 \text{ MGD} = 0.18 \text{ percent}$) of the existing 7 MGD of excess capacity of the permitted wastewater treatment capacity available through RRWQTP. Similarly, in the long-term, with the expansion of RRWQTP’s capacity, the Projects minor contribution to RPWD’s overall wastewater generation is considered less than significant. Therefore, RPWD will be able to adequately serve the needs of the Project’s demand for wastewater treatment within their current and planned capacity. Any impacts under this issue are considered less than significant.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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18f. Response: *(Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area, <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>)*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Less Than Significant Impact – The City of Riverside is served by three landfills: Badlands Landfill, El Sobrante Landfill, and Lamb Canyon Landfill. These landfills do not exclusively serve the City of Riverside. Badlands landfill can accept 4,800 tons/day, and has a remaining capacity of 15,748,799 cubic yards (CY) as of January 2015. El Sobrante Landfill can accept 16,054 tons/day, and has a remaining capacity of 145,530,000 CY as of April 2009. Lamb Canyon Landfill can accept 5,500 tons/day and has a remaining capacity of 19,242,950 CY as of January 2015. These three landfills together can accept 26,354 tons/day. Solid waste generation rates published by CalRecycle state that commercial uses such as that which this project proposes can produce 5 pounds of solid waste per 1,000 square feet of floor space. According to the site plan, the convenience store, gas station, car wash, and drive-thru restaurant total 12,014 SF of floor space, which equates to the generation of approximately 60 pounds of refuse per day. This solid waste production is considered a minor increase (approximately 0.00014 percent) of the maximum permitted tons per day available from the three landfills that serve the City. Therefore, it is expected that the Project will be served by landfills with sufficient permitted capacity to accommodate the project's solid waste disposal needs. Any impacts under this issue are considered less than significant.

g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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18g. Response: *(Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)*

Less Than Significant Impact – All collection, transportation, and disposal of any solid waste generated by the proposed project is required to comply with all applicable federal, state, and local regulations. The City is served by several surrounding landfills: Badlands Landfill, El Sobrante Landfill, and Lamb Canyon Landfill, which have adequate capacity to serve the project (further described above under issue 17f). Additionally, any hazardous materials collected on the project site during either construction or operation of the Project will be transported and disposed of by a permitted and licensed hazardous materials service provider, as stated under issue 8, Hazards and Hazardous Materials above. Therefore, the Project is expected to comply with all regulations related to solid waste under federal, state, and local statutes. Any impacts under this issue are considered less than significant.

19. MANDATORY 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

19a. 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 Biological Resources Assessment, Main Street Plaza Project, provided as Appendix 2a; MSHCP Consistency Analysis, Main Street Plaza Project, provided as Appendix 2b, 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, and Phase I Historical/Archaeological Resources Survey: Main Plaza-Riverside Project, 2234 Main Street and 2225-2243 Orange Street, City of Riverside, Riverside County, California, CRM TECH, February 24, 2017—Provided as Appendix 3)*

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Less Than Significant With Mitigation Incorporated – The Project has no potential to cause a significant impact any biological or cultural resources. The project has been identified as having no potential to degrade the quality of the natural environment, substantially reduce 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The Project site is in an urban area with developed structures and infrastructure surrounding the property and no natural biological habitat exists within the area of potential effect (APE). Based on the historic disturbance of the site, and its current disturbed condition, the potential for impacting cultural or biological resources is low. Because migratory birds and burrowing owl could be impacted with implementation with the proposed Project, mitigation measures to prevent incidental take/protect nesting birds, and protect burrowing owl have been provided. No cultural resources could be affected because the site itself has been graded and previously disturbed so it is not anticipated that any resources could be affected by the Project because no cultural resources exist. However, because it is not known what could be unearthed upon any excavation activities, mitigation measures are provided to ensure that, in the unlikely event that any resources are found, they are protected from any potential impacts. Please see biological and cultural sections of this Initial Study.

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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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19b. Response: (Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)

Less Than Significant With Mitigation Incorporated – Based on the analysis in this Initial Study, the proposed Main Street Plaza has the potential to cause impacts that are individually or cumulatively considerable. There are no other projects in the project vicinity to which this project would make a cumulatively considerable impact (see Appendix 4—Traffic Study for a list of Projects proposed for development in the area). The issues of Aesthetics, Air Quality, Biology, Cultural, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation and Traffic, Tribal Cultural Resources, and Utilities and Service Systems require the implementation of mitigation measures to reduce impacts to a less than significant level and ensure that cumulative effects are not cumulatively considerable. All other environmental issues were found to have no significant impacts without implementation of mitigation. The potential cumulative environmental effects of implementing the proposed project have been determined to be less than considerable and thus, less than significant impacts.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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19c. Response: (Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)

Less Than Significant With Mitigation Incorporated – The proposed project includes activities that have a potential to cause direct substantial adverse effects on humans. The issues of Aesthetics, Air Quality, Geology and Soils, Hazards and Hazardous Materials, and Noise require the implementation of mitigation measures to reduce human impacts to a less than significant level. All other environmental issues were found to have no significant impacts on humans without implementation of mitigation. The potential for direct human effects from implementing the proposed project have been determined to be less than significant.

Conclusion

This document evaluated all CEQA issues contained in the latest Initial Study Checklist form. The evaluation determined that either no impact or less than significant impacts would be associated with the issues of Agricultural And Forestry

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Resources, Greenhouse Gas Emissions, Land Use And Planning, Mineral Resources, Population/Housing, Public Services, and Recreation. The issues of Aesthetics, Air Quality, Biology, Cultural, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Transportation and Traffic, and Utilities and Service Systems require the implementation of mitigation measures to reduce impacts to a less than significant level. The required mitigation has been proposed in this Initial Study to reduce impacts for these issues to a less than significant impact.

Based on the findings in this Initial Study, the City of Riverside proposes to adopt a Mitigated Negative Declaration (MND) for the Main Street Plaza Project.

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 ²	Monitoring / Reporting Method
AIR QUALITY	MM 3-1: Fugitive Dust Control <ul style="list-style-type: none"> • Apply soil stabilizers or moisten inactive areas. • Address previously disturbed areas if subsequent construction is delayed. • Water exposed surfaces as needed to avoid visible dust leaving the construction site (typically 2-3 times/day). • Cover all stock piles with tarps at the end of each day or as needed. • Provide water spray during loading and unloading of earthen materials. • Minimize in-out traffic from construction zone. • Cover all trucks hauling dirt, sand, or loose material and require all trucks to maintain at least two feet of freeboard. • Sweep streets daily if visible soil material is carried out from the construction site. 	Prior to start of Grading and Construction activities.	Public Works Department Building & Safety Division	Periodic Inspection by City
	MM 3-2: Exhaust Emissions Control <ul style="list-style-type: none"> • Utilize well-tuned off-road construction equipment. • Establish a preference for contractors using Tier 3 or better heavy equipment. • Require the dozer be equipped with a dpf filter for the estimated 8 days of grading. • Enforce 5-minute idling limits for both on-road trucks and off-road equipment. 	Prior to start of Grading and Construction activities.	Public Works Department Building & Safety Division	Periodic Inspection by City
BIOLOGICAL RESOURCES	MM 4-1: The State of California prohibits the “take” of active bird nests. To avoid an illegal take of active bird nests, any grubbing, brushing or tree removal should be conducted outside of the the State identified nesting season (nesting	Prior to any ground disturbance between February 15 and September 15	Planning Division	Report provided to the Planning Division

² All agencies are City of Riverside Departments/Divisions unless otherwise noted.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ²	Monitoring / Reporting Method
	season is February 15 through September 15). Alternatively, the site shall be evaluated by a qualified biologist prior to the initiation of ground disturbance to determine the presence or absence of nesting birds. Active bird nests MUST be avoided during the nesting season. If an active nest is located in the project construction area it will be flagged and a 300-foot avoidance buffer placed around it. No activity shall occur within the 300-foot buffer until the young have fledged the nest.			
	MM 4-2: Pre-construction presence/absence surveys for burrowing owl within the survey area where suitable habitat is present will be conducted for all Covered Activities through the life the permit. Surveys will be conducted within 30 days prior to disturbance. Take of active nests will be avoided. Passive relocation (use of one way doors and collapse of burrows) will occur when owls are present outside the nesting season.	Within 30 days prior to any ground disturbance	Planning Division	Report provided to the Planning Division

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ²	Monitoring / Reporting Method
CULTURAL RESOURCES	<p>MM 5-1: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> 1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and 2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: <ol style="list-style-type: none"> a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. A curation agreement with an appropriate qualified repository within 	During ground disturbance or construction activities	Planning Division and Historic Preservation Division	Compliance with Project Conditions of Approval

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ²	Monitoring / Reporting Method
	<p>Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;</p> <p>c. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default.</p>			
	<p>MM 5-2: Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities within 100 feet of the find shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City onsite inspector. The paleontological professional shall assess the find, determine its significance, and make recommendations for appropriate management actions within the guidelines of the California Environmental Quality Act.</p>	During ground disturbance or construction activities	Planning Division and Historic Preservation Division	Compliance with Project Conditions of Approval
TRAFFIC	<p>MM 16-1: The project is anticipated to have a significant impact at the intersection of Orange Street at Russel Street. In order to mitigate this impact, the project shall restripe the north leg to provide a designated southbound right-turn lane and a shared southbound through/left-turn lane.</p>	Prior to final inspection	Public Works Department	Compliance with Project Conditions of Approval

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ²	Monitoring / Reporting Method
	This mitigation measure was assessed as part of the TIA and was found to improve the Level of Service at the intersection to an acceptable level. Project to provide 100% participation.			
	MM 16-2: The project is anticipated to have a significant impact at the intersection of Orange Street at the SR 60 WB Off-Ramp. The TIA provides a 7.68% fair share contribution towards the construction of a traffic signal to mitigate the project's impact.	Prior to final inspection	Public Works Department	Compliance with Project Conditions of Approval
TRIBAL CULTURAL RESOURCES	MM 17-1: Archaeological Monitoring: At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing grading activities in an effort to identify any unknown archaeological resources. Should any prehistoric resources be discovered on site, an appropriate radius zone shall be created around the discovery until an assessment can be made of the discovery by a Secretary of Interior Standards qualified archeological monitor.	Minimum 30-days prior to application for a grading permit	Planning Division, Historic Preservation Division Qualified Archeological Monitor	Evidence that a qualified archeological monitor has been retained shall be provided to the City.
	MM 17-2: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries: a. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and	Grading and construction activities	Planning Division, Historic Preservation Division Qualified Archeological Monitor	Report prepared that documents the finding and disposition of any Native American cultural resources If resources are found and curated, a copy of the curation agreement shall be provided to the City Submission of Phase IV Monitoring Report

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ²	Monitoring / Reporting Method
	<p>b. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:</p> <ul style="list-style-type: none"> i. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; or ii. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; or iii. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they 			

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ²	Monitoring / Reporting Method
	<p>shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and/or</p> <p>iv. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project Archaeologist within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center and interested tribes.</p>			
TRIBAL CULTURAL RESOURCES	<p>MM 17-3: Should any paleontological resources be accidentally encountered during construction of these facilities, earthmoving or grading activities within 100 feet of the find shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City onsite inspector. The paleontological professional shall assess the find, determine its significance, and make recommendations for appropriate management actions within the guidelines of the California Environmental Quality Act.</p>	Grading and construction activities	Planning Division, Historic Preservation Division, Building & Safety Division Qualified Paleontologist	Onsite inspection by a qualified Paleontologist

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ²	Monitoring / Reporting Method
	<p>MM 17-4: Cease Ground-Disturbing Activities and Notify County Coroner If Human Remains Are Encountered. If human remains are unearthed during implementation of the Proposed Project, the City of Riverside and the Applicant shall comply with State Health and Safety Code Section 7050.5. The City of Riverside and the Applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to provide recommendations to the landowner. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.</p>	Grading and construction activities	Planning Division, Historic Preservation Division, Building & Safety Division Applicant	Notify the County Coroner

VARIANCE REQUESTED-

We request approval for Variance to the Riverside Municipal Code Section 19.450.030 Site Location, Operation, and Development Standards. A. Off-sale of Alcoholic Beverages 3. "The business shall be located a minimum distance of 1000 feet From businesses licensed by the state of California for Off-sale general alcoholic beverages with less than 15,000 square feet of gross floor area or which sells alcoholic beverages as its principal business as measured from any point upon the outside walls of the building or buildings lease space of the business applying for the discretionary permit to the nearest property line of the site site containing the existing off-site alcoholic beverage sales business". **Our proposal is within 100 feet of an existing off-sale alcoholic sales business.**

1. **Yes.** There are special circumstances applicable to the Property, including size, shape, location or surroundings, where the strict application of the Municipal Code would deprive our Property of privileges enjoyed by other property in the vicinity and identical zone. Formerly, our Property was occupied by an old Shell Station fronting Main Street with 4 MPDs that sold Beer and Wine, a Liquor Store to its east and a Deli closer to Orange Street. The Station had been there since 1963. During this period, Connector Street was the route commuters used from both Main and Orange Streets to go EB on SR 60, since the EB on ramp was located at Orange Street. At that time, Connector Street bordered the Property on the north while SR 60 was adjacent to Connector to its north. Later, a new EB on ramp to SR 60 was constructed at Main Street when Caltrans bought property in addition to ours and the City vacated Connector Street. Hence, Main Street really became the northern Gateway to Downtown Riverside. Therefore, the strict application of the provisions of the Zoning Code would deprive our Property from being developed to its highest potential **SPECIFICALLY DUE TO ITS LOCATION**, operation, building design (Mission elements), site layout, **traffic characteristics and environmental impacts**.
2. **Yes.** The granting of the Variance is necessary for the preservation and enjoyment of
a substantial property right possessed by others in the same vicinity and zone, denied our property for which we are requesting the Variance. Our economy is dependent on the exchange of goods and services in a free and open market. Therefore, unrestricted competition is the driving force behind a healthy economy. Restrictions to Trade and Commerce might create unintended consequences that could undermine certain inherent Property Rights. Our Property is ideally located and very desirable for the uses we are proposing to the Community, i.e., located: at on on and off ramp to major Interstate, at the northern Gateway to Downtown Riverside, and at a going home site.
3. **No.** The granting of the Variance will not be detrimental to the public health, safety, or welfare, or injurious to the property or improvements in the neighborhood and zone where the property is located. The location of our Project guarantees the provision of necessary services to the community, the commuter and those entering/exiting the City

at the northern Gateway to Downtown Riverside which are envisioned in the Zoning Code.

4. **No.** The granting of the Variance does not constitute a special privilege inconsistent with the objectives of any part of the General Plan. Therefore, we are convinced that the redevelopment of our Property with a new state of the art service station, advanced car wash systems and a larger Convenience Store (3,645sq. ft.), complies with the intent of the North Main Street Specialty Services District of the Downtown Specific Plan, since our project is compatible with the other existing and proposed uses in the area. In summary, the Highest and Best Use for our Property is what we have proposed based on its **strategic location**.



COMMUNITY DEVELOPMENT DEPARTMENT PLANNING DIVISION

VARIANCE JUSTIFICATION FORM

PLEASE TYPE OR PRINT CLEARLY

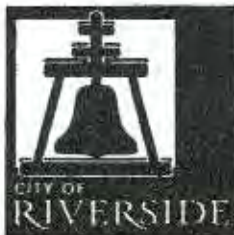
Project Description: AMPM Service Station, C-store, Car wash and fast food restaurant with drive thru aisle
Project Location: 2234 North Main Street
Assessor's Parcel Number (APN): 209592-005, 006, 013, 016 & 028

VARIANCES REQUESTED – State variance(s) requested specifically and in detail. Please attach separate sheets(s) as necessary.

Request a minor reduction of 1.30 feet in the landscape setback on Grange Street frontage from 15 feet to 13.70 feet.

REQUIRED FINDINGS – Answer each of the following questions yes or no and then explain your answer in detail. Questions 1 and 2 must be answered “yes” and 3 and 4 “no” to justify granting of a variance. Attach written details if insufficient space is provided on this form. Economic hardship is not an allowable justification for a variance.

1. Will the strict application of the provisions of the Zoning Code result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the Zoning Code? Explain in detail. Yes. The site has been designed to accommodate the planned uses in the most efficient way possible without jeopardizing the project's viability. The final site design can't be shrunk further without compromising other development sds. This variance is the least harmful.
2. Are there special circumstances or conditions applicable to your property or to the intended use or development of your property that do not apply generally to other property in the vicinity and under the identical zoning classification? Explain in detail. Yes. Site is located adjacent to EB on-ramp to 60/215 & is burdened by Caltrans easement over a portion
3. Will the granting of such variance prove materially detrimental to the public welfare or injurious to the property or improvements in the zone or neighborhood in which your property is located? Explain in detail. No. Property fronts Main Street on Westside, EB on-ramp on northside, Circle K-76 with car wash on southside and Caltrans Park/Ride on eastside.
4. Will the granting of such variance be contrary to the objectives of any part of the General Plan? Explain in detail. No. The planned site development would not be contrary to the objectives of the North Main Street Specialty Services District.



COMMUNITY DEVELOPMENT DEPARTMENT PLANNING DIVISION

GRADING EXCEPTIONS JUSTIFICATION FORM

Conditional exceptions to the regulations contained in Title 17 of the Riverside Municipal Code (Grading) shall be permitted, subject to Chapter 17.32, upon a determination by the Zoning Administrator that exceptional or special circumstances apply to the property. Such exceptional or special circumstances shall include such characteristics as unusual lot size, shape, or topography, drainage problems, or the impracticability of employing a conforming grading plan, by reason or prior existing recorded subdivisions or other characteristics of contiguous properties.

An application for the waiver of any requirement of Title 17 of the Riverside Municipal Code (Grading) shall be filed with the Planning Division prior to the approval of a grading plan. The application shall contain information which demonstrates that there are exceptional or special circumstances that apply to the property that would prevent full compliance with this title. The application shall demonstrate the existence of exceptional or special circumstances by making the findings listed on the second page of this form.

PLEASE NOTE: If at any time the Zoning Administrator believes that sufficient controversy or public interest may exist regarding an application, the application may be referred to the City Planning Commission for consideration. The City Planning Commission may set the action for review at a public hearing if they so determine that it would be appropriate.

PLEASE TYPE OR PRINT CLEARLY

LEGAL OWNER/APPLICANT/REPRESENTATIVE

Printed Name: ACAA, LP / Alex Mucino
Address: 422 Wier Road, Front Office
City: San Bernardino State: CA Zip: 92408
Daytime Telephone: (951) 712-0049 Facsimile: ()
E-Mail Address: alexmmu@gmail.com

PROJECT/PROPERTY INFORMATION

Assessor's Parcel Number(s): 209-092-005, 006, 012, 016 &
Address: 2234 North Main Street 028
Project Description/Location: AM PM Service Station, C-Store, Drive thru car wash and fast food with drive aisle
Size of Subject Property (Square Feet/Acres): 2.0 acres

GRADING EXCEPTIONS JUSTIFICATION FORM

EXCEPTIONS REQUESTED

Describe the exceptions requested in detail; attach a separate sheet if necessary.

Request a Grading exception for retaining walls that will exceed 6' in height.

REQUIRED FINDINGS

Answer each of the following questions "yes" or "no" and then explain your answer in detail. Questions 1 and 2 must be answered "yes" and question 3 "no" to justify granting an exception. Attach written details if insufficient space is provided on this form. Economic hardship is not an allowable justification for an exception from Title 17 of the Riverside Municipal Code (Grading).

1. Will the strict application of the provisions of this title result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of Title 17 of the Riverside Municipal Code (Grading)? Explain in detail. Yes.

The sharp rise in topography (site) increases from west to east (20 ft) and as a result the creates difficulties and hardships in balancing site layout, circulation, parking setbacks etc. reqmts.

2. Are there exceptional circumstances or conditions applicable to the property involved or the intended use or development of the property that do not apply generally to other properties in the same zone or neighborhood? Explain in detail. Yes.

Project sits between an existing improved property (south) and the EB on-ramp to SR 60. The location is highly sought for the proposed uses, since these type of properties are few, therefore highly desirable

3. Will the granting of a waiver be materially detrimental to the public welfare or injurious to the property or improvements in the some of neighborhood in which the property is located? Explain in detail. No

The development of the property will provide essential services to the immediate area, travellers, & visitors to the city.

3900 Main Street – Third Floor, Riverside, CA 92522

Phone: (951) 826-5371 / Fax: (951) 826-5981

www.riversideca.gov/planning



1 – Looking west across the subject site, towards Main Street.



2 – Looking east across the subject site, towards Orange Street.



3 – Looking west across the subject site, towards Main Street.



4 – Looking northwest across the subject site, towards SR-60.



5 – Looking northeast across the subject site, towards SR-60.