Draft Initial Study/Mitigated Negative Declaration

Lincoln-Van Buren Commercial Development
City of Riverside, California

Lead Agency | Community and Economic Development Department
City of Riverside
3900 Main Street, 3rd Floor
Riverside, California 92522

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September 2019

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CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT **PLANNING DIVISION**

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

AGENDA ITEM NO. ---

WARD: 5

1. **Case Numbers:** **P17-0494 (General Plan Amendment), P17-0495 (Rezone), P18-0987 (CUP), P18-0988 (PM), P18-0989 (VR), P18-0990 (DR), and P18-0991 (PCRN)**

2. **Project Title:** **Lincoln Van Buren Commercial Development**

3. **Hearing Date:** **October 3, 2019**

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

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

6. **Project Location:** The approximately 1.507-acre project site is located at the southwest corner of Van Buren Boulevard and Lincoln Avenue. The site is located in Section 18, Township 3 South, Range 5 West of the San Bernardino Meridian. Exhibit 1 shows the regional location and local vicinity of the project site, and Exhibit 2 provides an aerial photograph of the project site and surrounding areas.

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

   Lincoln-Van Buren Properties, LLC
   3731 Tibbetts Street
   Riverside, California 92506

   Contact: Steve Berzansky
   Steven Walker Communities
   7111 Indiana Avenue, Suite 300
   Riverside, California 92504

8. **General Plan Designation:** The project site is designated as VHDR – Very High Density Residential in the Land Use Policy Map in the City of Riverside General Plan.

9. **Zoning:** The project site is zoned R-4 – Multiple-Family Residential in the City's Zoning Map.

10. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

PROPOSED DEVELOPMENT

The project involves subdividing the 1.507-acre lot into two parcels and the development of commercial uses (refer to the Tentative Parcel Map provided on Exhibit 10). A gas station and convenience store (e.g., 7-Eleven) would be constructed on a 0.749-acre lot at the corner of Lincoln Avenue and Van Buren Boulevard and a multi-tenant commercial building consisting of a drive through restaurant and retail uses would be constructed on a 0.758-acre lot immediately to the northwest of the proposed gas station. A description of the proposed uses and other project features is provided below.

Commercial Uses

The site plan for the proposed project is provided on Exhibit 3. As part of the gas station, a 3,062square-foot, one-story rectangular building is proposed adjacent to and facing away from Lincoln Avenue. This building would be utilized as a convenience store. Parking spaces would be provided along the front facade of the store, with a bike rack to the northwest and a propane tank and trash enclosure to the southwest. Central to the site would be a canopy with 6 pumps, providing 12 gasoline pumping stations. Two underground fuel storage tanks would be located west of the pumps, and additional parking spaces would be provided northeast of the pumps. The underground fuel storage tanks would be installed in compliance with applicable regulations for the provision of vapor control, corrosion protection, overfill prevention, spill prevention, and release detection features and systems. The multi-tenant commercial building would include a 1,960 square foot drive through restaurant and two retail uses of 1,645 square feet each constructed at the northern section of the 0.758-acre restaurant lot, along Van Buren Boulevard. The restaurant would have a surface parking area on the southwestern section of the lot, with a drive-through aisle running around the building on three sides.

The building architecture would be typical of similar uses in the City. The proposed buildings would be one-story, wood-framed structures with stucco or painted exterior walls. Color, texture, and plane variations would be provided by stone veneers; canopies over glass windows; articulated entries and drive-through window (restaurant); and a hip, mansard, or parapet roof. The gas pump canopy would have columns supporting a flat roof. Business signage would also be provided on site as wall signs, monument signs, and/or pole signs.

Circulation and Parking

On Site

As shown on Exhibit 3, vehicular access to the project site would be provided by two-way driveways: one on Van Buren Boulevard and the other on Lincoln Avenue. For the gas station parcel, a full access driveway would be provided at the southern end of the site, off Lincoln Avenue. Another driveway would be provided at the center of the site frontage on Van Buren Boulevard; this driveway would be restricted to right-turn-in and right-turn-out movements. These driveways would be connected by drive aisles that would circle around the gas pump islands. Access to the restaurant/retail parcel would be available from the drive aisle of the gas station parcel at two locations, with drive aisles extending into the parking lot of the restaurant/retail parcel. Lincoln Avenue and Van Buren Boulevard cross sections are depicted on Exhibit 4.

The City's parking standards require 1 space per 100 square feet of restaurant uses and 1 space per 250 feet of retail space for a vehicle fuel station with an accessory retail/convenience market. A total of 47 parking spaces are required for the proposed project. Thirteen spaces would be provided for the gas station and 38 spaces for the restaurant/retail uses, for a total of 51 parking spaces provided on site, including designated handicap-accessible spaces for Americans with Disabilities Act (ADA) compliance. The 51 parking spaces exceeds the City's parking standard requirement of 46 parking spaces for the proposed project. In compliance with CalGreen Code, the proposed project would designate two common parking spaces to be pre-wired for electric vehicle charging stations. Also, bicycle racks would be provided adjacent to the convenience store.

Open Space, Landscaping, Walls/Fences, and Exterior Lighting

Landscaping would be provided at setback areas along the site frontage on Van Buren Boulevard and Lincoln Avenue, around the proposed buildings, and along the northwestern site boundary. No specific planting palette has been developed for the project, but trees, shrubs and groundcover are expected to consist of California native plant materials and/or water-efficient landscaping consistent with the City's Water Efficient Landscaping and Irrigation regulations. Block walls no more than 6 feet high would be constructed by others along the site's northwestern and southwestern boundaries adjacent to the parcel that is not a part of the project.

Exterior lighting would be provided for safety, security, and wayfinding and consist of light poles for parking lots, exterior building lights, canopy lights at the gas pumps, walkway lights, drive-through lane lighting, lighted restaurant menu and gas price boards, and lighted business signs.

Utility Infrastructure

Municipal and private utility services necessary to serve the proposed project are currently available adjacent to the project site. On-site utility infrastructure necessary to serve the proposed project—including water, sanitary sewer, drainage, water quality treatment, and dry utilities (e.g., electricity, natural gas, telecommunication, and cable television)—would be installed with the proposed project and would connect to existing utility lines, with the final sizing and design of on-site facilities made during final design. Off-site impacts, which would result from needed utility infrastructure connections are analyzed in this Initial Study. Existing and proposed water and sewer infrastructure is described below and shown on Exhibit 5.

- **Water.** Water service to the project would be provided by connections to the existing 8-inch water line on Van Buren Boulevard along the site frontage, which is owned and maintained by the Riverside Public Utilities (RPU). On-site water lines would extend from each building and connect to the existing water line in Van Buren Boulevard to provide domestic water service to the proposed project. Separate water line connections would also extend from the water line in Van Buren Boulevard to the proposed buildings to provide fire service to the project. One existing fire hydrant is located along the site boundary on Van Buren Boulevard, with two other hydrants farther to the north. No known upgrades to existing water lines or the City's water system facilities have been identified at this time.
- **Sewer.** Sewer service to the project would be provided by connections to the City's Public Works Department 8-inch sewer line in Van Buren Boulevard. On-site sewer lines would be installed in the proposed buildings and would extend from each building into oil/grease interceptors before connecting to the existing sewer line in Van Buren Boulevard. No known upgrades to existing sewer lines have been identified at this time.
- **Storm Drainage and Water Quality Features.** The City owns and maintains public storm drains serving the project area. A 73-inch line in Van Buren Boulevard runs northwesterly from approximately 1,000 feet north of the site and then turns west as a 96-inch storm drain line on Rudicill Street that ties to the storm drain line in Myers Street which, in turn, connects to the Arlington Channel and Reach 1 of Temescal Creek. The project would provide two on-site storm water treatment chambers, which would remove pollutants and then direct storm water into infiltration chambers to allow storm water to percolate into the ground (see Exhibit 6). Overflows from the underground chambers would be directed toward the curb and gutter on Van Buren Boulevard that would convey runoff northwesterly to the existing catch basin near the intersection of Van Buren Boulevard and Rudicill Street.
- **Dry Utilities.** The RPU provides electrical power services to the site, and existing power lines are located along Van Buren Boulevard and Lincoln Avenue. The Southern California Gas Company has a 2-inch gas line in Van Buren Boulevard and a 3-inch gas line in Lincoln Avenue. Extensions and connections to the existing power and natural gas lines in Van Buren Boulevard would be made to serve the proposed project.

Construction Activities

Construction of the proposed project is expected to begin in Spring 2020, with demolition and site clearing activities occurring the first two weeks. Boxed plants, the trailer/retail sales office, and storage sheds would be demolished or moved to another location; and asphalt paving, building material wastes, dirt, and organic wastes would be transported for off-site disposal or diversion. It is estimated that 40 truckloads of waste materials would be exported off site.

This would be followed by site preparation, grading, and trenching activities for the next two weeks. It is estimated that 156 truckloads would be necessary for grading activities during this two-week period. The construction haul route for these trucks would primarily be Van Buren Boulevard and State Route (SR-) 91.

Building construction would take approximately seven months, followed by two weeks of exterior paving, painting of interior surfaces, and landscaping. The buildings would be typical wood-framed or concrete block structures, with the retail buildings supported on shallow concrete foundation with slab-on-grade, while the gas station canopy would be supported by drilled, cast-in-place concrete caissons or by shallow foundation. Anticipated construction equipment would include typical construction equipment, such as dozers, tractors, excavators, graders, a crane, loaders, backhoes, forklifts, welder, air compressor, generator, concrete saw, and other small equipment. No rock crushing is proposed, but pile driving could be required for the installation of the underground storage tanks.

The construction impact limits for the proposed project are shown on Exhibit 7. As shown, the entire project site would be disturbed, and off-site impacts would be associated with roadway improvements along Van Buren Boulevard and Lincoln Avenue and utility line connections in Van Buren Boulevard. Construction staging and construction worker parking would occur on the site. Construction activities are expected to be completed by Spring 2020.

Legislative and Discretionary Approvals

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

- **Adoption of the Mitigated Negative Declaration.** Adoption of the Mitigated Negative Declaration (MND) in accordance with the California Environmental Quality Act (CEQA), prior to approval of the proposed project.
- **General Plan Amendment (P17-0494 [GPA])**. The proposed project requires the amendment of the land use designation of the project site in the Land Use Policy Map of the General Plan, from VHDR – Very High Density Residential to C – Commercial (see Exhibit 8).
- **Rezone (P17-0495 [RZ]).** The proposed project requires a change in the zoning of the project site on the City's Zoning Map from R-4 – Multiple-Family Residential Zone to CR – Commercial Retail Zone (see Exhibit 9).
- **Tentative Parcel Map 37711 (P18-0988 [TPM]).** A Parcel Map to divide the existing one lot into two lots.
- **Conditional Use Permits (P18-0986 and P18-0987).** The proposed gas station would require a Conditional Use Permit (CUP), and the drive through restaurant would require a separate CUP. A Modification is also requested to modify one-acre gross land area requirement for a gas station under the Conditional Use Permit.
- **Variance (P18-0989).** A Variance to allow alcohol sale within 100 feet of any residential dwelling or property zoned for residential uses.

- **Design Review (P18-0990).** Design Review to ensure project plan's compliance with the City's applicable standards, guidelines, and pertinent regulatory requirements.

- **Public Convenience and Necessity Determination (P18-0991).** A Public Convenience or Necessity for the issuance of a Type 20 license for the proposed 7-Eleven convenience store and gas station.

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

The project site is located in an urbanized area of the City and is utilized as a plant nursery (Moon Valley Nurseries). The site itself is occupied by a single-story trailer/retail sales office, several storage sheds, and an asphalt-paved surface parking lot. Adjacent to the project site are Van Buren Boulevard and Lincoln Plaza shopping center to the east; Lincoln Avenue and single-family residences to the south; the remaining portion of the plant nursery to the north; and the remaining portion of the plant nursery to the west with single-family residences farther west. On-site and adjacent developments, land use designations, and zoning are provided below.

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Plant Nursery (Moon Valley Nurseries)	VHDR - Very High Density Residential	R-4 - Multiple-Family Residential Zone
North	Plant Nursery (Moon Valley Nurseries)	VHDR - Very High Density Residential	R-4 - Multiple-Family Residential Zone
South	Single-Family Residences	MDR – Medium Density Residential	R-1-7000 – Single Family Residential Zone
East	Commercial Shopping Center (Lincoln Plaza)	C – Commercial	CR-S-1-X – Commercial Retail, Building Stories (maximum one) and Building Setback (25 feet from perimeter) Overlay Zones
West	Plant Nursery (Moon Valley Nurseries) and Single-Family Residences	VHDR - Very High Density Residential and MDR – Medium Density Residential	R-4 - Multiple-Family Residential Zone and R-1-7000 – Single Family Residential Zone

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

a. Santa Ana Regional Water Quality Control Board – Coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit
b. South Coast Air Quality Management District – Permits to operate equipment at the fast food restaurant and gas station

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

a. Riverside General Plan 2025
b. Riverside General Plan 2025 Final Program Environmental Impact Report (FPEIR) (State Clearinghouse No. 2004021108)
c. City of Riverside 2014-2021 Housing Element
d. Riverside Municipal Code

13. **California Native American tribes traditionally and currently affiliated with the project area requesting consultation pursuant to Public Resources Code Section 21080.3.1:**

    a. Soboba Band of Luiseño Indians
    b. San Manuel Band of Mission Indians
    c. Agua Caliente Band of Cahuilla Indians

14. **List of Appendices**

    a. Air Quality Analysis
    b. Burrowing Owl Habitat Assessment
    c. Cultural Resource Literature Review
    d. Preliminary Soil Investigation Report
    e. Greenhouse Gas Emissions Analysis
    f. Phase 1 and Phase II Environmental Site Assessment
    g. Preliminary Water Quality Management Plan
    h. Noise and Vibration Analysis
    i. Traffic Impact Analysis

15. **Acronyms**

AB -	Assembly Bill
ACM -	asbestos-containing materials
ADA -	Americans with Disabilities Act
ADT -	average daily traffic
AQMP -	Air Quality Management Plan
APN -	Assessor's Parcel Number
ARB -	Air Resources Board
BCE -	Before Common Era
bgs -	below ground surface
BMP -	Best Management Practices
C&D -	construction and demolition
CAAQS -	California Ambient Air Quality Standards
CalARP -	California Accidental Release Prevention
CalEEMod -	California Emissions Estimator Model
CalEPA -	California Environmental Protection Agency
CalFire -	California Department of Forestry and Fire Prevention
CalGreen Code -	California Green Building Standards Code
CalOSHA -	State Occupational Safety and Health Administration
Caltrans -	California Department of Transportation
CAP -	Climate Action Plan
CAPCOA -	California Air Pollution Control Officers Association
CDFW -	California Department of Fish and Wildlife
CE -	Common Era
CEQA -	California Environmental Quality Act
CERCLIS -	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR -	Code of Federal Regulations
cfs -	cubic feet per second
CH_4 -	methane
CMP -	Congestion Management Program
CNDDB -	California Natural Diversity Database
CNEL -	Community Noise Equivalent Level

CNPS - California Native Plant Society
CO - carbon monoxide
CO_2 - carbon dioxide
CO_2e - carbon dioxide equivalent
CPTED - Crime Prevention Through Environmental Design
dB - decibel
dBA - A-weighted decibel
DOF - Department of Finance
DOGGR - Division of Oil, Gas, and Geothermal Resources
DPM - diesel particulate matter
DTSC - Department of Toxic Substances Control
DWQ - Division of Water Quality
DWR - Department of Water Resources
EIC - Eastern Information Center
EIR - Environmental Impact Report
EO - Executive Order
EOP - Emergency Operations Plan
EPAP - Economic Prosperity Action Plan
ESA - Environmental Site Assessment
FAR - floor area ratio
FEMA - Federal Emergency Management Agency
FMMP - Farmland Mapping and Monitoring Program
FPEIR - GP 2025 Final Programmatic Environmental Impact Report
FTIP - Federal Transportation Improvement Program
GHG - Greenhouse Gas
GP 2025 - General Plan 2025
GPA - General Plan Amendment
gpd - gallons per day
GWP - global warming potential
HCOC hydrologic conditions of concern
HCP - Habitat Conservation Plan
HFC - hydrofluorocarbons
HRA - Health Risk Assessment
HVAC heating, ventilation, and air conditioning
I- - Interstate
in/sec inches per second
IS - Initial Study
LACM - Los Angeles County Museum of Natural History
Leq - sound level in decibels equivalent to the total sound energy measured over a stated period of time
LHMP - Local Hazard Mitigation Plan
LLC - Limited Liability Corporation
Lmax - maximum sound level during a measurement period or a noise event
LOS - level of service
LST - localized significance thresholds
LUST - Leaking Underground Storage Tank
MATES-IV - Multiple Air Toxics Exposure Study in the South Coast Air Basin
MBTA - Migratory Bird Treaty Act
MDR - Medium Density Residential
MEI - maximally exposed individual
mg/Kg - milligrams per kilogram
MLD - most likely descendant
MM - mitigation measure

MND - Mitigated Negative Declaration
MPO - Metropolitan Planning Organization
MRF - Materials Recycling Facility
MRZ - Mineral Resource Zone
MS4 - Municipal Separate Storm Sewer System
MSHCP - Multiple Species Habitat Conservation Plan
msl - mean sea level
$MTCO_2e$ - metric tons of CO_2e
N_2O - nitrous oxide
NAAQS - National Ambient Air Quality Standards
NAHC - Native American Heritage Commission
NCCP - Natural Communities Conservation Plan
NO_2 - nitrogen dioxide
NPDES - National Pollutant Discharge Elimination System
NRHP - National Register of Historic Places
O_3 - ozone
OES - Office of Emergency Services
OPR - Office of Planning & Research, State
OSHA Occupational Safety and Health Administrations
PCE - perchloroethylene
PFC - perfluorocarbon
PEIR - Program Environmental Impact Report
PHMSA - Pipeline and Hazardous Material Safety Administration
PM2.5 - fine particulate matter with a diameter of 2.5 microns or less
PM10 - respirable particulate matter with a diameter of 10 microns or less
ppb - parts per billion
ppv - peak particle velocity
PW - Public Works, Riverside
RCA - Regional Conservation Authority
RCALUC - Riverside County Airport Land Use Commission
RCALUCP - Riverside County Airport Land Use Compatibility Plan
RCP - Regional Comprehensive Plan
RCFC&WCD - Riverside County Flood Control and Water Conservation District
RCTC - Riverside County Transportation Commission
RHNA - Regional Housing Needs Assessment
RMC - Riverside Municipal Code
RMP - Risk Management Program
RPD - Riverside Police Department
RPU - Riverside Public Utilities
RRG Riverside Restorative Growthprint
RTA - Riverside Transit Agency
RTP - Regional Transportation Plan
RUSD - Riverside Unified School District
RWQCB - Regional Water Quality Control Board
RWQCP - Regional Water Quality Control Plant
SB - Senate Bill
SCAG - Southern California Association of Governments
SCAQMD - South Coast Air Quality Management District
SCG - Southern California Gas Company
SCH - State Clearinghouse
SCS - Sustainable Communities Strategy
SF_6 - sulfur hexafluoride

SKR -	Stephens' kangaroo rat
SKR-HCP -	Stephens' Kangaroo Rat - Habitat Conservation Plan
SO_2 -	sulfur dioxide
SoCAB -	South Coast Air Basin
SR -	State Route
SWPPP -	Storm Water Pollution Prevention Plan
TAC -	toxic air contaminant
TDM -	Transportation Demand Management
TMDL -	Total Maximum Daily Load
TPH -	Total Petroleum Hydrocarbon
TRI -	Toxics Release Inventory
TUMF -	Transportation Uniform Mitigation Fee
USACE -	U.S. Army Corps of Engineers
USEPA -	U.S. Environmental Protection Agency
USFWS -	U.S. Fish and Wildlife Service
USGS -	United States Geologic Survey
UST -	underground storage tank
UWMP -	Urban Water Management Plan
VHDR -	Very High Density Residential
VHFHSZ -	Very High Fire Hazard Severity Zone
VMT -	vehicle miles traveled
VOC -	volatile organic compound
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.

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

DETERMINATION: (To Be Completed By The Lead Agency)

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

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

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

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

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

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

Signature _____ Date _____

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

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

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

8) The explanation of each issue should identify:

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

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

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

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

Less Than Significant Impact. The City's General Plan 2025 Open Space and Conservation Element identifies scenic resources in the City and states that "the hillsides and ridgelines above Riverside offer scenic benefits to the community." Notably, Box Springs Mountain, Mount Rubidoux, Arlington Mountain, Alessandro Heights, and the La Sierra/Norco Hills are scenic resources and offer scenic views in the City (Riverside 2007a). The project site is not located near these scenic resources. Also, the Arlington Mountain to the east, Temescal Mountains to the south, and Mount Rubidoux to the west are barely visible from the site due to distance and intervening structures and trees.

The proposed project involves the redevelopment of a portion of a commercial plant nursery that is located within an urbanized area. The site is surrounded by the remaining portion of the plant nursery and existing commercial and residential developments in an area with no recognized scenic vistas. The proposed project would introduce two buildings and a gas station canopy. The proposed buildings would be single-story and located where boxed and potted plants, trailer/retail sales office, storage sheds, and surface parking area currently exist. While boxed trees and potted plants would be removed and larger structures and parking areas would be placed on the site, there are no major viewsheds from the site. The proposed project would reflect the types and density of existing commercial developments in the City and would not change views from and through the site. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista.

Furthermore, the project will be subject to design review by the City for compliance with the Citywide Design Guidelines. The City's General Plan 2025 policies are aimed at balancing development interests with broader community preservation objectives. Through project compliance and implementation of applicable General Plan objectives and policies and applicable zoning and development standards, design guidelines, and requirements, including General Plan Objectives LU-28, LU-29, and LU-30 and Policies LU 30.2 and LU-30.3 as they relate to enhancing the distinct character of neighborhoods, the potential direct, indirect, and cumulative impacts of the proposed project on scenic vistas are considered **less than significant**.

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

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; City's Urban Forestry Policy Manual; RMC Title 20 – Cultural Resources; and Caltrans Scenic Highway Mapping System)***

Less Than Significant Impact. The California Scenic Highway Program by the California Department of Transportation (Caltrans) classifies highways meeting specific criteria as "scenic" throughout the State. The purpose of the program is to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. According to Caltrans, "a highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view" (Caltrans 2018a). Review of the California Scenic Highway Mapping System shows that no officially designated Scenic Highways are located near the project site. State Route (SR-) 243 from Interstate (I-) 10 to SR-74 is the nearest officially designated State Scenic Highway, which is over 30 miles east of the site. I-15 from SR-91 to the San Diego County Line and SR-91 from I-15 to the Orange County line are eligible Scenic Highways located approximately 6.5 miles southwest of the site (Caltrans 2018b). Due to distance and intervening structures, terrain, and vegetation, the proposed project would not be visible from SR-243 and the segments of I-15 and SR-91 that are eligible Scenic Highways. The

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

proposed project would have no impact on these eligible and officially designated Scenic Highways and would not damage scenic resources, including trees, rock outcroppings, and historic buildings along a State Scenic Highway.

Figure CCM-4 in the Circulation and Community Mobility Element of the Riverside General Plan 2025 identifies Special Boulevards, Scenic Boulevards, and Scenic Parkways that require special landscaping and additional right-of-way, if needed. Van Buren Boulevard is designated as a Scenic Boulevard and Parkway, as identified in Section 5.1, Aesthetics of the City of Riverside General Plan and Supporting Documents EIR. However, in light of the improvements proposed along the project boundary (e.g., widening, sidewalk, and landscaped parkway), the potential visual impacts on Van Buren Boulevard would be less than significant. Lincoln Avenue is not a Special or Scenic Boulevard or Parkway. Thus, in the light of the above discussion, the proposed project would not have any effect on scenic resources within a scenic roadway. Also, no rock outcroppings or historic buildings are on or near the project site; no impacts to these resources would occur. Therefore, any potential adverse direct, indirect or cumulative impacts from the proposed project are considered **less than significant**.

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

1c. Response: ***(Source: Site Visit; General Plan 2025; General Plan 2025 FPEIR; and RMC Title 19 – Zoning)***

Less Than Significant Impact. The area surrounding the project site can be characterized as an urban area developed with various residential and retail commercial uses. As an infill-site, the existing visual character of the site is not such that would be impacted by the proposed project. The aerial photograph provided previously on Exhibit 2 shows the project site's relationship to the surrounding land uses.

The project site is part of a plant nursery, and on-site elevations range from approximately 856.5 feet above mean sea level (msl) along Lincoln Avenue to 848.8 feet above msl along Van Buren Boulevard, with a slope of about 2 percent across the site). A one-story trailer/retail sales office, storage sheds, and surface parking area are located at the southeastern section of the site. Gardening implements, utility vehicles, and small equipment are present throughout the site. Existing vegetation consists of trees, plants, and other landscape materials in wooden boxes, pots, and plastic containers. The visual character of the project site and surrounding areas is depicted in the site photographs presented on Exhibits 11 and 12.

As shown on Exhibit 11, views of the site from Van Buren Boulevard are dominated by the landscape vegetation behind a chain-link fence. Overhead utility lines on wooden poles line the dirt shoulder. No sidewalk or parkway planting are between the fence and the street curb. Views of the site from Lincoln Avenue are also dominated by landscape vegetation behind a chain-link fence. Boxed trees are located on the dirt shoulder, and an asphalt driveway extends from the street into the site. Views of the on-site parking lot and plants are provided on Exhibit 12 and show the trailer/retail sales office, and storage sheds beside the parking lot and rows of boxed trees and plants.

The proposed project would alter the visual character of the project site; and views from Van Buren Boulevard and Lincoln Avenue would change as the commercial landscape use is replaced by more formal landscaped areas and the dirt shoulders along the roads are replaced with concrete sidewalks and landscaped parkways, including street trees. The on-site trailer/retail sales office, and storage sheds would be replaced with a convenience store, gasoline pumps and canopy, and a restaurant building. The proposed buildings would be single-level; and the walls would feature painted, stucco, or cement plaster with stone veneer bases, glass windows and doors, clay tile roofs, and business identification signs. The parking area would also be larger than existing; and parking spaces, drive aisles, and parking islands would be defined. Although not part of the project, future block walls would be placed along the northwestern and southwestern site boundaries to separate the rest of the plant nursery from the site. Viewers at public vantage points on Van Buren Boulevard and Lincoln Avenue would readily see the changes in the visual quality of the site. In addition, limited views of the proposed project would be seen from the existing residential areas (private views) to the west, since residential structures, wood fences and proposed block walls, and the remaining portion of the plant nursery would separate the project from the residential streets and other public areas.

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

While views of the project would be possible from adjacent private developments, distance and intervening structures would also block these views. It should also be noted that while consideration is given to how the proposed project would alter the views for the existing residential uses, the focus of CEQA analysis is impacts from public views because private views are not protected

The proposed project is a redevelopment of a portion of a plant nursery that is located in an urbanized area; and the site is surrounded by existing urban developments, including commercial uses to the northeast and residential uses to the southeast and southwest. The project site is located within the City's Arlington South neighborhood, and the Riverside General Plan contains objectives and policies specifically for the Arlington South neighborhood, which seek to reinforce historic development patterns and spur economic revitalization. The project is consistent with these objectives and policies, as discussed under Threshold 11b in Section 11, Land Use and Planning. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality. Additionally, the proposed project would be designed to be compatible with the surrounding area and subject to design review by the City for compliance with the Citywide Design Guidelines (related to building placement and orientation, scale and mass, building modulation and articulation, site design, pedestrian space and circulation, privacy for residential units, open space, architectural style, materials and finishes, and color and texture) to prevent adverse impacts to the visual quality of the project area.

Therefore, the proposed project would not degrade the existing visual character of the area; and potential direct, indirect, and cumulative impacts on the visual character and quality of the area are considered **less than significant**.

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

1d. Response: ***(Source: General Plan 2025; General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area; and RMC Title 19- Zoning)***

Less Than Significant Impact. The project site is located in an area that is already subject to nighttime lighting from existing urban developments, including commercial parking lots, exterior residential lights, outdoor security lighting, and lighted signs. In addition, Van Buren Boulevard and Lincoln Avenue are lined with streetlights. The proposed project would introduce new light sources at the site during construction and operation. New sources of light and glare during project construction would primarily be for security purposes and would be temporary; this lighting would cease upon construction completion. New operational light sources would be typical of commercial uses and would include exterior building lights, parking lot lights, internal driveway and pathway lights, lighted signs, automobile headlights, security lighting, decorative landscape lighting, etc. These light sources would be similar to existing light sources at the adjacent commercial development that contribute to light and glare and affect the nighttime sky in the project area.

No light-sensitive uses are adjacent to the project site, since the site is bound by Lincoln Avenue and Van Buren Boulevard and the plant nursery. Existing commercial retail and residential uses in the vicinity are physically separated from the site by the roadways and nursery operations and would not be subject to light spillover from on-site lighting.

Future residential development is planned on the remaining parcel of APN 234-270-20 and would be located adjacent to the site. Block walls (not a part of project) and setbacks from the site boundaries would be provided between the project and this adjacent future residential development, in compliance with the City's zoning regulations. Further, on-site lights would be installed in compliance with Chapter 19.556 and Section 19.590.070 of the RMC. Chapter 19.556 sets forth standards to ensure that lighting provided for projects is adequate to light the project for safety while not causing light spillage onto neighboring properties. Section 19.590.070 establishes performance standards for light and glare and identifies required lighting for safety purposes (at entryways, along walkways, between buildings, and within parking areas), and minimum lighting levels and other lighting requirements, consistent with General Plan Policy PS-5.4.

The project site is also located outside the Mount Palomar Policy Area; thus, the project would not affect nighttime observations from the Mount Palomar Observatory. Therefore, less than significant impacts related to new light sources would occur with the project.

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

Glare is caused by light reflections from building materials, pavement, and vehicles, including reflective glass and polished surfaces. During daylight hours, the amount of glare depends on the intensity and direction of sunlight in relation to the presence of reflective materials. Glare can create hazards to motorists and nuisances for pedestrians and other viewers. As with typical convenience store and fast food restaurant buildings, the proposed project would not feature facades with mirrors, metallic surfaces, or glazing materials over large exterior surfaces, which may have the potential to create glare from sunlight. Rather, the proposed buildings would feature painted or textured facade materials with glass and glazing materials limited to doors and windows that would occupy relatively small, scattered areas of the building facades. Additionally, in compliance with Chapter 19.556 and Section 19.590.070 of the RMC, lighting would be directed, oriented, and shielded to prevent light from shining onto adjacent properties, public rights-of-way, and drive aisles in a manner that would obstruct drivers' vision. Therefore, less than significant impacts related to glare would occur with the project.

With project compliance with the City's regulations regarding light and glare (Chapter 19.556 and Section 19.590.070), a **less than significant impact** would occur directly, indirectly, or cumulatively from this project.

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 complied by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

2a. Response: ***(Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability and FMMP Riverside County Important Farmland 2016)***

No Impact. The California Department of Conservation administers the Farmland Mapping and Monitoring Program (FMMP) pursuant to Section 65570 of the California Government Code. Under the FMMP, the project site and the adjacent developed areas are designated as Urban and Built-Up Land. No Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance is located on or near the site. The project site and the surrounding area are not subject to agricultural activities. Rather, the project site is located within an urbanized area with surrounding commercial and residential uses. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 reveals that the site is not designated as, and is not adjacent to, the Arlanza-La Sierra Agricultural Area or the Arlington Heights Greenbelt nor is it adjacent to land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would have **no impact** directly, indirectly, or cumulatively on Farmland or agricultural uses.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

2b. Response: ***(Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves; General Plan 2025 FPEIR – Figure 5.2-2 - Williamson Act Preserves; Zoning Map of the City of Riverside; and RMC Title 19 –Zoning)***

No Impact. The project site is zoned R4 - Multiple-Family Residential, which does not allow agricultural uses. Areas near the project site are also not allowed to support agricultural uses under their current zoning designations. The proposed project includes a Rezone to CR – Commercial Retail, which would not allow agricultural uses. A review of Figure OS-3 in the General Plan 2025 and Figure 5.2-2 – Williamson Act Preserves in the General Plan 2025 FPEIR reveals that the project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. Therefore, the proposed project would have **no impact** directly, indirectly, or cumulatively.

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

2c. Response: ***(Source: Zoning Map of the City of Riverside; RMC Title 19 – Zoning; and General Plan 2025 Open Space and Conservation Element Figure OS-5 - Habitat Areas and Vegetation Communities)***

No Impact. The project site is currently used as a commercial plant nursery. As shown in Figure OS-5 - Habitat Areas and Vegetation Communities in the General Plan 2025 Open Space and Conservation Element, the project site and surrounding area do not support a riparian forest or woodland/forest vegetation. The site is zoned R4, which does not allow timberland uses. The proposed Rezone of the site to CR also would not allow timberland uses on the site. The on-site trees are in wooden boxes and are not part of a forest and thus, would not be considered timberland. Therefore, **no impact** to forest land, timberland, or forestry resources would occur from this project directly, indirectly, or cumulatively.

d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

2d. Response: ***(Source: General Plan 2025 Open Space and Conservation Element Figure OS-5 - Habitat Areas and Vegetation Communities and National Forest Locator Map)***

No Impact. The project site and surrounding areas do not support a riparian forest or woodland/forest vegetation, as shown in Figure OS-5 - Habitat Areas and Vegetation Communities in the General Plan 2025 Open Space and Conservation Element. The site is designated as Field Croplands, and existing vegetation at the project site is limited to boxed trees and potted plants that are for sale and used for landscaping. The nearest National Forest to the site is the Cleveland National Forest, located within the Santa Ana Mountains and approximately 10.0 miles southwest of the project site. The proposed project would have **no impact** on forest land directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

2e. Response: (*Source: General Plan 2025 Open Space and Conservation Element Figure OS-2 – Agricultural Suitability and Figure OS-3 – Williamson Act Preserves*; *FMMP Riverside County Important Farmland 2016; Zoning Map of the City of Riverside; RMC Title 19- Zoning; and National Forest Locator Map)*

Note: *For the purposes of this analysis, Farmland and agricultural land considered under this threshold include Farmland of Local Importance, land subject to Proposition R and Measure C, and land under Williamson Act Contract, as well as any other land being used for agricultural uses as non-conforming uses.*

No Impact. The FMMP identifies the site as Urban and Built Up Land and not as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. The project site is part of a commercial plant nursery (with container plants) and is located in an urbanized area of the City. The site does not support agricultural resources or operations. In addition, the site has no agricultural resource or operation, including farmland adjacent to the site. Farmland of Statewide importance is located southeast of the site on Van Buren Boulevard but is separated from the site by roads and residential developments. The proposed project would not result in the conversion of the nearby designated Farmland to non-agricultural uses.

The trees on the site are contained in wooden boxes; the project site and surrounding areas do not support trees that may be considered a forest. Therefore, the proposed project would not affect or convert forest land to other uses. **No impact** would occur from this project directly, indirectly, or cumulatively related to the conversion of Farmland to non-agricultural use or to the loss of forest land.

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?	☐	☐	☒	☐

3a. Response: *(Source: South Coast Air Quality Management District's 2016 Air Quality Management Plan (AQMP) and Air Quality Analysis prepared by Psomas in May 2018 [included in Appendix A])*

Less Than Significant Impact. An Air Quality Analysis was prepared for the proposed project (see Appendix A of this Initial Study) and is summarized below. On March 3, 2017, the South Coast Air Quality Management District (SCAQMD) adopted the 2016 Air Quality Management Plan (AQMP), which is a regional and multi-agency effort (SCAQMD, California Air Resources Board [ARB], Southern California Association of Governments [SCAG], and U.S. Environmental Protection Agency [USEPA]). The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS); updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State air quality standards.

For a specific project to be consistent with the AQMP, the pollutants emitted from the proposed project should not (1) exceed the SCAQMD CEQA air quality significance thresholds and (2) conflict with or exceed the assumptions in the AQMP.

The proposed project meets the first criterion. As discussed under Threshold 3b below, air pollutant emissions from the proposed project would be less than the SCAQMD thresholds and would not result in a significant impact.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
With respect to the second criterion, the site was recently rezoned, as part of the City's Housing Element update, to R-4 - Multi-Family Residential Zone, with a General Plan land use designation of VHDR -Very High Density Residential and is used as a plant nursery. The project would require a Rezone, a General Plan Amendment, and other discretionary approvals. Thus, it is not consistent with the land uses assumptions that were the basis for the growth projections provided by the City to SCAG for use in the growth forecasts in the 2016–2040 RTP/SCS and 2016 AQMP. However, projects that are consistent with the projections of employment and population forecasts identified by SCAG are considered consistent with the AQMP growth projections, since these forecast numbers were used by SCAG's modeling section to forecast travel demand and air quality for planning activities such as the RTP/SCS, the SCAQMD's AQMP, Federal Transportation Improvement Program (FTIP), and the Regional Housing Needs Allocation (RHNA) Plan. The project involves the development of a multi-tenant commercial building consisting of a drive through restaurant and retail uses, and a gas station and convenience store, which would not be expected to directly induce population growth in the City. The types of employment opportunities from these uses would likely be filled by the local labor pool. The project is estimated to generate 43 jobs, an increase of 38 jobs compared to the existing plant nursery. The additional employment positions would represent a negligible increase (approximately 0.03 percent increase) to the City's 2015 employment base of 136,185 jobs (SCAG 2017). Thus, the employment generated by the proposed project would have minimal impacts to SCAG's employment projections, which are the basis for the employment growth assumptions in the 2016 AQMP. The project site is currently designated in the General Plan as VHDR - Very High Density Residential, which allows a maximum of 40 dwelling units per acre, with a typical development density of 30 units per acre. The estimated daily trips from a 60-unit mid-rise apartment that could otherwise be developed on the project site is 325 daily trips. With the proposed General Plan Amendment and Rezone, the project is estimated to generate 2,737 daily trips, including 181 trips during the AM peak hour and 188 trips during the PM peak hour (Ganddini 2019). Although the project may generate more trips than was anticipated in the SCAG and AQMP planning documents, it is noted that the proposed commercial uses would serve the adjacent residential communities by providing a nearby food establishment and gasoline station that could be used as part of a passby trip, rather than a separate trip to a more distant location. The project would also help create a stronger identity for the neighborhood, by encouraging nearby residents to easily walk or bike to the businesses. The City of Riverside adopted the Riverside Restorative Growthprint – Economic Prosperity Action Plan and Climate Action Plan (RRG-EPAP/CAP) on January 5, 2016. The strategies in the RRG-EPAP/CAP include place-making, smart growth and infrastructure, and connected community that are supported by the project. Since the project's emissions would not exceed the SCAQMD significance thresholds, the project would not exceed employment projections used in the 2016 AQMP. The project would encourage walking and bike use by nearby residents and would not conflict with or obstruct the AQMP. Therefore, the proposed project would have a **less than significant impact** directly, indirectly, and cumulatively, as it relates to the implementation of an air quality plan.				
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

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

3b. Response: ***(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds; South Coast Air Quality Management District's 2016 AQMP; CalEEMod; and Air Quality Analysis prepared by Psomas in May 2018 [included in Appendix A])***

Less Than Significant Impact. The proposed project would generate air pollutant emissions primarily from (1) demolition of on-site asphalt pavement, which would require export of demolition and construction debris and removal and relocation of the boxed trees and potted plants, trailer/retail sales office, and storage sheds (estimated at 40 truckloads of exported materials); (2) on-site grading activities, which are expected to export 156 truckloads of soils; (3) construction and operation of the multi-tenant commercial building consisting of a drive through restaurant and retail uses, and gas station and convenience store; and (4) new vehicle trips coming to and from the project site.

A project may have a significant impact where project-related emissions of "criteria" air pollutants would exceed federal, State, or regional standards or thresholds or where project-related emissions would substantially contribute to an existing or projected air quality violation. Criteria air pollutants include the following, which are described in the Air Quality Analysis included in Appendix A of this Initial Study: ozone (O_3), respirable particulate matter with a diameter of 10 microns or less (PM10), fine particulate matter with a diameter of 2.5 microns or less (PM2.5), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. The SCAQMD has developed construction and operations thresholds to determine whether projects would potentially result in contributing toward a violation of ambient air quality standards. A project with daily emission rates that exceed the SCAQMD's thresholds (shown in Table 4 of the Air Quality Analysis in Appendix A of this Initial Study and in Tables 1 and 3 below) would have a significant effect on regional air quality.

Project emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 computer program. CalEEMod is designed to model construction and operational emissions for land development projects and allows for the input of project- and County-specific information. Construction of the proposed project is planned to begin in Spring 2020 and occur for 8 months, with operations starting in 2020. The CalEEMod input for construction emissions was based on the proposed project's construction assumptions and default assumptions from CalEEMod. The input for operational emissions was based on the vehicle trip generation rates provided in the Traffic Impact Analysis and the proposed building area. Additional input details are included in the Air Quality Analysis (refer to Attachment A of Appendix A of this Initial Study).

Construction Emissions

Air pollutant emissions would primarily occur from construction equipment exhaust; fugitive dust from demolition and site grading; exhaust and particulate emissions from trucks hauling demolition and construction debris, soil, and building materials to and from the project site and from vehicles driven to and from the site by construction workers; and volatile organic compounds (VOCs) from painting and asphalt paving operations. The proposed project would comply with applicable SCAQMD rules and regulations, including Rule 403 for fugitive dust control and Rule 1113 for architectural coatings. Rule 403 requires the implementation of dust control measures, including regular watering of active grading areas and unpaved roads, limiting vehicle speeds on unpaved surfaces, stabilizing stockpiled earth, and curtailing grading operations during high wind conditions. This is consistent with General Plan Objective AQ-4 and Policies AQ-4.2, AQ-4.3, and AQ-4.5. Watering of active grading areas is included in the CalEEMod emissions analysis and results in reduced PM10 and PM2.5 emissions. SCAQMD Rule 1113 limits the VOC content of architectural coatings. The emission reductions associated with compliance with this rule have also been included in the emissions calculations.

<u>Regional Emissions Thresholds – Maximum Daily Regional Emissions During Construction</u>

Table 1, Estimated Maximum Daily Construction Emissions, presents the estimated maximum daily emissions during construction of the proposed project and compares the estimated emissions with the SCAQMD's daily regional emission thresholds. As shown, project construction mass daily emissions would be less than the SCAQMD's thresholds for all criteria air pollutants. As such, emissions from construction activities would not violate any air quality standard or substantially contribute to an existing or projected air quality violation. Impacts would be less than significant, and no mitigation is required.

TABLE 1
ESTIMATED MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS

Year	Emissions (lbs/day)					
	VOC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
2019	8	28	16	<1	3	2
SCAQMD Thresholds (Table 4)	***75***	***100***	***550***	***150***	***150***	***55***
Exceeds SCAQMD Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compound; NOx: nitrogen oxides; CO: carbon monoxide; $_{SO2}$: sulfur dioxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

Source: SCAQMD 2015 (thresholds); see Attachment A in Appendix A of this Initial Study for CalEEMod model outputs.

Construction-Phase Localized Significance Thresholds

In addition to the mass daily emissions thresholds, short-term local impacts to nearby sensitive receptors from on-site emissions of NO_2, CO, PM10, and PM2.5 are examined based on SCAQMD's localized significance threshold (LST) methodology. To assess local air quality impacts for development projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating localized impacts.

The LST method is recommended for projects on 5 acres or less. For the purposes of an LST analysis, the SCAQMD considers receptors where it is possible that an individual could remain exposed for 1 hour to NO_2 and CO and for 24 hours for PM10 and PM2.5. These emissions limits in the lookup tables are based on the SCAQMD's Ambient Air Quality Standards.

The closest existing sensitive receptors to the project site include residences across Lincoln Avenue, approximately 85 feet from the project's southern boundary; other residences are located to the west (121 feet) and southeast (160 feet). Additionally, 5.34 acres of multifamily residential units have recently been entitled for development immediately to the west and north of the project site. There are various commercial uses at Lincoln Plaza 150 feet to the east (across Van Buren Boulevard); however, these would not be considered sensitive for purposes of this analysis. The LST emissions thresholds for receptors within 25 meters (82 feet) of the project site are used below. Thresholds for receptors farther away would be less stringent, and the project emissions would be a smaller fraction of the thresholds.

Table 2 shows the maximum daily on-site emissions for construction activities compared with the SCAQMD LSTs with receptors within 25 meters (82 feet). The project site covers approximately 1.49 acres in area. As per the SCAQMD, the thresholds shown are interpolated from the lookup tables for 1- and 2-acre sites, which are calculated based on the equipment mix and quantities for the most intensive construction phase. The project's maximum daily on-site emissions for NOx, PM10, and PM2.5 would occur during the grading phase; maximum on-site CO emissions would occur during the demolition phase. As shown in Table 2, the local emissions from the project would be less than the thresholds, and no significant impacts would result.

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

TABLE 2
CONSTRUCTION PHASE
LOCALIZED SIGNIFICANCE THRESHOLD EMISSIONS

Emissions and Thresholds	Emissions (lbs/day)			
	NOx	CO	PM_{10}	$PM_{2.5}$
Project maximum daily on-site emissions	24	13	3.4	2.2
Localized Significance Threshold	**144**	**743**	**5.5**	**3.5**
Exceed threshold?	**No**	**No**	**No**	**No**

lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter.

Note: Data is for SCAQMD Source Receptor Area 23, Metropolitan Riverside County

Source: SCAQMD 2009 (thresholds); see Attachment A in Appendix A of this Initial Study for CalEEMod model outputs.

Operational Emissions

Operational emissions are comprised of area, energy, and mobile source emissions. Area and energy source emissions are based on CalEEMod assumptions for the specific land uses and size. Mobile source emissions are based on estimated project-related trip generation forecasts, as contained in the Traffic Impact Analysis; the proposed project would generate 2,737 daily vehicle trips (Ganddini 2019). Estimated peak daily operational emissions are shown in Table 3. These estimates do not account for the reduction in vehicle trips and on-site emissions due to the displacement of a portion of the plant nursery.

TABLE 3
PEAK DAILY OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Area sources	<1	<1	<1	<1	<1	<1
Energy sources	<1	<1	<1	<1	<1	<1
Mobile sources	5	4	29	<1	5	1
Total Operational Emissions*	**5**	**4**	**29**	**<1**	**5**	**1**
SCAQMD Significance Thresholds	***55***	***55***	***550***	***150***	***150***	***55***
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SO_2: sulfur dioxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

Emissions in the table are the higher number of the estimated summer or winter emissions.

* Some totals do not add due to rounding.

Note: CalEEMod model data sheets are included in Attachment A of Appendix A of this IS/MND.

As shown in Table 3, the proposed project's operational emissions would be less than the SCAQMD CEQA significance thresholds for all criteria pollutants. Therefore, the proposed project's operational impact on regional emissions would be **less than significant**, and no mitigation is required.

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

Operations Phase Localized Significance Thresholds

The SCAQMD has also developed LSTs to assess potential local impacts to nearby sensitive receptors from on-site emissions of NO_2, CO, PM10, and PM2.5 generated during long-term operations. The operations phase LST analysis was also assessed using the emissions thresholds for receptors within 25 meters (82 feet) of the site. Table 4 shows the maximum daily on-site emissions for operational activities compared with the SCAQMD LSTs. As shown, the local emissions from the proposed project would be less than the thresholds, and no significant impacts would result.

TABLE 4
OPERATIONS PHASE
LOCALIZED SIGNIFICANCE THRESHOLD EMISSIONS

Emissions and Thresholds	Emissions (lbs/day)			
	NOx	**CO**	**PM10**	**PM2.5**
Project Maximum Daily On-Site Emissions				
Area	<1	<1	<0.1	<0.1
Energy	<1	<1	<0.1	<0.1
Mobile[a]	<1	2	0.3	0.1
Total	**1**	**2**	**<1**	**<1**
Localized Significance Threshold	**144**	**743**	**2**	**1**
Exceed threshold?	**No**	**No**	**No**	**No**

lbs/day: pounds per day; NOx: nitrogen oxides; CO: carbon monoxide; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

[a] On-site mobile emissions are conservatively assumed to be 5% of the total on- and off-site emissions.

Note: Data is for SCAQMD Source Receptor Area 23, Metropolitan Riverside County

Source: SCAQMD 2009 (thresholds); see Attachment A in Appendix A of this Initial Study for CalEEMod model outputs.

The proposed project would not generate pollutant emissions during short-term construction and long-term operation that would exceed SCAQMD thresholds for regional and local emissions. Thus, the proposed project would not result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation. The Air Quality Analysis has determined that project would have **less than significant impacts** related to the violation of an air quality standard directly, indirectly and cumulatively.

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?	☐	☐	☒	☐

3c. Response: ***(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds; South Coast Air Quality Management District's 2016 Air Quality Management Plan; CalEEMod; and Air Quality Analysis prepared by Psomas in May2018 [included in Appendix A])***

Less Than Significant Impact. The USEPA has established National Ambient Air Quality Standards (NAAQS) for the criteria air pollutants. ARB has also established standards for the criteria pollutants, known as California Ambient Air Quality Standards (CAAQS), and the State standards are generally more restrictive than the NAAQS. The CAAQS and NAAQS are provided in the Air Quality Analysis in Appendix A of this Initial Study. As identified in Table 5 below, the South Coast Air Basin (SoCAB) is a nonattainment area for CAAQS for O_3, PM10, and PM2.5 and for NAAQS for O_3 and PM2.5.

TABLE 5
ATTAINMENT STATUS OF CRITERIA POLLUTANTS
IN THE SOUTH COAST AIR BASIN

Pollutant	State	Federal
O_3 (1 hour)	Nonattainment	No standard
O_3 (8 hour)		Extreme Nonattainment
PM10	Nonattainment	Attainment/Maintenance
PM2.5	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Maintenance
SO_2	Attainment	Attainment
Lead	Attainment	Attainment/Nonattainment*
All others	Attainment/Unclassified	No standards

O_3: ozone; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; SoCAB: South Coast Air Basin.

* Los Angeles County is classified nonattainment for lead; the remainder of the SoCAB is in attainment of the State and federal standards.

Source: SCAQMD 2016; see Appendix A of this Initial Study for the Air Quality Analysis

As discussed under Threshold 3b above, the proposed project would generate PM10, PM2.5, NO_2, and O_3 precursors (NOx and VOC) during short-term construction and long-term operations. Thus, the proposed project would have an incremental contribution to O_3, PM10, and PM2.5 levels in the region.

Construction Activities

As discussed under Threshold 3b and quantified above in Tables 1 and 2, construction activities associated with the proposed project would result in less than significant construction-related regional and localized air quality impacts with compliance with applicable SCAQMD regulations. SCAQMD's policy with respect to cumulative impacts associated with criteria pollutants and their precursors is that impacts that would be directly less than significant would also be cumulatively less than significant (SCAQMD 2003). Therefore, consistent with SCAQMD policy, the cumulative construction impacts of the proposed project would also be less than significant.

Operational Activities

As shown in Tables 3 and 4 above, the proposed project's operational emissions for criteria pollutants would be below the SCAQMD CEQA significance thresholds. Therefore, the proposed project would not contribute to a cumulatively considerable net increase of a pollutant for which the SoCAB is in nonattainment. Emissions of nonattainment pollutants or their precursors from the proposed project would not be cumulatively considerable and would be less than significant.

Therefore, the cumulative air quality emissions impacts of the proposed project are considered **less than significant**.

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

3d. Response: ***(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds; South Coast Air Quality Management District's 2016 Air Quality Management Plan; CalEEMod; and Air Quality Analysis prepared by Psomas in May 2018 [included in Appendix A])***

Less Than Significant Impact. The SCAQMD defines a "sensitive receptor" as a land use or facility such as residences, schools, childcare centers, athletic facilities, playgrounds, retirement homes, and convalescent homes. The closest existing

sensitive receptors to the project site are single-family residences located across Lincoln Avenue, 85 feet south of the project site (refer to the aerial photograph provided on Exhibit 2). Additionally, high-density residential dwellings are planned immediately adjacent to the site along the north and west boundaries. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at-large. Exposure of sensitive receptors is typically addressed for the following situations, as applicable: CO hotspots; criteria pollutants and toxic air contaminants (TACs, specifically diesel particulate matter [DPM]) from on-site construction; exposure to off-site TAC emissions; and asbestos and lead-based paint during demolition. Operational, long-term TACs may be generated by some industrial land uses; commercial land uses (e.g., gas stations and dry cleaners); and diesel trucks on freeways. Residential land uses do not generate substantial quantities of TACs (due to the nature of residential uses and activities), whereas commercial and industrial uses that utilize large equipment may generate TACs.

Carbon Monoxide Hotspot

In an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations generally are found close to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (e.g., congested intersection) increases. Therefore, for purposes of providing a conservative worst-case impact analysis, CO concentrations are analyzed at congested intersection locations. If impacts are less than significant close to congested intersections, impacts also would be less than significant at more distant sensitive receptors and at other less congested intersection locations.

An initial screening procedure is provided in the *Transportation Project-Level Carbon Monoxide Protocol* (CO Protocol) to determine whether a project poses the potential to generate a CO hotspot. The key criterion is whether the proposed project would worsen traffic congestion at signalized intersections operating at level of service (LOS) E or F. If a project poses a potential for a CO hotspot, a quantitative screening is required.

The Traffic Impact Analysis prepared for the project indicates that signalized intersections near the site would not operate at LOS E or worse with and without the vehicle trips generated by the proposed project under the Existing and Opening Year scenarios (Ganddini 2019). Therefore, there would be no potential for a CO hotspot. The impact would be less than significant.

Criteria Pollutants from On-Site Construction

Exposure of persons to localized concentrations of NOx, CO, PM10, and PM2.5 emissions is discussed under Threshold 3b above. Impacts would be less than significant, and no mitigation is required.

Toxic Air Contaminant Emissions from On-Site Construction and Operation

Construction Activities

Construction activities would result in short-term emissions of DPM from the exhaust of off-road, heavy-duty diesel equipment used for site preparation (e.g., demolition, excavation, and grading), paving, building construction, and other miscellaneous activities. ARB identified DPM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments—which determine the exposure of sensitive receptors to TAC emissions—should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the proposed project.

Due to the size of the proposed project and project site, a limited number of off-road, heavy-duty diesel equipment would be in operation, and the total construction period would be relatively short (8 months) when compared to a 30-year exposure period. Combined with the highly dispersive properties of DPM and additional reductions in particulate emissions from newer

construction equipment, as required by USEPA and ARB regulations, construction emissions of TACs would not expose sensitive receptors to substantial emissions of TACs.

The Phase I and Phase II Environmental Site Assessment (ESA) for the site states that the structures on the site were constructed in the late 1990s or early 2000s. Thus, the presence of lead-based paint is considered unlikely. Additionally, as identified in the Addendum to Phase I and Phase II ESA, since the buildings that may contain these materials would be removed from the property, no further assessments of lead-based paint or asbestos are recommended. Impacts would be less than significant, and no mitigation is required.

Operational Activities

As part of the ARB Community Health Program, the ARB developed the Air Quality and Land Use Handbook: A Community Health Perspective (Handbook), which is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. The ARB's primary goal in developing this document is to provide information that will help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution (ARB 2005). Although the Handbook is concerned with siting sensitive land uses near sources of harmful air pollutants, the Handbook also serves as a guide to siting pollutant sources near sensitive land uses.

The proposed project's gasoline station is anticipated to have a throughput of 1.7 million gallons per year. Thus, it would not be considered a large gasoline dispensing facility. The SCAQMD's Rule 1401 Risk Assessment Program (version 8.1) was used to assess potential health risk associated with the proposed gasoline station. The results of this health risk analysis indicate that a Maximum Incremental Cancer Risk (MICR) of 7 in a million risk is associated with the nearest residential uses. The nearest residential uses are the planned multifamily residential uses located adjacent to the north and west of the project site. The nearest commercial uses would experience a MICR of less than 1 in a million. The SCAQMD has established a human health risk threshold of 10 in a million (SCAQMD 2015). Because the project would result in health risks which are below the SCAQMD's significance threshold. The human health risk impacts would be less than significant impact directly, indirectly, or cumulatively.

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

3e. Response: ***(Source: Air Quality Analysis prepared by Psomas in May 2018 [included in Appendix A])***

Less than Significant Impact. The proposed project may generate odors during short-term construction and long-term operations and use.

Construction Activities

Construction of the proposed project would involve the use of equipment and activities that would generate odors. Potential construction-related odors include diesel exhaust from construction equipment, as well as roofing, painting, and paving operations. Situations would occur where construction activity odors could be noticed by persons in the immediate vicinity. These odors would be temporary and would dissipate rapidly from the source (i.e., the project site) with an increase in distance. Therefore, the presence of potential construction-related odors at the site would be short-term and would not affect a substantial number of people. As such, a less than significant impact would occur.

Operational Activities

Potential operational odors could be created by cooking activities and trash storage associated with the proposed fast food restaurant. These odors would be similar to those at existing restaurant uses near the site (at Lincoln Plaza) and throughout the City, and odors would be generally confined to the immediate vicinity of the proposed restaurant.

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

With respect to operation of the gas station, gas pumping activities are also expected to generate odors associated with gasoline fumes. The gas pumps and underground storage tanks will include ARB-required vapor recovery systems that would control VOC vapor releases during refueling and would minimize driver and employee exposure to gasoline odors and fumes. Thus, gasoline odors are not expected to adversely affect adjacent land uses.

According to the SCAQMD's CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not propose any use identified by the SCAQMD as being associated with objectionable odors; and, therefore, the proposed project would not produce objectionable odors during operation.

Less than significant impacts related to the creation of objectionable odors would occur directly, indirectly, or cumulatively.

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

4a. Response: ***(Source: Site Visit; Western Riverside County MSHCP and California Natural Diversity Database [CNDBB]) database searches; General Plan 2025 Open Space and Conservation Element Figure OS-5 – Habitat Areas and Vegetation Communities, Figure OS-6 – Stephens' 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, and Figure 5.4-8 – MSHCP Burrowing Owl Survey Area; U.S. Fish and Wildlife Service [USFWS] Critical Habitat for Threatened and Endangered Species; and Burrowing Owl Habitat Assessment prepared by Psomas in April 2018 (included in Appendix B])***

Less than Significant Impact with Mitigation Incorporated. As shown on Exhibit 2, the project site is part of a plant nursery and includes a trailer/retail sales office, storage sheds, a surface parking lot, and boxed trees and potted plants. Figure OS-5 Habitat Areas and Vegetation Communities in the Open Space and Conservation Element of the General Plan shows that the site supports field croplands. The soils are highly compacted and devoid of vegetation. The site only has boxed landscaping plant materials that are for sale, and no agricultural crops are on the project site.

The site is located outside designated Core Reserves for the Stephens' Kangaroo Rat and is not located within designated critical habitats for Threatened and Endangered species. The site is also outside Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Cores and Linkages, Criteria Cell, and Subunit Areas. It is also outside the Narrow Endemic Plant Species Survey Area and Criteria Area Species Survey Area and is not subject to the Urban/Wildlands Interface Guidelines, as the site is surrounded by urban development on all sides.

However, the site is within the Burrowing Owl Survey Area. A habitat assessment for the burrowing owl was performed and indicated that the project site and the 500-foot buffer around the site do not contain sufficient foraging habitat to support the burrowing owl. Also, no evidence of California ground squirrel or other burrowing mammal was observed on any portion of the site or within the 500-foot buffer. No other cavity that is potentially suitable for burrowing owl occupation was observed during the survey. In addition, no burrowing owl or sign of burrowing owl was observed within the project site or 500-foot buffer. Thus, the burrowing owl is not expected to be present on the site or within the 500-foot buffer, and no impact to the burrowing owl would occur with the project. Also, no subsequent focused burrow or owl survey is warranted.

The Federal Migratory Bird Treaty Act (MBTA) makes it illegal to take, possess, buy, sell, purchase, or barter any migratory bird listed in the Code of Federal Regulations (Title 50, Part 10), including feathers, nests, eggs, or other avian products. The

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

MBTA also protects the active nests of all bird species, including common species. The trees and plants on the site may support nesting birds. Thus, removal/relocation of the boxed trees and potted plants during the nesting season could impact an active nest.

To prevent impacts to nesting birds and their eggs and nests, removal/relocation of the boxed trees and potted plants should occur outside the nesting bird season (between September 1 and February 15). If removal/relocation occurs during the nesting season (between February 16 and August 31), potential impacts to nesting birds shall be avoided by implementation of Mitigation Measure (MM) BIO-1, which requires a pre-construction survey for nesting birds and describes the methods for managing any active nest sites, if encountered. Implementation of MM BIO-1 would reduce potential impacts related to nesting birds to a less than significant level.

MM BIO-1 To avoid impacts on nesting birds, trees and plants shall be removed/relocated between September 1 and February 15 of the following year. If tree and plant removal will occur inside the peak nesting season (between February 16 and August 31), a pre-construction survey shall be conducted by a qualified Biologist to identify if there are any active nesting locations on the site and the construction areas. If the Biologist does not find any active nests within this area, then tree and plant removal shall be allowed. If the Biologist finds an active nest within the area and determines that the nest may be impacted by tree and plant removal activities, the Biologist shall delineate an appropriate buffer zone around the nest depending on the species and the type of construction activity. Tree and plant removal, demolition, and construction activities shall be prohibited in the buffer zone until a qualified Biologist determines that the nest has been abandoned.

With MM BIO-1, the proposed project would have a **less than significant impact after mitigation** directly, indirectly, and cumulatively on species identified as candidate, sensitive, or special status species in local or regional plans, and policies or regulations of the California Department of Fish and Wildlife (CDFW) or USFWS.

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

4b. Response: ***(Source: Site Visit; General Plan 2025 Figure OS-5 – Habitat Areas and Vegetation Communities and Figure OS-4 – Arroyos; and Western Riverside County MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)***

No Impact. The project site is located on a highly disturbed site within an urbanized area of the City where no riparian habitat or other sensitive natural community exists. The site is also not located in an area the Riverside General Plan has identified as an arroyo, open water, vernal pool, riparian forest, riparian scrub, or other natural community. Further, the surrounding area has been developed for many years; and a long history of disturbance exists in the area, such that there is little chance that any riparian habitat could have persisted. Therefore, the proposed project would have **no impact** on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW or USFWS directly, indirectly, and cumulatively.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

4c. Response: ***(Source: General Plan 2025 Open Space and Conservation Element Figure OS 8.1 – Rivers, Creeks and Streams; USGS National Map Viewer; and USFWS National Wetlands Inventory)***

No Impact. Figure OS 8.1 – Rivers, Creeks and Streams in the Open Space and Conservation Element of the General Plan shows that the site is not located near the Santa Ana River, Arlington Canal, Temescal Creek, or other blueline streams in and near the City. The USFWS National Wetlands Inventory and U.S. Geological Survey (USGS) National Map Viewer do not

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

show blueline streams, wetlands, riparian areas, or riparian mapping areas on the project site or near the site. The site and surrounding areas are served by concrete-lined and underground storm drain lines that convey storm water to the Prado Basin, located over 9.0 miles southwest of the project site. No state or federally protected wetlands, (including, but not limited to, marsh, vernal pool, coastal, etc.), are on or near the site. The project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and, thus, does not include U.S. Army Corps of Engineers (USACE) jurisdictional drainages or wetlands. Therefore, the proposed project would have **no impact** to state or federally protected wetlands directly, indirectly, and cumulatively.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒

4d. Response: ***(Source: Site Visit; Western Riverside County MSHCP; and General Plan 2025 Figure OS-7 – MSHCP Cores and Linkages)***

No Impact. The project site is within an urbanized area; is surrounded by existing urban developments; and is not located within any Western Riverside County MSHCP Criteria Cells, Cores, or Linkages. It is also not located near the Sycamore Canyon Wilderness Park or the Box Springs Mountain Regional Park, between Box Springs Mountain Reserve and the Santa Ana River via Springbrook Wash, or between the Santa Ana River and La Sierra/Norco Hills, which all serve as wildlife corridors in the City. In addition, the site is not located near the Tequesquite, Prenda, or Alessandro arroyos, which are also considered valuable wildlife corridors in the City.

Rather, the site is surrounded by urban uses, with commercial development to the east and northeast; residential uses to the southeast, south, and southwest; and the remaining areas of the plant nursery to the southwest and northwest. The site is not adjacent to large open space areas and water bodies that support wildlife movement. Thus, the proposed project would not result in a barrier to the movement of any native resident or migratory fish or wildlife species or within established native resident or migratory wildlife corridors, nor impede the use of native wildlife nursery sites. Therefore, the proposed project would have **no impact** to wildlife movement directly, indirectly, and cumulatively.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

4e. Response: ***(Source: RMC Title 16- Buildings and Construction, Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee; and City of Riverside Urban Forestry Policy Manual)***

Less Than Significant Impact. The proposed project is subject to applicable federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. Any project within the City of Riverside's boundaries that proposes planting a street tree within a City right-of-way is required to follow the City's Urban Forestry Policy Manual. The Manual includes guidelines for the planting, pruning, preservation, and removal of all trees on City rights-of-way. The guidelines are based on national standards for tree care, as established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. Generally, all California and Mexican fan palms, Mexican blue palms, Guadalupe palms, Queen palms, windmill palms, and in some cases date palms and Canary Island date palm trees, require relocation and preservation unless approved by the Riverside Parks and Recreation Commission.

Existing boxed trees and potted plants on the site would be removed, and new landscaped areas would be provided along site setbacks and around the proposed convenience store and restaurant buildings. The existing boxed trees along Lincoln Avenue would also be removed and street trees planted in the proposed parkways along abutting streets in compliance with the City's Urban Forestry Policy Manual and consistent with Objective LU-27 and Policies LU-27.1 and AQ-8.28. Setback areas and areas around the proposed buildings would be landscaped, consistent with Riverside General Plan Policy LU-27.4. Compliance with City requirements would prevent adverse impacts related to tree preservation policies.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In addition, the proposed project would pay the applicable Western Riverside County MSHCP local development mitigation fee, in compliance with Section 16.72.040 of the RMC. Therefore, impacts related to policies or ordinances protecting biological resources would be **less than significant** directly, indirectly and cumulatively.				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

4f. Response: ***(Source: Western Riverside County MSHCP; General Plan 2025 Figure OS-6 – Stephens' 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; El Sobrante Landfill Habitat Conservation Plan; and Burrowing Owl Habitat Assessment prepared by Psomas in April 2018 (included in Appendix B])***

No Impact. The project site is located outside the core reserves for the SKR and outside the boundaries of the HCPs for the El Sobrante Landfill and Lake Mathews. The site is within the 1.26-million-acre planning area for the Western Riverside County MSHCP. This MSHCP protects 146 plant and animal species on 500,000 acres of existing and future open space areas in the Western Riverside region. It is used to regulate the "take" of plant and wildlife species identified for protection within the planning area and promotes the acquisition of conservation lands and reserves for protected species. The MSHCP consistency analysis is provided below:

MSHCP Requirements

The project site is not located within the Western Riverside County MSHCP-designated Conserved Lands, Conservation Easements, Special Linkage Areas, or Criteria Areas (which include lands that may be acquired for conservation by the Western Riverside County Regional Conservation Authority [RCA]). The site is within the burrowing owl survey area; and a site survey and habitat assessment for the burrowing owl was performed, as discussed above.

MSHCP Section 6.1.2 Riparian/Riverine Areas and Vernal Pools

As discussed above, no jurisdictional drainages are on or near the site. Also, no riparian/riverine or vernal pool habitats or vegetation and soils that characterize riparian/riverine or vernal pool habitats are on the site. No riparian/riverine species were found on the site. No depressions or areas where water could pool were observed on the site, and no suitable habitat for the fairy shrimp is present.

MSHCP Section 6.1.3 Narrow Endemic Plant Species

The site is not located in the MSHCP Narrow Endemic Plant Species or Criteria Area Species Survey Areas. The soils on site do not meet the requirements of any Narrow Endemic Plant Species. The site has highly compacted soils and only has landscaping trees/plants in wooden boxes or other containers. No signs of narrow endemic plants were observed during the biological survey.

MSHCP Section 6.1.4 Urban/Wildlands Interface

The site is surrounded by urban development, with Van Buren Boulevard and Lincoln Plaza shopping center to the northeast, Lincoln Avenue and single-family residences to the southeast and southwest, the remaining areas of the plant nursery to the southwest and northwest, single-family residences farther west, and the Canyon Park apartments farther northwest. Since the site is not located near MSHCP Conserved Lands, Conservation Easements, Special Linkage Areas, or Criteria Cells, the Urban/Wildlands interface guidelines are not applicable.

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

MSHCP Section 6.3.2 Additional Survey Needs and Procedures - Burrowing Owl

The field survey and habitat assessment for the burrowing owl did not find burrowing owls, burrowing owl sign, burrows, or suitable habitat for the burrowing owl on and near the site.

Development of the proposed project would be consistent with the Western Riverside County MSHCP, with payment of the MSHCP local development mitigation fee to the RCA, in accordance with Chapter 16.72.040 of the RMC.

Since the project site is highly disturbed and located within an urbanized area, the project would not conflict with an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or State habitat conservation plan directly, indirectly, and cumulatively. Therefore, the proposed project would have **no impact** on 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 pursuant to §15064.5 of the CEQA Guidelines?	☐	☐	☐	☒

5a. Response: ***(Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas; General Plan 2025 Land Use and Urban Design Element Figure LU-5 – Historic Fabric; General Plan 2025 FPEIR Appendix D – Cultural Resources Study for the City of Riverside; and Cultural Resource Literature Review prepared by Psomas in May 2018 [included in Appendix C])***

No Impact. A discussion of the cultural background and history of the City is provided in the Cultural Resource Literature Review included in Appendix C of this Initial Study, with major historic periods defined as the Spanish Period (1769-1822, Mexican Period (1822-1848), and American Period (1848-Present). Local history includes habitation of the valley near the Santa Ana River and between the Rubidoux and Box Springs Mountains by Cahuilla tribes of Native Americans for hundreds of years before Europeans settled and established missions in the area in the early 1770s. With secularization in 1834, large land grants were given to the earliest European and American settlers. The City was founded in 1870 by John North and a group of Easterners who wished to establish a colony dedicated to furthering education and culture on land that was once a Spanish rancho. At the turn of the twentieth century, the City had the most successful agricultural cooperative (California Fruit Growers Exchange) and a world class research institution (Citrus Experiment Station). Structures for agri-industrial and railroad uses, as well as mansions and citrus worker housing, were built. Chinese, Japanese, Korean, Italian, and Mexican immigrants came as labor groups for the citrus industry, resulting in ethnic diversity in the area. The Post World War I boom resulted in the subdivision of large properties in the City into residential tracts. During the 1950s and 1960s, Riverside was one of the fastest growing cities in the western United States. Decreases in agricultural dependence and development pressures led to the replacement of orange groves and orchards with tract homes, shopping centers, banks, and public facilities.

The project site consists of a single parcel in the western portion of Riverside within the Arlington South neighborhood. While the City of Riverside's Downtown area started its development in the late 1880s, the surrounding areas did not experience much development until the 1950s. Review of historic aerial photographs and topographic maps shows that the project site and the surrounding land were used for agricultural purposes (i.e., row crops and orchards) through the 1960s. During the early 1970s, development in the land surrounding the project site was initiated. By 1975, the residential community south of Lincoln Avenue was built. The residential community to the west was built sometime between the late 1980s and early 1990s. The project site and the rest of the plant nursery parcel were used for agricultural purposes until 2009. In 2010, the site and the adjacent areas were used as a plant nursery. A structure (trailer/retail sales office) was built on the southeast corner of the property between 1995 and 2001; the structure is still located on the property, but a structural addition (storage sheds) was added next to the building in 2015.

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

No prior buildings were present on the site that were considered historic resources in the City's General Plan 2025 or the FPEIR for the General Plan. Review of the City's Historic Districts and Buildings shows that the nearest historic resource is Victoria Avenue, located approximately 0.3 mile to the southeast.

Psomas conducted a cultural resources records search and literature review for the proposed project on April 3, 2018, at the Eastern Information Center (EIC) at University of California, Riverside. The records search indicated that 24 cultural resources investigations have been conducted within a 0.5-mile radius of the project site, and one investigation included a portion of the project site. No resources have been recorded within the project area; however, three historic resources have been recorded within a 0.5-mile radius of the project area. These consisted mainly of historic properties; none of which were located on the project site. Therefore, **no impact** directly, indirectly, and cumulatively to historical resources is expected with the proposed project.

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

5b. Response: ***(Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity; General Plan 2025 FPEIR Appendix D – Cultural Resources Study; and Cultural Resource Literature Review prepared by Psomas in May 2018 [included in Appendix C])***

Less Than Significant Impact with Mitigation Incorporated. The sequence of the later prehistoric periods of Southern California include Horizon I: Early Man or Paleo-Indian Period (11,000 Before Common Era [BCE] to 7,500 BCE); Horizon II: Milling Stone Assemblages (7,500 BCE to 1,000 BCE); Horizon III: Intermediate Cultures (1,000 BCE to 750 Common Era [CE]); and Horizon IV: Late Prehistoric Cultures (750 CE to 1769 CE). This was followed by the major historic periods: Spanish Period (1769–1822); Mexican Period (1822–1848); and American Period (1848–Present). A detailed discussion of the ethnographic background and history of the City is provided in the Cultural Resource Literature Review included in Appendix C of this Initial Study.

The project site is located in the region known to have been occupied by the Cahuilla Indians. Cahuilla territory is bounded on the north by the San Bernardino Mountains; on the east by the Orocopia Mountains; on the west by the Santa Ana River, the San Jacinto Plain, and the eastern slope of the Palomar Mountains; and on the south by Borrego Springs and the Chocolate Mountains. The project site was also within the territory occupied by the Luiseño, named by the Spanish after the Mission San Luis Rey de Francia in the present-day City of Oceanside, where some of their linguistic group frequented. The Luiseño cultural area incorporated southern Riverside County, northern San Diego County, and eastern Orange County; and the area linguistically composed a language of the Shoshonean language family. As stated above, the valley near the Santa Ana River and between the Rubidoux and Box Springs Mountains was inhabited by Cahuilla tribes of Native Americans for hundreds of years before Europeans settled and established missions in the area in the early 1770s.

Figure 5.5-1 in the FPEIR for the General Plan 2025 shows that the site is located in an area with unknown archaeological sensitivity, and Figure 5.5-2 shows the site has unknown prehistoric cultural resources sensitivity. A cultural resources records search and literature review for the proposed project was conducted by Psomas at the EIC on April 3, 2018. The search did not identify archaeological resources at the project site or surrounding areas. Cultural resources recorded within a 0.5-mile radius of the project site consisted mainly of historic properties, none of which were located on the project site.

The project site is located in a highly urbanized area, and the site is part of a plant nursery with a paved parking lot and a highly compacted soil surface. Thus, no archaeological field survey was necessary or conducted. Fill soils occur to depths of up to 4 feet at the project site, and the Preliminary Soil Investigation Report for the proposed project (refer to Section 6, Geology and Soils, of this Initial Study) recommends that underlying soils be overexcavated by at least 5 feet. Thus, the majority of grading activities on the site would be limited to the upper 5 feet of soils. However, certain grading and excavation activities on the property, such as deeper excavations for infrastructure improvements (i.e., utility line trenching, underground storage tanks, storm water infiltration chambers, and gas pump canopy foundations), would disturb underlying native soils to greater depths. Thus, archaeological materials, such as historic refuse, disturbed archaeological sites, or other resources, have the potential to be discovered during grading activities that may extend into native soils and deeper excavation activities

during construction of the proposed project. Implementation of MMs CUL-1 and CUL-2, which require retention of a qualified Archaeologist and a pre-grade conference/cultural sensitivity training to inform construction personnel of the potential for encountering unique cultural resources, and MM CUL-3, which requires the Archaeologist to evaluate unanticipated archaeological discoveries, would reduce potential impacts to a level considered less than significant. This is consistent with General Plan Objective PS-11 and Policies PS-11.3 and HP-1.3.

MM CUL-1 **On Call Project Archeologist:** Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a Secretary of Interior Standards -- qualified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Archaeologist and Paleontologist shall be on call during all grading and other significant ground-disturbing activities in native sediments.

MM CUL-2 **Cultural Sensitivity Training:** The project Archaeologist and Native American Tribes consulting on the project shall attend the pre-grading meeting with the Developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign in sheet for attendees of this training shall be included and submitted to the Archeologist.

MM CUL-3 **Treatment and Disposition of Cultural Resources:** In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. ***Temporary Curation and Storage***: During the course of construction, all discovered resources shall be temporarily curated in a secure location on-site or at the offices of the project Archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite 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 Code of Federal Regulations (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. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and.
    d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each

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

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.

With the implementation of MMs CUL-1, CUL-2, and CUL-3, impacts to archaeological resources directly, indirectly, and cumulatively as a result of the proposed project would be reduced to a **less than significant level with mitigation**.

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

5c. Response: ***(Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity and Cultural Resource Literature Review prepared by Psomas in May 2018 [included in Appendix C])***

Less Than Significant Impact. The site was previously an orchard and agricultural field and is now used as a commercial plant nursery. The literature review and record searches conducted as part of the Cultural Resource Literature Review did not provide any indication that human remains are present on or near the site. Thus, human remains have a limited potential to be present on site, and the proposed project is not expected to disturb human remains.

Figure 5.5-1 in the FPEIR for the General Plan 2025 shows that the site is located in an area with unknown archaeological sensitivity, and Figure 5.5-2 shows the site has unknown prehistoric cultural resources sensitivity. Thus, excavation and soil disturbance could have the potential to disturb or destroy unknown buried Native American human remains and other human remains, including those interred outside formal cemeteries. Should grading and excavation activities for construction of the proposed project unearth unknown human remains or unknown burials, compliance with existing regulatory requirements under Section 7050.5 of the California Health and Safety Code is required. This regulation states all ground-disturbing activities, including grading and excavations, must immediately stop after the discovery of human remains; and the County Coroner must be notified of the discovery. Construction activities will be prohibited in areas that contain human remains and in the adjacent areas that may contain additional remains or contextual information. Construction activities shall cease in the area until the County Coroner has determined the appropriate treatment and disposition of the human remains.

If the Coroner, or approved representative of the Coroner, determines the remains are consistent with Native American human remains, the Coroner will notify the Native American Heritage Commission (NAHC) within 24-hours, per Public Resource Code 5097.91. The NAHC will establish a protocol to proceed after identifying the people or persons believed to be the most likely descendant (MLD) as required by Public Resource Code 5097.98. The descendant(s) will inspect the remains within 48 hours of being granted access to the site. Prior to resuming construction activities in the area, a Treatment Plan must be created and approved in coordination with the MLD, NAHC, and the property owner. Compliance with the requirements of the California Health and Safety Code and California Public Resources Code would ensure that potential impacts to human remains, including those interred outside formal cemeteries, are **less than significant** directly, indirectly, and cumulatively.

6. ENERGY

Would the project:

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

6a. Response: ***(Source: General Plan 2025 Open Space and Conservation Element, Green Action Plan, and Economic Prosperity Action Plan and Climate Action Plan)***

Section 21100(b)(3) of the *California Public Resources Code* and Appendix F to the State CEQA Guidelines require a discussion of potential energy impacts of proposed projects. Appendix F states:

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

The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

(1) Decreasing overall per capita energy consumption,

(2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and

(3) Increasing reliance on renewable energy sources.

The Riverside Public Utilities (RPU) and the Southern California Gas Company (SCGC) are utility companies that currently provide and would continue to provide electrical and natural gas services to the project site. The City of Riverside has made energy efficiency and conservation a priority. The Open Space and Conservation Element of the General Plan, the Green Action Plan and the Economic Prosperity Action Plan and Climate Action Plan details goals and measures adopted by the City to reduce and conserve energy. Compliance with energy efficiency and conservation policies and regulations is discussed in this section.

The Open Space and Conservation Element of the General Plan (Riverside 2012) provides for the following policies relative to energy use in the City of Riverside.

Objective OS-8: Encourage the efficient use of energy resources by residential and commercial users.

- Policy OS-8.1: Support the development and use of non-polluting, renewable energy sources.
- Policy OS-8.2: Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24 and encourage the installation of conservation devices in existing developments.
- Policy OS-8.3: Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources.
- Policy OS-8.6: Require all new development to incorporate energy-efficient lighting, heating and cooling systems pursuant to the Uniform Building Code and Title 24.
- Policy OS-8.7: Encourage mixed use development as a means of reducing the need for auto travel.
- Policy OS-8.12: Require bicycle parking in new non-residential development.

The City's Green Action Plan (Riverside 2019) has established goals for energy, greenhouse gas emissions, waste, urban design, urban nature, transportation, water, and healthy communities. The following are the Green Action Plan's goals related to energy.

- Goal 1 Increase the use of non-greenhouse gas (GHG) emitting energy by 2020 to 50% with at least 33% coming from renewable sources.
- Goal 2 Save 1% of communities load annually based on a 2004 baseline and reduce the City's peak electrical load demand by 10% overall.
- Goal 3 Install at least 20 MW of photovoltaic (PV) systems by 2020.

The goals of the Green Action Plan related to energy pertain to Citywide goals, but energy efficiency is being incorporated on the local level through energy efficiency requirements under the State's Title 24 energy efficiency measures as well as the City's public outreach programs on the "Go Green" webpage of the Green Riverside website.

The City has also published the Economic Prosperity Action Plan and Climate Action Plan which works to combine the Economic Prosperity Action Plan and the Climate Action Plan. The combination of these plans provides a vision of Riverside's "green" economy based on sustainable businesses. This Plan contains GHG reduction measures organized into four primary sectors, as defined by the following policy goals:

Energy - Energy measures will increase community-wide building and equipment efficiency and renewable energy use and promote energy efficiency and renewable energy generation for use supporting municipal operations that support the community.

Transportation and Land Use - Transportation and land use measures will reduce single-occupancy vehicle travel, increase non-motorized travel, improve public transit access, increase motor vehicle efficiency, encourage alternative fuel vehicles and promote sustainable growth patterns.

Water - Water measures will conserve potable water and reduce water demand by the community and municipal operations.

Solid Waste - Solid waste measures will reduce solid waste sent to landfills that is generated by the community and municipal operations.

The State of California has adopted efficiency design standards within the Title 24 Building Standards and CALGreen requirements. Title 24 of the *California Code of Regulations* (CCR, specifically, Part 6) is California's Energy Efficiency Standards for Residential and Non-residential Buildings. Title 24 was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and to provide energy efficiency standards for residential and non-residential buildings. The 2016 Title 24 energy are the currently mandated building standards. The upcoming 2019 Title 24 Building Standards become effective for projects that obtain their building permits on or after January 1, 2020.

The 2016 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen Code, contains mandatory requirements for new residential and nonresidential buildings throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the Code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. The regulation of energy efficiency for residential and non-residential structures is established by the California Energy Commission (CEC) and its California Energy Code. The proposed project is required to be consistent with these objective and policies.

Construction

Project construction would require the use of construction equipment for grading and building activities; all off-road construction equipment is assumed to use diesel fuel. Construction also includes construction workers' vehicular trips and vendors traveling to and from the project site. Off-road construction equipment use was calculated from the equipment data (mix, hours per day, horsepower, load factor, and days per phase) provided in the CalEEMod construction output files included in Appendix A of this IS/MND. The total horsepower hours for the project was multiplied by fuel usage estimates per hours of construction activities included in the OffRoad Model.

Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total vehicle miles traveled (VMT) was calculated for each type of construction-related trip and divided by the corresponding miles per gallon factor using California Air Resources Board's (CARB's) EMFAC 2014 model. EMFAC provides the total annual VMT and fuel consumed for each vehicle type. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks. Calculations are included in Appendix D of this IS/MND.

As shown in Table 6, a total 12,546 gallons of diesel fuel and 65 gallons of gasoline is estimated to be consumed during project construction.

TABLE 6
ENERGY USE DURING CONSTRUCTION

Source	Gasoline - gallons	Diesel Fuel - gallons
Off-road Construction Equipment	0	11,603
Worker commute	50	0
Vendors	5	0
On-road haul	11	943
Totals	65	12,546
Sources: Psomas 2019 based on data from CalEEMod, OffRoad and EMFAC2014.		

Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Furthermore, there are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the State. Energy used in the construction of the project would enable the development of buildings that meet the latest energy efficiency standards as detailed in California's Title 24 building standards. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operations

The proposed project would promote building energy efficiency through compliance with energy efficiency standards (2016 Title 24 and CALGreen). The energy consumption associated with the project is shown in Table 7 below.

TABLE 7
ENERGY USE DURING OPERATIONS

Land Use	Gasoline (gallons/year)	Diesel (gallons/year)	Natural Gas (kBTU/yr)	Electricity (kWh/yr)
Project Land Uses	88,949	2,195	718,392	181,402
Sources: Psomas 2019				

As discussed in Threshold Response 8a in Section 8.0, Greenhouse Gas Emissions, the proposed commercial uses would serve the adjacent residential communities by providing a local food establishment, retail uses and gasoline station that could be used as part of a passby trip, rather than a separate trip to a more distant location. The project would also help create a stronger identity for Lincoln Plaza area by encouraging nearby residents to easily walk or bike to the businesses. As such, the project would further serve the retail needs of the local community and potentially reduce vehicle trips and trip lengths and the associated energy related to transportation. The project structures would also comply with the requirements of the State's Title 24 and CalGreen requirements which reduce electrical, heating, solid waste disposal and water demands. Therefore, the proposed project would not result in an inefficient, wasteful, or unnecessary consumption of energy. Calculations are included in Appendix D of this IS/MND.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

6b. Response: ***(Source: General Plan 2025 Open Space and Conservation Element, Green Action Plan, and Economic Prosperity Action Plan and Climate Action Plan)***

The project would be required to comply with the State of California's Title 24 Building Standards and CalGreen requirements for energy efficiency. In addition, the project would also provide walkable commercial service options to the local community thereby potentially reducing some vehicle trips and the energy required for transportation. As such, the project would be consistent with the energy efficiency and transportation goals established within the City's Open Space and Conservation Element, Green Action Plan, and Economic Prosperity Action Plan and Climate Action Plan. Because the project complies with the latest applicable energy efficiency standards, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be **less than significant**.

7. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒

7ai. Response: ***(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones; General Plan 2025 FPEIR Figure 5.6-2 – Faults and Fault Zones and Appendix E – Geotechnical Report; Fault Activity Map of California; and Preliminary Soil Investigation Report)***

No Impact. The site is located in the Peninsular Ranges Province of California, an area, except for the Perris Block portion, that has pronounced, active, northwest-southeast oriented earthquake fault systems. These include the San Andreas, San Jacinto, Elsinore, and Newport-Inglewood faults. (GTL 2018). Based on review of Figure PS-1 – Regional Fault Zones in the General Plan 2025, Figure 5.6-2 – Faults and Fault Zones, and Appendix E in the FPEIR for the General Plan 2025, no active faults or designated Alquist-Priolo Earthquake Fault Zones are located in the City of Riverside. The nearest earthquake fault to the site is the Glen Ivy section of the Elsinore Fault, located 8.0 miles to the southwest (CGS 2015a). The project site is not located in an area with mapped active or potentially active faults with surface expression and that trend through or are adjacent to the site. Based on the distance of the site to active faults, the potential for fault rupture at the site is low. Therefore, **no impact** related to ground surface rupture would occur directly, indirectly, and cumulatively.

ii. Strong seismic ground shaking?	☐	☐	☒	☐

7aii. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-2 – Faults and Fault Zones and Appendix E – Geotechnical Report; Fault Activity Map of California; Preliminary Soil Investigation Report; RMC Title 16 - Buildings and Construction)***

Less Than Significant Impact. As shown in Figure 5.6-2 – Faults and Fault Zones in the FPEIR for the General Plan 2025, the San Jacinto Fault Zone (located northeast of the City and 12.5 miles northeast of the site) and the Elsinore Fault Zone (located south of the City's Sphere of Influence and 8.0 miles southwest of the site) have the potential for moderate to large earthquakes that would cause intense ground shaking at the site. This ground shaking could lead to structural instability and damage to buildings and infrastructure that are constructed as part of the proposed project.

Project design and construction would have to comply with Part 2 of Title 24 of the California Code of Regulations (California Building Code), as adopted into Title 16 of the RMC (Riverside Building Code). These regulations include building standards for the erection, construction, enlargement, alteration, installation, reconstruction, repair, movement, improvement,

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

connection, conversion, demolition, and use of any building, structure or premises, and grading within the City. In compliance with the California Building Code and Chapter 16.08 of the Riverside Building Code, a Preliminary Soil Investigation Report was prepared to identify geologic and seismic hazards where structural elements and structures would be constructed on the site and to provide geotechnical design parameters, safety factors, and recommendations to be incorporated into the site improvement and building plans. The site class and ground motion and seismic design parameters in the Preliminary Soil Investigation Report would be used in the engineering design and construction of proposed structures and infrastructure.

Consistent with General Plan Objective PS-1 and Policies PS-1.1 and PS-9.8, the proposed project would comply with pertinent provisions of the California Building Code and the Riverside Building Code and would incorporate the recommendations in the Preliminary Soil Investigation Report for the proposed project. Impacts associated with strong seismic ground shaking would be **less than significant** directly, indirectly, and cumulatively.

iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

7aiii. Response: ***(Source: General Plan 2025 Figure PS-2 – Liquefaction Zones; General Plan 2025 FPEIR Figure 5.6-3 – General Liquefaction Zones and Appendix E – Geotechnical Report; CGS Regulatory Maps; and Preliminary Soil Investigation Report)***

Less than Significant Impact. The project site is located in an area with moderate potential for liquefaction, as shown in the General Plan 2025 Figure PS-2 - Liquefaction Zones. The regulatory maps of the California Department of Conservation, California Geological Survey (CGS) do not include the site in an area with earthquake hazards (i.e., fault zones, liquefaction and landslide areas) where geotechnical investigations are required to determine and reduce threats to public health and safety and minimize the loss of life and property (CGS 2015b). The Preliminary Soil Investigation Report states that undocumented fill underlain by older alluvial fan deposits, consisting of silty sand, well-graded sand with silt, and poorly-graded sand, are found on the site. The Preliminary Soil Investigation Report states that with the lack of shallow groundwater and the medium dense to very dense nature of the deeper, older alluvial fan deposits, liquefaction and appreciable seismically-induced settlement is not anticipated at the site (GTL 2018).

Site amplification hazards during seismic shaking are difficult to predict, but the proper design of foundations can substantially improve the proposed structures' resistance to deformation. This may be done by providing adequate lateral connections between all footings with reinforced grade beams and strengthened stem walls, as recommended by the Preliminary Soil Investigation Report (GTL 2018). Incorporation of the recommended structural design measures in the Preliminary Soil Investigation Report, and compliance with the California Building Code and Riverside Building Code regulations would ensure the structural stability of proposed structures and infrastructure. As such, impacts related to seismic-related ground failure, including liquefaction, would be **less than significant** directly, indirectly, and cumulatively.

iv. Landslides?	☐	☐	☐	☒

7aiv. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope; Appendix E – Geotechnical Report; and Geotechnical Report and the Preliminary Soil Investigation Report[included in Appendix E])***

No Impact. The project site and the surrounding area have a generally flat topography. The site slopes to the northwest, with a surface elevation of 856.5 feet above msl along Lincoln Avenue and 848. 8 feet above msl at Van Buren Boulevard. This translates to a slope of about 2 percent across the site. The project site is not located in an area underlain by steep slopes (per Figure 5.6-1 of the General Plan 2025 FPEIR) that are generally prone to landslides.

The general lack of surface relief indicates the site and surrounding area are relatively stable and not subject to landslides. The proposed project would retain the flat topography of the site and would not create or be exposed to landslide hazards. Therefore, there would be **no impact** related to landslides directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

7b. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report; Preliminary Soil Investigation Report [included in Appendix E]; and RMC Title 17 – Grading Code and Title 18 – Subdivision Code)***

Less Than Significant Impact. The site does not contain steep slopes; and Figure 5.6-4 – Soils in the General Plan 2025 FPEIR shows that the site is underlain by Arlington soils, which have slight to moderate erosion potential. The Preliminary Soil Investigation Report indicates rough grading would involve cut and fill of approximately 5 feet, but the site would remain flat, and the project would increase impervious areas on the site. Erosion and loss of topsoil could occur as a result of ground disturbance activities during construction of the proposed project.

The National Pollutant Discharge Elimination System (NPDES) Construction General Permit calls for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for establishing erosion and sediment control Best Management Practices (BMPs) during construction activities (refer to Section 10, Hydrology and Water Quality, of this Initial Study). The proposed project would be subject to the NPDES Construction General Permit and must implement the BMPs in a project-specific SWPPP. This would minimize erosion during short-term construction and impacts would be less than significant.

In the long term, the proposed project would decrease the amount of pervious surface, resulting in less surface area exposed to potential erosion. Soil and pollutants flowing off site (by wind or water erosion) would be reduced by landscaped areas and paved areas. Thus, areas of exposed soils would be minimal following construction of the proposed project, and the potential for erosion would be limited. Additionally, the project site is not intended to be used for agricultural or other purposes that require topsoil. Also, the City's erosion control standards (in Title 18, Subdivisions, of the RMC) and the City's Grading Code (Title 17 of the RMC) require the implementation of measures to minimize soil erosion.

Compliance with NPDES Construction General Permit requirements, as well as with Titles 17 and 18 of the RMC, would ensure that soil erosion or the loss of topsoil would be **less than significant** directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

7c. Response: ***(Source: General Plan 2025 Figure PS-2 – Liquefaction Zones; General Plan 2025 FPEIR Figure 5.6-5 – 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; RMC Title 16 – Buildings and Construction, Title 18 – Subdivision Code and Title 17 – Grading Code; and Preliminary Soil Investigation Report [included in Appendix E])***

Less Than Significant Impact. The general topography of the site and surrounding area is flat. The soils on the site consist of undocumented fill on the upper 4 feet, underlain by older alluvial fan deposits (consisting of silty sand, well-graded sand with silt, and poorly-graded sand) starting at 4 to 6 feet below the surface. These soils are considered highly susceptible to caving. These soils are also subject to sloughing and collapse. These soils have negligible sulfate exposure risk and have a low potential for significant hydroconsolidation (GTL 2018). The Preliminary Soil Investigation Report included testing of the on-site soils and provides recommendations to prevent unstable soil conditions and geologic hazards from project development, as appropriate:

- **Landslides:** The site and surrounding areas are flat and have no potential for landslides. See response under Threshold 7a(iv).
- **Lateral spreading:** As the liquefaction potential at the site is low, the risk of earthquake-induced lateral displacement at the site is very low (GTL 2018).
- **Subsidence:** The site is not located in an area of known subsidence associated with petroleum or groundwater extraction (GTL 2018).
- **Liquefaction:** The potential for liquefaction at the site is low. See response under Threshold 7a(iii).
- **Collapse:** The proposed project would retain the flat topography of the site. Adherence to the City's grading and building requirements (Titles 16 and 17 of the RMC) and the recommendations in the Preliminary Soil Investigation Report would ensure that grading and excavation activities are not subject to soil caving, sloughing and collapse and the site is adequately graded and prepared to prevent the collapse of graded pads and/or slopes.

Compliance with the City's Building Code (Title 16 of the RMC) and the recommendations of the Preliminary Soil Investigation Report for the proposed project would ensure that impacts related to on-site soil and geologic conditions are **less than significant** directly, indirectly, and cumulatively.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒

7d. Response: ***(Source: General Plan 2025 Figure PS-3 - Soils with High Shrink-Swell Potential; General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Report; RMC Title 16 - Buildings and Construction and Title 18 – Subdivisions; and Preliminary Soil Investigation Report [included in Appendix E)***

No Impact. Expansive soil is defined under California Building Code based on the soil's potential to shrink or swell. Figure PS-3 of the Public Safety Element of the General Plan and Figure 5.6-5 in the General Plan 2025 FPEIR do not identify the site as having high shrink-swell potential; and Figure 5.6-4 shows that the site is underlain by Arlington soils, which have low to moderate potential for soil expansion.

The Preliminary Soil Investigation Report for the proposed project indicates that the upper foundation soils are very sandy and considered to have very low expansion potential (GTL 2018). Thus, the proposed project would not be exposed to

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
geologic hazards associated with soil expansion. Compliance with the recommendations of the Preliminary Soil Investigation Report and applicable provisions of the City's Building Code and Subdivision Code (Titles 16 and 18 of the RMC) and the California Building Code would ensure that **no impact** related to soil expansion would occur directly, indirectly and cumulatively, such that would result in risk to life or property.				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

7e. Response: ***(Source: Project Conceptual Grading Plan)***

No Impact. The project site is served by the public sewer system, with an existing 8-inch sewer line on Van Buren Boulevard and Lincoln Avenue. The proposed project would include two connections to the sewer line on Van Buren Boulevard from the proposed buildings on site. The proposed project would not utilize on-site septic tanks or alternative wastewater disposal systems. Thus, it would have **no impact** related to septic tanks or alternative waste water disposal systems directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

7f. Response: ***(Source: General Plan 2025 Policy HP-1.3 and Cultural Resource Literature Review prepared by Psomas in May 2018 [included in Appendix C])***

Less Than Significant Impact with Mitigation Incorporated. The Los Angeles County Museum of Natural History (LACM) conducted a record search for paleontological resources in the project area in March 2018. The project area was determined to have surface deposits consisting of older Quaternary Alluvium, which typically do not contain significant vertebrate fossils in the very uppermost layers. Thus, surface grading or very shallow excavations in the older Quaternary deposits would not likely uncover significant fossil vertebrate remains.

However, surface deposits may be underlain by older sedimentary deposits that do contain significant vertebrate fossils. A fossil specimen of whipsnake and a fossil specimen of deer have been found northwest and west-southwest of the site at a depth of 9 to 11 feet below the surface. Thus, the project site is considered moderately sensitive for paleontological resources. As indicated above, deeper excavations needed for infrastructure improvements are expected to disturb native soils. Therefore, there is a potential that ground-disturbing activities within native sediments could uncover previously unidentified paleontological resources. Implementation of MM CUL-2 in Section 5, Cultural Resources, which requires a pre-grade conference/cultural sensitivity training to inform construction personnel of the potential for encountering unique paleontological resources, and MM GEO-1, which requires the Paleontologist to evaluate unanticipated paleontological discoveries, would reduce potential impacts to paleontological resources directly, indirectly, and cumulatively as a result of the proposed project to less than significant after mitigation.

MM GEO-1 In the event that any paleontological resources (e.g., plant or animal fossils) are encountered before or during grading, the Property Owner/Developer shall retain a qualified Paleontologist to evaluate unanticipated discoveries and to take appropriate measures to protect or preserve them for study. The Paleontologist shall submit a report of findings that will also provide specific recommendations regarding further mitigation measures (i.e., paleontological monitoring) that may be appropriate. Where mitigation monitoring is appropriate, the program must include, but not be limited to, the following measures:

- Assign a Paleontological Monitor, trained and equipped to allow the rapid removal of fossils with minimal construction delay, to the site full time during earth-disturbing activities.
- Divert earth-disturbing activities away from the immediate area of the discovery until the Paleontological Monitor has completed salvage. If construction personnel make the discovery, the Grading Contractor shall immediately divert construction and notify the Paleontological Monitor of the find.
- Prepare, identify, and curate all recovered fossils for documentation in the summary report and transfer to an appropriate repository (e.g., Western Science Center of Riverside County).
- Prepare and submit a technical report describing the identification, salvage, evaluation, and treatment of all fossils discovered during grading to the City of Riverside. Transfer collected specimens with a copy of the report to the depository.

With the implementation of MM CUL-2 and MM GEO-1, the proposed project is consistent with General Plan Policy HP-1.3. Impacts to paleontological resources directly, indirectly, and cumulatively as a result of the proposed project would be reduced to a **less than significant level with mitigation**.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

8a. Response: ***(Source: CalEEMod and GHG Emissions Analysis prepared by Psomas in May 2018 [included in Appendix F])***

Less Than Significant Impact. A Greenhouse Gas Emissions (GHG) Emissions Analysis was prepared for the proposed project (refer to Appendix F of this Initial Study) and is summarized herein. Climate change refers to any significant change in measures of climate (e.g., average temperature, precipitation, or wind patterns) over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, which is attributed to an accumulation of GHG emissions in the atmosphere and, in turn, increases the Earth's surface temperature. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through fossil fuel combustion in conjunction with other human activities appears to be closely associated with global warming.

GHGs are global pollutants and are therefore unlike criteria air pollutants such as O_3, particulate matter (PM10 and PM2.5), and TACs, which are pollutants of regional and local concern (refer to Section 3, Air Quality, of this Initial Study). While pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes, ranging from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe. Therefore, GHG effects are global, as opposed to the local and/or regional air quality effects of criteria air pollutant and TAC emissions.

GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). GHGs vary widely in the power of their climatic effects; therefore, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. Carbon dioxide equivalent (CO_2e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO_2e.

The project site is part of an existing commercial plant nursery, and GHG emissions are generated at the project site by vehicles travelling to and from the site, on-site use of small equipment and utility vehicles (e.g., loaders), waste disposal, and electrical power and water consumption. Additionally, the trees and growing plants at the nursery provide sequestration of CO_2.

Construction of the project would involve the use and operation of construction equipment and vehicle trips for construction workers, building materials, and construction debris, which, in turn, would lead to the combustion of fossil fuels and associated generation of GHGs. In the long term, project-generated vehicle trips, the production and on-site use of electricity, natural gas, and water, and solid waste collection and disposal during project operations would also generate GHGs.

GHG emissions from the proposed project's construction and operations phases were calculated by using the California Emission Estimator Model (CalEEMod) version 2016.3.2 computer program. CalEEMod is designed to model construction and operational emissions for land use development projects and allows for the input of project- and County-specific information. Construction of the project is modeled to begin in Spring 2020 and occur for 8 months, with operations starting in 2020. The CalEEMod input for construction emissions was based on the project's construction data and default assumptions from CalEEMod. The input for operational emissions was based on the vehicle trip generation rates provided in the Traffic Impact Analysis and the proposed building area. Additional input details are included in Attachment A of Appendix F of this Initial Study. For GHG emissions calculations, emissions associated with electricity, water use, and waste disposal are included. The estimated construction and operational GHG emissions for the proposed project are shown in Tables 8 and 9, respectively.

Because impacts from construction activities would occur over a relatively short period of time (8 months), they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, measures to reduce GHG emissions from construction equipment are relatively limited. The SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime and added to the operations phase emissions. As shown in Table 6, the 30-year amortized construction emissions would be 8 $MTCO_2e$ per year.

TABLE 8
CONSTRUCTION-RELATED
GREENHOUSE GAS EMISSIONS

Construction-Period Emissions	Annual $MTCO_2e$
Total Construction-Period Emissions	**234**
Amortized construction-period Emissions*	8
$MTCO_2e$: metric tons of carbon dioxide equivalent * Total amortized over 30 years	

The SCAQMD has developed "Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans" to assess potential GHG impacts attributable to new land use development projects. At Tier 1 of the proposed approach, GHG emissions impacts would be less than significant if a project qualifies under a categorical or statutory CEQA exemption. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impact would be less than significant if a project is consistent with a previously adopted GHG-Reduction Plan that meets specific requirements. At Tier 3, the Working Group proposes a 3,000 $MTCO_2e$ per year screening threshold for residential, commercial, and mixed-use projects. A project with emissions greater than the screening threshold would have to demonstrate achievement of performance standards (Tier 4) and/or provide mitigation offsets. The Tier 3 analysis, the 3,000 MTCO2e per year screening threshold, is used in the analysis in this Initial Study.

As shown in Table 9, with consideration of amortized construction emissions, the total annual estimated GHG emissions for the proposed project are 1,815 $MTCO_2e$ per year. This value is less than the proposed SCAQMD Tier 3 screening threshold of 3,000 $MTCO_2e$ per year. These estimates also do not account for a reduction in GHG emissions associated with compliance with the 2016 Energy Efficiency Standards and the California Green Building Standards Code (CalGreen Code); GHG reductions that would occur due to the displacement of a portion of the plant nursery; and the project's location near existing residences, which could facilitate the use of alternative forms of transportation, such as walking or bicycling.

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

TABLE 9
PROJECT-RELATED GREENHOUSE GAS EMISSIONS

Operational Emissions Source	Annual $MTCO_2e$
Area	<1
Energy	158
Mobile	1,626
Waste	11
Water	12
*Total Operational Emissions**	*1,807*
Amortized Construction Emissions (Table 6)	8
Total Project Emissions	***1,815***
SCAQMD Tier 3 Screening Threshold	**3,000**
Exceed Threshold?	**No**

$MTCO_2e$: metric tons of carbon dioxide equivalent; SCAQMD: South Coast Air Quality Management District.

* Totals may not add due to rounding.

Source: SCAQMD 2008 (threshold).

CalEEMod output worksheets are provided in Attachment A in Appendix F of this Initial Study.

It is unlikely that one individual development project would have GHG emissions of a magnitude that would directly impact global climate change; therefore, any impact would be considered on a cumulative basis. Because the proposed project's GHG emissions would be less than the 3,000 $MTCO_2e$ per year significance threshold, the GHG emissions are not considered to be cumulatively considerable. Thus, a **less than significant impact** would occur directly, indirectly, or cumulatively with the proposed project.

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

8b. Response: (*Source: Riverside Economic Prosperity Action Plan and Climate Action Plan and GHG Emissions Analysis prepared by Psomas in May 2018 [included in Appendix F])*

Less than Significant Impact. The SCAQMD and the City of Riverside have adopted measures for the purpose of reducing GHG emissions. As further described in the Greenhouse Gas Emissions Analysis prepared for the proposed project and included in Appendix F of this Initial Study (Psomas 2018d), several State policies and standards have been adopted for the purpose of reducing GHG emissions that are applicable to the proposed project. In summary, Executive Order (EO) S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Assembly Bill (AB) 32 (the California Global Warming Solutions Act of 2006) establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions and codified the GHG reduction goals of EO S-3-05. Senate Bill (SB) 375 (Sustainable Communities and Climate Protection Act) established a process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 required SCAG to incorporate a "Sustainable Communities Strategy" (SCS) into its regional transportation plans (RTPs). SCAG's 2016–2040 RTP/SCS includes goals and policies to reduce vehicle miles traveled (VMT) and focuses on transportation and land use planning that includes building infill projects, locating residents closer to where they work and play, and designing communities to have access to high quality transit service.

EO B-30-15 orders "A new interim Statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse

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

gas emissions to 80 percent below 1990 levels by 2050. SB 350 (Clean Energy and Pollution Reduction Act) implements EO B-30-15 by increasing the procurement target for electricity from renewable sources from 33 percent to 50 percent and doubling the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. SB 32 codified the GHG reduction goals of EO B-30-15, requiring the State to reduce GHG emissions by 40 percent below 1990 levels by 2030. This goal is expected to keep the State on track to meet the goal set by EO S-3-05 of reducing GHG emissions by 80 percent below 1990 levels by 2050. AB 197 was signed at the same time as SB 32 to ensure that the SB 32 goals are met. Additional discussion of these policies and standards is provided in the GHG Emissions Analysis in Appendix F of this Initial Study.

Statewide plans and regulations (such as GHG emissions standards for vehicles, the Low Carbon Fuel Standard, Cap-and-Trade, and renewable energy) are being implemented at the Statewide level, and compliance at the individual development project level is assumed through mandatory project compliance with State laws. State regulations, plans, and policies adopted for the purpose of reducing GHG emissions that are directly applicable to the proposed project include the California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the CalGreen Code, which require the implementation of trip reduction, alternative fuel vehicles, energy and water conservation, and solid waste reduction and diversion measures that would reduce GHG emissions. The proposed project would be developed in compliance with the requirements of these regulations as a standard condition during the Plan Check process, consistent with General Plan Objective OS-8 and Policies OS-8.2, OS-8.6, PS-6.3, and PS-6.4.

The City adopted the Riverside Restorative Growthprint (RRG) Economic Prosperity Action Plan (EPAP) and Climate Action Plan (CAP) in 2016. The RRG-CAP establishes reduction targets for future years (2020 and 2035), which include a 15-percent community-wide emissions target reduction for 2020, from the City's 2010 emissions inventory. This reduction target for 2020 is consistent with the AB 32 goal of emission reductions to 1990 levels. The 2035 community-wide reduction target is set to 49 percent below the 2007 baseline, which would be consistent with the AB 32 goal and EO S-3-05, which has set a goal for 80 percent below 1990 levels by 2050 (using a straight-line interpolation). The municipal operation reduction targets are set for a 15-percent reduction from the City's 2007 baseline emissions for 2020 and a 49 percent reduction from the City's 2007 baseline emissions for 2035. The strategies in the City's RRG-EPAP include place-making, smart growth and infrastructure, and connected community, which are supported by the proposed project. Specifically, the proposed commercial uses would serve the adjacent residential communities by providing a nearby food establishment and gasoline station that could be used as part of a passby trip, rather than a separate trip to a more distant location. The project would also help create a stronger identity for Lincoln Plaza area by encouraging nearby residents to easily walk or bike to the site and nearby commercial uses.

The strategies for policy lens and future leaders in the RRG-CAP are directed at City actions and do not relate to the proposed project. The measures in the RRG-CAP identify State regulations and regional programs (e.g., efficiency standards for passenger vehicles, carbon content of transportation fuels, and minimum renewable energy supply requirements for utilities) that are currently being implemented by various agencies and do not directly impose regulations or standards for a specific development. These State and regional measures would also result in GHG emission reductions in the City of Riverside without any additional action by the City or the Developer. Other State and regional programs require implementation by the City (e.g., CalGreen Code, water efficient landscape requirements, and water conservation programs) and are implemented as part of the City's permitting processes or through current incentive programs. In addition, the RRG-CAP identifies local measures that the City of Riverside is currently implementing or has committed to implementing to further reduce GHG emissions.

Most of the State and regional measures do not directly relate to the proposed project, but those relevant to the proposed project include the following:

- **Measure SR-2 2013, California Building Energy Efficiency Standards (Title 24, Part 6)**. Mandatory energy efficiency standards for buildings.

  The proposed project would comply with the latest 2016 California Building Energy Efficiency Standards.

- **Measure SR-12, Electric Vehicle Plan and Infrastructure.** Facilitate electric vehicle use by providing necessary infrastructure.

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

The proposed project would include pre-wired electric vehicle charging parking spaces, as required by the CalGreen Code.

- **Measure SR-13, Construction and Demolition Waste Diversion.** Meet mandatory requirement to divert 50 percent of construction and demolition (C&D) waste from landfills by 2020 and exceed requirement by diverting 90 percent of C&D waste from landfills by 2035.

  The proposed project would divert C&D waste by 65 percent, as required by the CalGreen Code. Under this regulation, the contractor would implement a Construction Waste Management Plan that would recycle and/or salvage at least 65 percent of the estimated volume or weight of all nonhazardous construction and demolition wastes, as verified by the City during plan check and site inspections during construction.

The subregional and local measures in the CAP are mainly City programs organized under four policy goals: Energy, Transportation and Land Use, Water, and Solid Waste. Those relevant to the proposed project include the following:

- **Measure T-1. Bicycle Infrastructure Improvements.** Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.

  The widening of Van Buren Boulevard and Lincoln Avenue would allow for the future striping of these road segments for a Class 2 bike lane, as shown in Figure LU-6 – Tying the Connections of the General Plan and Figure 6-1 in the Bicycle Master Plan Update: Addendum.

- **Measure T-2, Bicycle Parking.** Provide additional options for bicycle parking.

  The proposed project would provide bicycle racks near the convenience store.

- **Measure T-3, End of Trip Facilities.** Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters.

  Bus service in the project area is provided through the Riverside Transit Agency's Route 10 and Route 27, which run along Van Buren Boulevard and Lincoln Avenue and with a bus stop east of the site beside Lincoln Plaza. The proposed project would provide sidewalks and restripe crosswalks on Van Buren Boulevard and Lincoln Avenue to facilitate pedestrian crossing from nearby residential areas to the bus stop by Lincoln Plaza.

- **Measure T-4, Promotional Transportation Demand Management.** Encourage transportation demand management strategies.

  The proposed project would provide sidewalks to encourage area residents to walk, bike, or use public transit to conveniently reach places of employment, goods and services, entertainment, and schools, which, in turn, would reduce vehicle trips and associated GHG emissions.

- **Measure T-6, Density**. Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.

  The proposed project would provide employment opportunities at a site near existing employment-generating uses including Lincoln Plaza and adjacent commercial uses, with nearby residential areas and an adjacent parcel that is planned for high-density residential uses.

- **Measure T-7, Mixed Use Development.** Provide for a variety of development types and uses.

  The proposed project would divide a single parcel into three lots, with two lots proposed for commercial development by the project and the third lot planned for future high-density residential development.

- **Measure T-8, Pedestrian Only Area**. Encourage walking by providing pedestrian-only community areas.

  The project would provide sidewalks on Van Buren Boulevard and Lincoln Avenue where no sidewalks currently exist.

- **Measure T-11, Voluntary Transportation Demand Management**. Encourage employers to create TDM programs for their employees.

  The project would provide have staggered work shifts that do not start or end during peak hour traffic periods due to the type of land uses proposed.

- **Measure T-12, Accelerated Bike Plan Implementation**. Accelerate the implementation of all or specific components of a jurisdiction's adopted bike plan.

  The project would include the widening of Van Buren Boulevard and Lincoln Avenue and would facilitate the future striping of these road segments to accommodate a Class 2 bike lane.

- **Measure T-19, Alternative Fuel and Vehicle Technology and Infrastructure.** Promote the use of alternative-fueled vehicles, such as those powered by electric, natural gas biodiesel, and fuel cells, by Riverside residents and workers.

  The project would provide pre-wired electric vehicle charging parking spaces, as required by the CalGreen Code.

- **Measure W-1, Water Conservation and Efficiency**. Reduce per capita water use by 20 percent by 2020.

  The proposed project would implement water conservation measures, as required by the CalGreen Code and City ordinances (e.g., Water Efficient Landscape Ordinance (Municipal Code Chapter 19.570) and Water Conservation Ordinance (Municipal Code Chapter 14.22). The City's Urban Water Management Plan outlines the programs that the City is implementing to achieve the 20 percent reduction by 2020. Project compliance with City regulations and participation in City conservation programs, which include future increases in the use of recycled water and continued implementation of water conservation measures, would allow the City to maintain a per capita water use that meets its water conservation goals.

- **Measure SW-1, Yard Waste Collection**. Provide green waste collection bins community-wide.

  Landscape maintenance at the proposed project would be provided by a landscape contractor, which would facilitate green waste collection and disposal separate from on-site commercial wastes.

- **Measure SW-2, Food Scrap and Compostable Paper Diversion**. Divert food and paper waste from landfills by implementing commercial and residential collection programs.

  The proposed project would provide recycling bins for commercial uses, in accordance with Chapter 19.554 of the RMC.

The RRG-CAP projects that implementation of the State, regional, and local measures would allow the City to meet its 2020 GHG reduction target but would fall short of its 2035 target. The RRG-CAP expects that State programs and regulations related to new technologies and market development would be expanded in the future to reach the long-term 2035 GHG reduction targets. Additional programs and regulations are also needed and are expected to focus on City efforts towards the following:

-
- Low-carbon fuels and vehicles (e.g., biofuels, electric vehicles)
- Low-carbon electricity (e.g., renewables)
- Energy efficiency

City programs would include a higher renewables portfolio standard for the Riverside Public Utilities (RPU), more stringent energy efficiency standards and incentives, and land use changes to promote compact development at higher intensities, mixed-use developments, and transit-oriented developments. The combination of future State, regional, and local efforts would allow the City to meet its 2035 GHG reduction target.

While the project was not considered in the growth projections for the City that were used in the 2016–2040 RTP/SCS and GHG projections under the business-as-usual scenario in the RRG-CAP, the project would result in a minimal increase in

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

employment with no increase in the number of residents in the City. Also, the project would develop commercial/retail uses to support the existing local residential uses that would realize GHG emissions reductions through reduced vehicle use. Therefore, the project would be consistent with the overall goal of reducing vehicular trips by redeveloping the plant nursery with the proposed commercial/retail uses near existing and the planned residential uses.

Thus, the proposed project supports the goals and policies of the City's RRG-EPAP/CAP and SCAG's 2016–2040 RTP/SCS, thereby also supporting SB 375, AB 32, and SB 32 goals. The project would not conflict with any State plans, policies, or regulations adopted for the purpose of reducing GHG emissions. The impact associated with the generation of GHG emissions from the proposed project would be **less than significant** directly, indirectly, and cumulatively.

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

9a. Response: ***(Source: General Plan 2025 Public Safety Element; GP 2025 FPEIR Section 5.7 Hazards and Hazardous Materials; and RMC Chapter 9.48 – Unified Hazardous Materials Programs and Section 19.590.030 - Hazardous and Toxic Materials)***

Less Than Significant Impact. The Public Safety Element of the General Plan 2025 and Section 5.7 of the FPEIR for the General Plan 2025 generally discusses hazards to the environment or the public through the transport, use, or disposal of hazardous materials that are typically associated with the operation of non-residential uses, such as industrial and some commercial uses that use hazardous materials in large quantities. The site is not included in the lists of hazardous material facilities or hazardous waste sites in the City, as provided in the FPEIR of the General Plan 2025.

Demolition and construction activities for the proposed project would be short-term and phased over approximately 8 months; and the transport, use, and disposal of hazardous materials as part of these activities would be temporary. Hazardous materials that are currently present on the site (e.g., diesel generator, pesticides container, pre-packaged insecticides, fungicides, herbicides, nutrients, household solvents, cleaning materials, and loaders) would have to be disposed off-site. Construction activities will also utilize hazardous materials, such as fuels, lubricating oils, solvents, antifreeze, hydraulic fluid, and compressed gases. The construction contractor would have to comply with existing regulations regarding hazardous material use, storage, disposal, and transport to preclude any major threats to public health and safety. These regulations include, but are not limited to, the Toxic Substances Control Act, Hazardous Material Transportation Act, Resource Conservation and Recovery Act, California Hazardous Waste Control Act, California Accidental Release Prevention Program, the City's hazardous materials programs in Chapter 9.48 of the RMC, and the Performance Standards for hazardous and toxic materials in Section 19.590.030 of the RMC.

Consistent with existing commercial developments in the vicinity of the project site, once constructed, the proposed restaurant and convenience store would use hazardous materials for maintenance activities. In addition, the proposed gas station would store, handle, dispense, and transport gasoline and diesel fuel during long-term operations. The project will have two underground storage tanks (USTs) installed for motor vehicle fuel adjacent to the six fueling positions: one for unleaded "regular" fuel, and the other a tank split between two fuel products capacity for diesel, and for unleaded "premium" fuel). The USTs would likely consist of double-walled, fiberglass fuel storage tanks with leak detection sensors, Healy clean air separator (located near the convenience store), automatic shut off valves, and other safety measures. Various federal, State, and local regulations are in place to prevent public safety hazards from improper use, handling, storage, transport, and disposal of hazardous materials, such as gasoline and diesel fuels. In addition, Chapter 9.48 of the RMC sets regulations for the City's hazardous materials programs; and Section 19.590.030 establishes performance standards for hazardous and toxic materials. The California Fire Code, as adopted by the City, also includes regulations for the storage of flammable and combustible liquids and other toxic materials. The Hazardous Materials Transportation Act is implemented by Caltrans on State highways. The County of Riverside Department of Environmental Health's Hazardous Materials Branch (HMB) is responsible for permitting and inspection of underground storage of hazardous substances under the Unified Program of the California (CAL) Environmental Protection Agency (EPA). The Unified Program is the consolidation of six state-regulated

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

environmental programs into one program under CAL-EPA. The County's HMB has been the Certified Unified Program Agency (CUPA) since 1996. As the CUPA, the HMB is responsible for the implementation of the six environmental programs for Riverside County, including underground storage of hazardous substances. The Riverside Fire Department participates with the HMB in administering the CUPA Program with the City of Riverside. The project would need to obtain permits and approvals from responsible agencies for the use, storage, handling, transport, and disposal of hazardous materials. Compliance with pertinent regulations and the permit conditions would prevent the creation of a significant hazard to the public or the environment due to a fire, explosion, or accidental spill.

The routine inspection of the gas stations' USTs, and all associated fuel delivery infrastructure, along with the continued mandated compliance with all federal, State, and local regulations during project construction and operation would ensure that the proposed gas station is operated in a non-hazardous manner and would substantially reduce potential risks from hazardous materials to the public and the environment. Therefore, the proposed project would not pose a significant threat to the public related to on-site hazardous material use, sale, storage, transport and disposal, with project compliance with existing regulations. As such, impacts related to the transport, use, or disposal of any hazardous material would be **less than significant** directly, indirectly and cumulatively.

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

9b. Response: ***(Source: GP 2025 FPEIR Tables 5.7 A – D; RMC Chapter 9.48 – Unified Hazardous Materials Programs and Section 19.590.030 – Hazardous and Toxic Materials; Phase I and Phase II Environmental Site Assessment (ESA) [included in Appendix G]; National Pipeline Mapping System; and Southern California Gas' (SCG) Natural Gas Pipeline Map)***

Less Than Significant Impact. The site is not included in the lists of hazardous material facilities in the City, as provided in the FPEIR of the General Plan 2025. Additionally, no hazardous material pipelines are located on or near the site. Based on review of the Pipeline and Hazardous Material Safety Administration (PHMSA) National Pipeline Mapping System and SCG Natural Gas Pipeline Map, the nearest transmission pipeline is a natural gas pipeline owned by the Southern California Gas Company (SCG) generally running east-west approximately 0.9 mile south of the site. The nearest SCG high-pressure distribution line runs along Cleveland Avenue, approximately 0.5 mile southeast of the site. The project would not affect SCG's transmission and high-pressure distribution lines.

A Phase I and Phase II ESA was prepared for the entire plant nursery property the findings of the report are summarized. Historic aerial photographs and topographic maps dating back to 1901 indicate the site was undeveloped from 1901 to 1953, when it then became part of an orchard/agricultural land until 1975. In 1975, the site appears as graded vacant land (possibly a strawberry field, listed as Manassero Farms from 2001 to 2005). In 2005, the site was used as a plant nursery. Residual concentrations of pesticides and heavy metals that typically accompany herbicide application (i.e., arsenic and lead) are often present in shallow soil at sites historically used for agricultural purposes (Stantec 2017).

A shallow soil assessment was conducted as part of the Phase I and Phase II ESA to determine if organochlorine pesticides or heavy metals are present at concentrations exceeding applicable regulatory thresholds. The results of the soil assessment indicated that organochloride pesticides are present at levels above laboratory reporting limits but at concentrations well below the USEPA Regional Screening Levels for Residential Soil and below the California hazardous waste levels for disposal. The potential for vapor intrusion at the site from adjacent land uses is also considered low. The soils impacted by total petroleum hydrocarbons (TPH) at the western edge of the plant nursery (west of the site) did not contain detectable levels of volatile organic compounds (VOC); thus, the potential that a soil vapor issue would be present is low (Stantec 2017). The levels of arsenic and lead were found to be within naturally occurring background levels and below regulatory action levels for residential use (Stantec 2017). Thus, pesticides and metals in the soil are not considered a recognized environmental condition by the Phase I and Phase II ESA and would not pose hazards to future users of the site. Impacts related to pesticides and heavy metal residues in the soil would be less than significant.

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

The plant nursery currently uses hazardous materials for operations and maintenance activities. A diesel generator and pesticides container are present near the storage sheds. Several pre-packaged insecticides, fungicides, herbicides, nutrients, and a fertilizer tank, as well as household solvents and cleaning materials, are also present in this area. Utility vehicles used on-site (e.g., loaders) are maintained at the asphalt parking lot, but waste oil is disposed off-site. Near the western boundary of the plant nursery are two 55-gallon diesel drums and portable diesel and gasoline containers, a pump, and a diesel exhaust fluid container near the portable storage unit that is indicative of a fuel transfer station. Soil staining and hydrocarbon odors were observed in this area, and soil testing was conducted by Stantec to determine the level and extent of contamination. The testing indicated no to low concentrations of VOC and TPH as gasoline in the samples. However, the concentration of TPH as diesel at one location was above the USEPA Regional Screening Level for Residential Soil, which are more stringent that the Screening Level for Commercial/Industrial Soil. The impacted area extends 10 feet in all directions from the boring location and up to 5 feet below the ground surface. It is estimated that approximately 75 cubic yards of impacted soil would have to be removed and disposed of at an appropriate facility (Stantec 2017). This impacted area is located on the plant nursery site but is not located on the project site for the proposed commercial development. Thus, it would not impact the proposed project; and the soil removal would not be required as part of the project.

The structures on the site were constructed in the late 1990s or early 2000s. Thus, the presence of lead-based paint is considered unlikely; and further investigation of indoor radon issues does not appear to be warranted. Additionally, since the buildings that may contain these materials would be removed from the property, no further assessments of lead-based paint or asbestos are recommended. Therefore, impacts would be less than significant, and no mitigation is required.

As discussed under Threshold 9a above, the proposed project would utilize hazardous materials during construction and operational activities. The proposed project would eliminate hazardous materials use by the plant nursery and instead replace it with the transport, storage, and sale of gasoline and diesel fuels for the gas station and use of various hazardous materials for restaurant and convenience store property maintenance. The gas pumps and underground storage tanks would be built and operated in compliance with pertinent regulations as implemented by the Riverside Fire Department and other agencies. These regulations require the provision of vapor control, corrosion protection, overfill prevention, spill prevention, and release detection features and systems, as well as corrective action for leaks, consistent with General Plan Policy PF-1.7. Compliance with existing regulations regarding hazardous material use, storage, disposal, and transport, including Chapter 9.48 and Section 19.590.030 of the RMC, would preclude any major threats to public health and safety due to upset or accident conditions.

Since hazardous material use by the restaurant, gas station and convenience store would be conducted in compliance with applicable federal, State, and local laws and regulations pertaining to the transport, use and sale, disposal, handling, and storage of hazardous materials and hazardous waste, impacts associated with potential upset and accident conditions involving the release of hazardous materials into the environment would be **less than significant** directly, indirectly, and cumulatively.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

9c. Response: ***(Source: General Plan 2025 Public Safety and Education Elements, Figure 5.13-2 – Riverside Unified School District (RUSD) Boundaries, and Table 5.13-D RUSD Schools)***

No Impact. There are no schools within 0.25 mile of the site. Harrison Elementary School, at 2901 Harrison Street, is located approximately 0.5 mile southwest of the site. Arlington High School, at 2951 Jackson Street, is located approximately 0.5-mile northeast of the site on Lincoln Avenue and Jackson Street. Hawthorne Elementary School, at 2700 Irving Street (the old Hawthorne campus on Indiana Avenue is longer in use), is located approximately 0.7-mile northeast of the site. All other schools are located farther from the project site. The proposed project includes a gas station that would emit fuel vapors (refer to the discussion provided in Thresholds 3e and 9a above). These emissions would not affect students at the Harrison, Hawthorne, and Arlington schools, as the gasoline odors and vapors during filling and fueling activities would dissipate rapidly from the source (i.e., gas pumps and underground storage tank) with an increase in distance. The use, storage, and transport of hazardous materials at the site would also be made in compliance with the applicable federal, State, and local

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
laws and regulations. Therefore, the proposed project would have **no impact** regarding emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school directly, indirectly, and cumulatively.				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

9d. Response: ***(Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites; General Plan 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; Phase 1 and Phase II Environmental Site Assessment; and DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese)***

No Impact. Figure PS-5 – Hazardous Waste Sites in the General Plan 2025 does not identify the site as a hazardous waste site. Section 5.7 of the General Plan FPEIR also does not include the site in the lists of Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), Toxics Release Inventory (TRI), Department of Toxic Substances Control (DTSC) Envirostor, and California Accidental Release Prevention (CalARP) Risk Management Program (RMP) facilities.

Further, based on a current review of available data, the project site is not included in the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Specifically, the project site is not listed on the California Department of Toxic Substances Control's (DTSC's) Envirostor Hazardous Waste and Substances Site List (Cortese). The site is also not included in the list of Leaking Underground Storage Tank (LUST) sites and the list of sites identified with waste constituents above hazardous waste levels outside the waste management unit. The nearest hazardous waste users are commercial businesses along Van Buren Boulevard, which include Albertsons, Rite Aid, Crystal Cleaners, and Advanced Aircraft Seal. Considering the locations and distances of these uses and other hazardous material users and hazardous waste generators from the project site and/or their regulatory status, the sites listed in government databases do not constitute a potential recognized environmental condition for the project.

Thus, the proposed project would have **no impact** related to creating a significant hazard to the public or environment directly, indirectly, and cumulatively.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒

9e. Response: ***(Source: General Plan 2025 Figures PS-6A and PS-6B– Airport Land Use Compatibility Zones and Influence Areas; Riverside County Airport Land Use Compatibility Plan (RCALUCP); and AirNav Riverside Municipal Airport)***

No Impact. Figures PS-6A and PS-6B of the General Plan 2025 show the site is located outside the airport land use compatibility zones and influence areas for the Flabob Airport, Riverside Municipal Airport, and March Air Reserve Base. The nearest airport to the site is the Riverside Municipal Airport, which is a City-owned airport located approximately 2.8 miles north of the project site. This airport has four runways and has 195 aircraft (i.e., airplanes and helicopters) based on the field. It had an average of 288 operations per day in 2016. The Riverside County Airport Land Use Compatibility Plan (RCALUCP) shows that the site is outside the Compatibility Factors Map for the Riverside Municipal Airport. Therefore, the proposed project would not expose residents or employees in the project area to aircraft hazards or excessive noise and would not adversely affect aircraft or airport operations at the Riverside Municipal Airport.

No impacts related to hazards from airports would occur with the project directly, indirectly, and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

9f. Response: ***(Source: Site Visit; General Plan 2025 Figure PS 8.1 - Evacuation Routes; General Plan 2025 FPEIR Chapter 5.7 – Hazards and Hazardous Materials; City of Riverside Emergency Operations Plan (EOP); City of Riverside-Annex Local Hazard Mitigation Plan (LHMP); Fire Department Strategic Plan; and Standard Drawings for Construction)***

Less Than Significant Impact. The proposed project would be served by existing streets abutting the site (Van Buren Boulevard and Lincoln Avenue), as well as a network of nearby local streets and the SR-91 freeway to the north. The local streets have been designed to meet the Riverside Public Works and Fire Departments' specifications for emergency vehicle access. The roadway widening and associated improvements proposed on Van Buren Boulevard and Lincoln Avenue have also been designed to comply with City standards.

Emergency evacuation in the City would be conducted under the supervision of the City's Police Department, Fire Department, and/or the California Office of Emergency Services in accordance with the City's Emergency Operations Plan (EOP), Local Hazard Mitigation Plan (LHMP), and Fire Department Strategic Plan, which address the City's planned responses to emergencies and hazards, including those involving hazardous materials. Van Buren Boulevard is a designated evacuation route in the City, as shown in Figure PS-8.1 in the Public Safety Element of the General Plan. Widening of Van Buren Boulevard as part of the project would improve emergency evacuation along this road.

As part of project construction, temporary street lane closures would be necessary for utility connections and roadway improvements along Van Buren Boulevard and Lincoln Avenue. The street closures would be of short duration so as not to interfere or impede with any emergency response or evacuation in the surrounding areas, and at least one lane of travel would be maintained in each direction at all times. Temporary and partial street closures would comply with the Standard Specifications for Public Works Construction (Greenbook) (as amended and adopted by the City), which contains standards for maintenance of access; traffic control; and notification of emergency personnel. Therefore, the proposed project would have a **less than significant impact** directly, indirectly, and cumulatively to an emergency response or evacuation plan.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

9g. Response: ***(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas and CalFire Very High Fire Hazard Severity Zones in LRA)***

No Impact. The site is located in an urbanized area and there are no large undeveloped areas and steep slopes on or near the site that may pose wildfire hazards. The project site and the surrounding areas are not in designated Fire Hazard Areas, as shown in Figure PS-7 of the General Plan 2025 or in a Very High Fire Hazard Severity Zone (VHFHSZ), as identified by the California Department of Forestry and Fire Prevention (CalFire). Rather, the site is within a Non-VHFHSZ area. The nearest VHFHSZ is located approximately 1.3 miles southeast of the site, near Mockingbird Canyon. Since the proposed project would not be exposed to nor would it create wildfire hazards (as consistent with Riverside General Plan Objective PS-6), **no impact** related to wildland fires would occur either directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

10a. Response: ***(Source: General Plan 2025 Open Space and Conservation Element Figure OS-9 – Watersheds; General Plan 2025 FPEIR Figure 5.8-1 and Table 5.8-A – Beneficial Uses Receiving Water; Santa Ana Region Basin Plan; USEPA Section 303(d) List; RMC Chapter 14.12; NPDES Construction General Permit; and Preliminary Water Quality Management Plan prepared by Psomas in February 2018 [included in Appendix H])***

Less Than Significant Impact. The project site is located within the Santa Ana River watershed (General Plan 2025 Figure OS-9 – Watersheds and FPEIR Figure 5.8-1 - Watersheds). The beneficial uses of the Santa Ana River include agriculture; groundwater recharge; water-contact recreation; non-contact water recreation; warm freshwater habitat; wildlife habitat; Rare, Threatened, or Endangered species; and spawning, reproduction, and development. The site drains into the Arlington Channel and Reach 1 of Temescal Creek, which discharges into the Prado Flood Control Basin. The beneficial uses of Reach 1 of Temescal Creek include non-contact recreation, warm freshwater habitat, and wildlife habitat. The beneficial uses of the Prado Basin include water-contact recreation; non-contact water recreation; warm freshwater habitat; wildlife habitat; and Rare, Threatened, or Endangered species. The USEPA Section 303(d) List shows that Arlington Channel and Reach 1 of Temescal Creek are not impaired water bodies, but the Prado Flood Control Basin is considered impaired for pH, and a Total Maximum Daily Load (TMDL) has been established for this pollutant.

The project site is currently part of a plant nursery, and runoff flows northwesterly toward Van Buren Boulevard, where it flows northwesterly along the gutter to an existing catch basin and storm drain line in Van Buren Boulevard near Rudicill Street, which, in turn, ties into the storm drain line in Myers Street that connects to the Arlington Channel. Potential pollutants in the runoff from the site include loose soils, sediments, oil and grease, and organic materials from plant nursery operations.

During demolition and construction activities, pollutants such as loose soils and organic materials, oil and grease, vehicle fluids, paint, and other solvents, may enter the City's storm drainage system and contribute pollutants to downstream water bodies, including the impairment of the Prado Basin. Project construction activities are required to be conducted in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (NPDES No. CAS000002, Water Quality Order No 2009-009-DWQ[1], or the latest approved Construction General Permit). The NPDES Construction General Permit requires construction activities that involve the disturbance of one acre or more of total land area to prepare and implement a SWPPP that contains BMPs that would have to be implemented during construction activities so as to reduce or eliminate construction-related pollutants in the runoff. Compliance with the NPDES Construction General Permit and implementation of BMPs in the SWPPP would effectively control erosion and sedimentation and other construction-related pollutants from entering the storm drainage system during construction activities at the site.

Upon construction of the buildings and site improvements for the project, the permeable area of the project site would be limited to approximately 12,000 square feet of landscaped areas (18.6 percent of the site), with the rest of the area paved or built over. Long-term changes in storm water runoff quality would occur with proposed driveways, internal drive aisles, and parking areas; trash collection areas; and landscaped areas on the site. Storm water pollutants that may be generated by the proposed project would be associated with the restaurant, gas station, and convenience store and would include pathogens, heavy metals, nutrients, pesticides, organic compounds, sediments, trash and debris, oxygen-demanding substances, and oil and grease.

[1] NPDES No. CAS000002, Water Quality Order 2009-0009- DWQ, SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction Activity (adopted by the SWRCB on September 2, 2009, and effective on July 1, 2010). This order was amended by 2010-0014-DWQ, which became effective on February 14, 2011, and 2012-0006-DWQ, which became effective on July 17, 2012. In accordance with the language set forth in Order No. 2009-0009-DWQ, this permit has been administratively extended indefinitely.

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

Under the NPDES, a Municipal Separate Storm Sewer System Permit (MS4 Permit) has been issued to the Riverside County Flood Control and Water Conservation District (RCFC&WCD), the County of Riverside, and co-permittees in the Santa Ana River Basin Region (including the City of Riverside). In compliance with the MS4 Permit, Chapter 14.12 of the RMC contains the City's regulations for storm water and runoff pollution control, which prohibit specific types of discharges into the storm drainage system and require the implementation of construction and post-construction BMPs. A Preliminary Water Quality Management Plan (WQMP) has been prepared for the proposed project (consistent with General Plan Policy OS-10.9) that identifies post-construction (permanent) water quality BMPs that would be constructed, maintained, and implemented on site to reduce pollutants in the storm water. The Preliminary WQMP is included in Appendix H of this Initial Study.

The Preliminary WQMP proposes that storm water pollutants from the project be treated through site design, source control, and treatment control BMPs. As proposed in the Preliminary WQMP and shown on Exhibit 13, the project would include two storm water treatment chambers (or hydrodynamic separators) and two underground infiltration chambers (linear chambers with a pervious bottom consisting of an angular stone foundation base on a geotextile layer) that would capture storm water on the site through grate inlets and allow for pollutant removal and ground infiltration. The hydrodynamic separators would remove coarse sediment, debris, and free-floating oil in the storm water runoff. The underground infiltration chambers would allow treated storm water to infiltrate into the soils.

The storm water treatment chambers and underground infiltration chambers would be located in the internal drive aisle beside the restaurant building and beside the gas station canopy. Overflows from the underground infiltration chambers would be directed into storm drain lines that would direct storm water runoff to the northern end of the site at Van Buren Boulevard, where it would flow northwesterly into the catch basin in Van Buren Boulevard, near Rudicill Street.

Due to the size of the site (1.49 acres) and since the runoff volume and rate would not be significantly different from existing conditions, no significant change in the runoff volumes and rates that would be discharged into the Arlington Channel, Reach 1 of Temescal Creek, and Prado Basin would occur.

Consistent with General Plan Objective PF-4 and Policy PF-4.2, the proposed project would also comply with Chapter 14.12 of the RMC, which sets storm water discharge prohibitions and regulations to reduce pollutants in the storm water, including requirements for oil/grease interceptors for discharges into the City's sewer system. In addition, non-structural BMPs are outlined in the Preliminary WQMP and include storm drain inlet signage; restrictions on pesticide use, food service cleaning areas, trash storage areas, and sweeping of fuel dispensing areas; rooftop equipment roofs; and sweeping activities. Permanent structural BMPs in the WQMP would be constructed as part of the proposed project, and non-structural BMPs shall be implemented during long-term use and operation of the proposed project.

In addition, the underground fuel storage tanks would be designed and constructed in accordance with pertinent regulations by the Riverside Fire Department and other agencies, which require the provision of corrosion protection, overfill prevention, spill prevention, and release detection features and systems, as well as corrective action for leaks, consistent with General Plan Policy PF-1.7. This would reduce the potential for fuel spills to enter the storm drain system.

With project compliance with the MS4 Permit, NPDES Construction General Permit, the City's storm water regulations through implementation of the SWPPP and WQMP, and Riverside Fire Department regulations for gasoline stations, the proposed project would not violate any water quality standards and would not degrade surface or ground water quality by contributing pollutants or discharge. The project would result in a **less than significant impact** directly, indirectly or cumulatively as it relates to water quality standards and surface and ground water quality.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project impede sustainable groundwater management of the basin?	☐	☐	☒	☐

10b. Response: ***(Source: General Plan 2025 Figure PF 1.1 – Water Basins Groundwater Recharge Areas; RPU Map of Water Supply Basins and Urban Water Management Plan; California's Groundwater Bulletin118; Phase I and Phase II Environmental Site Assessment; and Preliminary Soil Investigation Report)***

Less than Significant Impact. The project site is underlain by the Riverside Arlington Subbasin of the Upper Santa Ana Valley Groundwater Basin. This subbasin is bound by impermeable rocks of the Box Springs Mountains, Arlington Mountain, La Sierra Heights, and Mount Rubidoux and the Jurupa Mountains (Stantec 2017). Recharge of this subbasin occurs by underflows from the Chino Subbasin through the Rialto-Colton fault, infiltration of Santa Ana River flow, return irrigation flow, and percolation of rainfall (DWR 2004). Groundwater was not encountered in soil borings up to 25 feet below ground surface (bgs) at the site and was not encountered at depths of 51.5 feet bgs in soil borings near the site. Groundwater has been recorded approximately 1 mile southeast of the site at 42 feet bgs in 1995 and 75 feet bgs in 2017 (GTL 2018).

Proposed excavation activities would not extend deep enough to affect underlying groundwater resources. Also, the proposed project would not interfere with groundwater recharge since the site does not serve as a recharge basin and no groundwater well is proposed as part of the project. Also, the project would not create a significant demand for water that may indirectly deplete groundwater supplies or interfere substantially with groundwater recharge, such that a net deficit in aquifer volume or a lowering of the local groundwater table level would result.

Water service to the proposed project would be provided by the City, which obtains its water supply from local groundwater resources (e.g., Bunker Hill, Riverside North, and Riverside South subbasins). Additional water supply is available from the Rialto-Colton groundwater basin, recycled water from the City's Regional Water Quality Control Plant (RWQCP), and imported water from the Metropolitan Water District of Southern California. The RPU Urban Water Management Plan (UWMP) states that nearly 75,128 acre-feet of groundwater was extracted by RPU in 2015 to meet demand, with 2040 demand estimated at 104,257 acre-feet, which would be met by increased groundwater extraction, recycled water use, and imported water supplies (Riverside 2016b).

While an indirect demand for groundwater supplies would occur with the proposed project, this demand (estimated at 29,250 gallons per day (gpd) or 32.85 acre-feet per year - see discussion under Threshold 19b in Section 19, Utilities and Service Systems) would represent a limited amount of the City's total water supply (116,903 acre-feet per year in 2020 and 124,703 acre-feet per year in 2040) or the projected demands that would be met by groundwater resources (74,928 acre-feet in 2015 and projected at 97,827 acre-feet per year in 2040). Also, there is excess water supply in the City over projected demand (21,682 acre-feet in 2020 and 20,446 acre-feet in 2040) that could serve the project. In addition, the proposed project would be connected to the City's sewer system, which would increase recycled water production. The proposed project would comply with NPDES and WQMP requirements for continued on-site infiltration of storm water and to ensure the proposed project would not substantially decrease groundwater supplies and adversely affect sustainable groundwater management of the basin by interfering with groundwater recharge. Therefore, there would be a **less than significant impact** to groundwater supplies and recharge either directly, indirectly, or cumulatively.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐

10c.i Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, and Appendix E – Geotechnical Report; Preliminary Soil Investigation Report [included in Appendix E]; and RMC Title 17 – Grading Code and Title 18 – Subdivision Code)***

Less Than Significant Impact. As indicated in Threshold 7b in Section 7, Geology and Soils, the project would be required

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

to obtain a NPDES permit for construction activities or coverage under the NPDES Construction General Permit. The Construction General Permit requires preparation of a SWPPP and implementation of erosion control, sediment control, tracking, waste management, and construction site maintenance BMPs to reduce the potential for soil and wind erosion during construction activities.

In the long term, the proposed project would decrease the amount of pervious surface, resulting in less surface area exposed to potential erosion. Soil and pollutants flowing off site (by wind or water erosion) would be reduced by landscaped and paved areas. Thus, areas of exposed soils would be minimal following construction of the proposed project, and the potential for erosion would be limited. Additionally, the proposed project must comply with the City's erosion control standards (Title 18, Subdivisions, of the RMC) and the City's Grading Code (Title 17 of the RMC), which require the implementation of measures to minimize soil erosion. Compliance with NPDES Construction General Permit requirements, as well as Titles 17 and 18 of the RMC, would ensure that operation-related erosion impacts would be **less than significant** directly, indirectly, and cumulatively.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐

10c.ii Response: ***(Source: Preliminary Water Quality Management Plan prepared by Psomas in February 2018 [included in Appendix H])***

Less than Significant Impact. The proposed project would result in changes in on-site drainage patterns due to the construction of buildings and site improvements. Approximately 81.4 percent of the site would be covered with buildings, parking areas, internal drive aisles, and other impervious areas; and 18.6 percent would be pervious (i.e., landscaped areas), compared to approximately 76.9 percent of pervious areas under existing conditions. The on-site storm drain system has been designed to accommodate the 10-year and 100-year storm flows. Storm water from building roofs and impervious areas would be directed into grate inlets connected to storm water treatment chambers that would reduce pollutants in the storm water and be connected to the underground infiltration chambers to allow for ground infiltration.

The change in drainage patterns would be localized (internal to the site) and relatively minor. Existing runoff flows would still flow northwesterly along the gutter on Van Buren Boulevard and into the catch basin and storm drain line in Van Buren Boulevard. Also, the runoff volume and rate would not be significantly different (a difference of less than 5 percent) from existing conditions. The change in runoff volume and rate and the change in off-site drainage patterns that could affect the course of water flows in the area would be minimal; no flooding on-site or off-site would occur as a result of the proposed project. Thus, there would be **less than significant impact** directly, indirectly, or cumulatively since the change in the on-site drainage pattern would not result in flooding on- or off-site.

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐

10c.iii. Response: (Source: Preliminary Water Quality Management Plan prepared by Psomas in February 2018 [included in Appendix H])

Less Than Significant Impact. Under existing conditions, the majority of storm water percolates into the ground and runoff flows northwesterly to the storm drain line in Van Buren Boulevard, near Rudicill Street. The on-site storm drain system has been designed to accommodate the 10-year and 100-year storm flows. As discussed under Threshold 10a above, the proposed storm drain system would convey storm water into two hydrodynamic separators that would reduce pollutants in the storm water and that would be connected to underground infiltration chambers to allow for ground infiltration of treated storm water. Overflows from the infiltration chambers would be conveyed via storm drain lines for discharge into Van Buren Boulevard. With the project, the runoff volume and rate would not be significantly different (a difference of less than 5 percent) from existing conditions. The change in runoff volume and rate and the change in off-site drainage patterns would

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

not be large enough to exceed the capacity of the downstream storm drain lines and drainage channels. With the on-site treatment of stormwater, additional sources of polluted runoff would not be significant.

As discussed under Threshold 10a, the proposed project is subject to the NPDES Construction General Permit, which requires preparation of an SWPPP and implementation of BMPs, which would reduce the potential for construction debris and other pollutants to enter the City's storm drain lines. Construction-related impacts on the capacity of the storm drain system and sources of runoff pollutants would be temporary and less than significant.

Therefore, the proposed project would not create or contribute storm water runoff exceeding capacity of existing storm water drainage systems nor provide substantial additional sources of polluted runoff. There would be a **less than significant impact** directly, indirectly, or cumulatively.

iv. impede or redirect flood flows?	☐	☐	☒	☐

10c.iv. Response: ***(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas; FEMA Flood Hazard Map No. 06065C0715G and 06065C0720G; Preliminary Water Quality Management Plan prepared by Psomas in February 2018 [included in Appendix H])***

Less Than Significant Impact. The project site is not located within or near a flood hazard area as depicted on General Plan 2025 FPEIR Figure 5.8-2 – Flood Hazard Areas and in the FEMA's Flood Insurance Rate Map (Map No. 06065C0715G and 06065C0720G). The project site is located within Zone X, which is designated as an area of minimal flood hazard. Because the project site is not located within a flood hazard area, the project would not substantially alter the existing drainage pattern of the site or area and would not impede or redirect flood waters. **Less than significant impacts** related to the redirection of flood flows directly, indirectly, or cumulatively would result.

As indicated above in Threshold 10c.iii above, under existing conditions, the majority of storm water percolates into the ground and runoff flows northwesterly to the storm drain line in Van Buren Boulevard, near Rudicill Street.

As indicated above in Response 10a, according to the Preliminary WQMP, storm water pollutants from the project would be treated through site design, source control, and treatment control BMPs. As proposed in the Preliminary WQMP and shown on Exhibit 13, the project would include two storm water treatment chambers (or hydrodynamic separators) and two underground infiltration chambers (linear chambers with a pervious bottom consisting of an angular stone foundation base on a geotextile layer) that would capture storm water on the site through grate inlets and allow for pollutant removal and ground infiltration. The storm water treatment chambers and underground infiltration chambers would be located in the internal drive aisle beside the restaurant building and beside the gas station canopy. Overflows from the underground infiltration chambers would be directed into storm drain lines that would direct storm water runoff to the northern end of the site at Van Buren Boulevard, where it would flow northwesterly into the catch basin in Van Buren Boulevard, near Rudicill Street. Due to the size of the site (1.507acres) and since the runoff volume and rate would not be significantly different from existing conditions, no significant change in the runoff volumes and rates that would be discharged into the Arlington Channel, Reach 1 of Temescal Creek, and Prado Basin would occur. Implementation of temporary and permanent erosion control BMPs in the project's SWPPP and WQMP would ensure that substantial erosion or siltation would not occur on- or off-site during short term construction and long-term use of the project. The increase in pervious surfaces on the site is expected to reduce the runoff volume and rate; resulting in less potential for downstream erosion. Therefore, the project would not result in erosion or siltation that would alter the drainage pattern of the area. The project would result in l**ess than significant impacts** related to the redirection of flood flows directly, indirectly, or cumulatively would result.

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

10d. Response: ***(Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas; FEMA Flood Hazard Map No. 06065C0715G and 06065C0720G; GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality; General Plan 2025 Public Safety Element Figure PS-4 – Flood Hazard Areas; Preliminary Soil Investigation Report; and USGS National Map Viewer)***

No Impact. As previously discussed, the project site is not located within or near a flood hazard area as depicted on General Plan 2025 FPEIR Figure 5.8-2 – Flood Hazard Areas and in the FEMA's Flood Insurance Rate Map (Map No. 06065C0715G and 06065C0720G). A seiche is the resonant oscillation of a body of water, caused by earthquake shaking (waves). Seiche hazards exist where ground shaking can cause water to splash out of an open body of water and inundate nearby areas and structures. The project site is not exposed to inundation hazards due to a seiche since the site is not located near a large open body of water, such as Lake Mathews (approximately 3.5 miles south), Lake Evans (approximately 6.7 miles northeast), Mockingbird Reservoir (approximately 1.4 miles southeast), Woodcrest Dam (approximately 3.3 miles east), Perris Reservoir (approximately 14.2 miles east), or the Santa Ana River (approximately 4.0 miles northwest). Also, failure of these dams and facilities would not cause inundation at the site.

Tsunamis are seismic sea waves generated by undersea earthquakes or landslides that occur in coastal areas; the City of Riverside is not located in a coastal area. The project site is located approximately 33 miles inland and, thus, is not subject to tsunami hazards. Also, no steep slopes are on or near the site that may pose mudflow hazards, and the site is not on or near Arlington Mountain, Norco Hills, Temescal Mountains, or any of the arroyos that run through the City. Rather, the site and the surrounding area have a generally flat topography within an urbanized area that is not near the coast, hillsides, or water bodies. Therefore, **no impact** related to the potential for seiche, tsunami, or mudflow would occur with the proposed project either directly, indirectly, or cumulatively.

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

10e. Response: ***(Source: General Plan 2025 Open Space and Conservation Element Figure OS-9 – Watersheds; General Plan 2025 FPEIR Figure 5.8-1 and Table 5.8-A – Beneficial Uses Receiving Water; Santa Ana Region Basin Plan; USEPA Section 303(d) List; RMC Chapter 14.12; NPDES Construction General Permit; and Preliminary Water Quality Management Plan prepared by Psomas in February 2018 [included in Appendix H]; General Plan 2025 Figure PF 1.1 – Water Basins Groundwater Recharge Areas; RPU Map of Water Supply Basins and Urban Water Management Plan; California's Groundwater Bulletin118; Phase I and Phase II Environmental Site Assessment; and Preliminary Soil Investigation Report)***

Less Than Significant Impact. As discussed above in Threshold 10a, the project would be in compliance with applicable water quality regulations for short-term and long-term impacts. Specifically, the project would have coverage under the NPDES Construction General Permit, and implementation of the project's SWPPP would ensure that short-term, construction-related water quality impacts would be less than significant. For long-term water quality impacts, under the NPDES, a Municipal Separate Storm Sewer System Permit (MS4 Permit) has been issued to the Riverside County Flood Control and Water Conservation District (RCFC&WCD), the County of Riverside, and co-permittees in the Santa Ana River Basin Region (including the City of Riverside). In compliance with the MS4 Permit, Chapter 14.12 of the RMC contains the City's regulations for storm water and runoff pollution control, which prohibit specific types of discharges into the storm drainage system and require the implementation of construction and post-construction BMPs. A Preliminary WQMP has been prepared for the proposed project (consistent with General Plan Policy OS-10.9) that identifies post-construction (permanent) water quality BMPs that would be constructed, maintained, and implemented on site to reduce pollutants in the storm water. Therefore, with implementation of the permanent BMPs in the WQMP, the project would generate less stormwater pollutants than under existing conditions.

As indicated in Threshold 10b above, proposed excavation activities would not extend deep enough to affect underlying groundwater resources. Also, the proposed project would not interfere with groundwater recharge since the site does not serve

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

as a recharge basin and no groundwater well is proposed as part of the project. Additionally, the project would not create a significant demand for water that may indirectly deplete groundwater supplies or interfere substantially with groundwater recharge, such that a net deficit in aquifer volume or a lowering of the local groundwater table level would result.

Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be **less than significant** directly, indirectly, or cumulatively.

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

11a. Response: ***(Source: General Plan 2025 Land Use and Urban Design Element and Figure LU-2 – Urban Design Framework; Conceptual Site Plan; and City of Riverside Arlington South Neighborhood Map)***

No Impact. The project site is located within the Arlington South Neighborhood, which is a residential neighborhood with commercial and industrial areas along Indiana Avenue, SR-91, and Van Buren Boulevard. The site is at the central section of this neighborhood, west of the intersection of Van Buren Boulevard and Lincoln Avenue. The site makes up the southeastern portion of a plant nursery. Van Buren Boulevard and Lincoln Plaza are located to the northeast, with the remaining portion of the plant nursery to the northwest and southwest, and Lincoln Avenue and single-family residential uses to the south and southeast. The project would not displace existing residences or divide an established community (as no residences are present on the site or immediately adjacent to the site). In addition, the project would not divide or disrupt the physical arrangement of residential areas farther to the northwest, west, south, and southeast of the site. The proposed project would be served by improved public streets and utility infrastructure and does not involve the creation of streets that could alter the existing pattern of development or an established community. Therefore, **no impact** directly, indirectly, or cumulatively to an established community would occur with the proposed project.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

11b. Response: ***(Source: General Plan 2025 Land Use and Urban Design Element, Figure LU-10 – Land Use Policy Map, and Table LU-5 – Zoning/General Plan Consistency Matrix; RMC Title 19 – Zoning Code; and 2014-2021 Housing Element)***

Less than Significant Impact. As part of the City's Housing Element update, the project site was recently re-designated in the General Plan as VHDR - Very High Density Residential. The VHDR designation allows high-density residential development at a maximum density of 40 units per acre. A General Plan Amendment (GPA) is needed for the proposed project to change the site's land use designation to C - Commercial, which would allow retail commercial uses at a maximum floor area ratio (FAR) of 0.5. The remaining 5.34-acre plant nursery parcel west and northwest of the site would retain its VHDR designation. The site is located in close proximity to Lincoln Plaza (across Van Buren Boulevard), which is also designated as Commercial.

The Riverside General Plan identifies objectives and policies that build upon the vision for the City, as outlined in the General Plan, and provide the structure for each of the General Plan's Elements. In addition to the Elements mandated by State law, the City's General Plan includes additional Elements to reflect the spirit of the City. These include the Arts and Culture Element, Education Element, Air Quality Element, Parks and Recreation Element, and Historic Preservation Element. The State's general rule for a General Plan consistency determination is that "an action, program, or project is consistent with the General Plan if, considering all its aspects, it would further the objectives and policies of the General Plan and not obstruct their attainment" (OPR 2003).

The proposed project would not conflict with the Riverside General Plan objectives and policies for the Arlington South neighborhood. These include Objective LU-40, which calls for conservation of the single-family residential character of the neighborhood. The project would not directly or indirectly impact existing single-family residences; and the proposed

restaurant and gas station and convenience store would maintain a commercial use of the site, which is currently occupied by a commercial plant nursery. Policy LU-40.1 calls for commercial uses around the Van Buren/Indiana intersection. While the proposed project is not located at this intersection, it would be located near an existing shopping center (Lincoln Plaza) across Van Buren Boulevard. Policy LU-40.2 relates to industrial properties and does not apply to the site. Policy LU-40.3 calls for investment in a range of housing opportunities. The project is not a residential development but would maintain residential development on over 75 percent of the plant nursery site and would provide commercial uses to support the existing and planned residential development. Policy LU-40.4 addresses the residential grid street system, and the project does not propose new public roads. Objective LU-41 calls for economic revitalization of the Arlington South neighborhood. The project would revitalize the neighborhood through new investment in the area and the provision of additional goods and services. Policy LU-41.1 encourages cooperation between the City and the local business community. The project would introduce new local businesses that would promote cooperation with the City. Policy LU-41.2 calls for well-maintained commercial uses and compatibility with adjacent residential uses. The project would comply with City regulations for property maintenance and has been designed to be compatible with the future residential development on the remainder of the plant nursery site. Policy LU-41.3 addresses the redevelopment of the Van Buren Drive-in Theater and adjacent properties. The project would not be located on these properties.

The project is also consistent with General Plan Objective LU-8 and Policies LU-8.1, LU-8.3, CCM-9.1, H-2.2, OS-8.7, and AQ-1.12 relating to Smart Growth and mixed-use developments near transportation corridors, as it would add commercial uses on a portion of a residentially-zoned parcel that is served by transit. The project would not conflict with Policy LU-8.2 since it would support future adjacent residential uses and would be located adjacent to commercial uses.

The site was recently rezoned R-4 – Multi-Family Residential Zone, which allows high density multi-family residences. The proposed project would require a Rezone to the CR – Commercial Retail, which allows retail, sales, service, office and commercial uses, to match the proposed General Plan land use designation for the site. The proposed GPA and Rezone would not result in land use conflict or incompatibility since the proposed project would be located adjacent to existing commercial uses and would serve the surrounding residential neighborhood. The proposed project would comply with the commercial and industrial development standards in the RMC, including minimum lot area, depth and width, setbacks, maximum building height, and floor area ratio. The project would be subject to design review for compliance with the City's design guidelines and would require conditional use permits for operation of a restaurant with a drive thru lane and for the gasoline station. Compliance with City land use regulations and permit conditions would avoid conflict with applicable land use plans and policies.

With respect to regional planning, the Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for Riverside, Los Angeles, Orange, San Bernardino, Ventura, and Imperial counties. The federal government mandates SCAG, as the designated MPO, to prepare plans for growth management, transportation, air quality, and hazardous waste management. In addition, SCAG reviews EIRs for projects of regional significance for consistency with its regional plans. The policies and strategies of SCAG's regional planning programs, including the Regional Comprehensive Plan (RCP), Regional Housing Needs Assessment (RHNA), and RTP/SCS, are not applicable to the proposed project because the project is not of Statewide, Regional, or Areawide Significance. The proposed project would also not exceed the growth and development forecast assumptions used in these regional plans (see discussion below under Threshold 14a in Section 14, Population and Housing).

As such, this project would have a **less than significant impact** as no conflict would occur with any land use plan, policy, or regulation directly, indirectly or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

12a. Response: ***(Source: General Plan 2025 Figure OS-1 – Mineral Resources; Mineral Land Classification of the Greater Los Angeles Area; DOGGR Oil, Gas and Geothermal Fields in California; and DOGGR Well Finder)***

No Impact. The Mineral Land Classification of the Greater Los Angeles Area shows that the project site is designated as Mineral Resource Zone (MRZ) 3—an area containing mineral deposits, the significance of which cannot be evaluated from available data. Figure OS-1 - Mineral Resources in the General Plan 2025 has no mineral designation for the site and surrounding areas and there are no sites identified as containing feldspar, silica, limestone and rock products near the site. The project area supports urban development, and no mining or mineral extraction activities occur at the site or adjacent to the site. No oil, gas or geothermal fields underlie the project site. Review of the California Division of Oil, Gas, and Geothermal Resources' (DOGGR's) Well Finder shows no oil or gas wells are on the project site or in the vicinity of the site. The nearest well is a dry hole located approximately 7.8 miles southwest of the project site.

The project does not propose the extraction of mineral resources. No mineral resources have been identified on the project site, and no historical use of the site or surrounding area for mineral extraction purposes is documented. The project site is not, nor is it adjacent to, a locally important mineral resource recovery site delineated in the City's General Plan 2025 Open Space and Conservation Element. Therefore, the proposed project would have **no impact** on regional or Statewide mineral resources directly, indirectly, or cumulatively.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

12b. Response: ***(Source: General Plan 2025 Open Space and Conservation Element and Figure OS-1 – Mineral Resources)***

No Impact. The General Plan 2025 Open Space and Conservation Element states that mining activities are occurring outside the City's urban center. Figure OS-1 – Mineral Resources in the Open Space and Conservation Element shows the site and surrounding area are located outside the MRZ-3 zone, where known or inferred mineral occurrences of undetermined significance are present. The project site is not located near any identified mineral resources or extraction areas or in areas identified to have deposits of feldspar, silica, limestone, and other rock products. Thus, the proposed project would not result in the loss of availability of a locally important mineral resource or mineral recovery site nor would it affect access to and the availability of underlying mineral resources. **No impact** on local mineral resources directly, indirectly, or cumulatively would occur.

13. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

13a. Response: ***(Source: General Plan 2025 Noise Element, Figure N-8 – Riverside and Flabob Airport Noise Contours, and Figure N-10 – Noise/Land Use Noise Compatibility Criteria; General Plan 2025 FPEIR Table 5.11-E – Interior and Exterior Noise Standards; RMC Title 7 – Noise; and Noise and Vibration Study prepared by Psomas in May 2018 [included in Appendix I])***

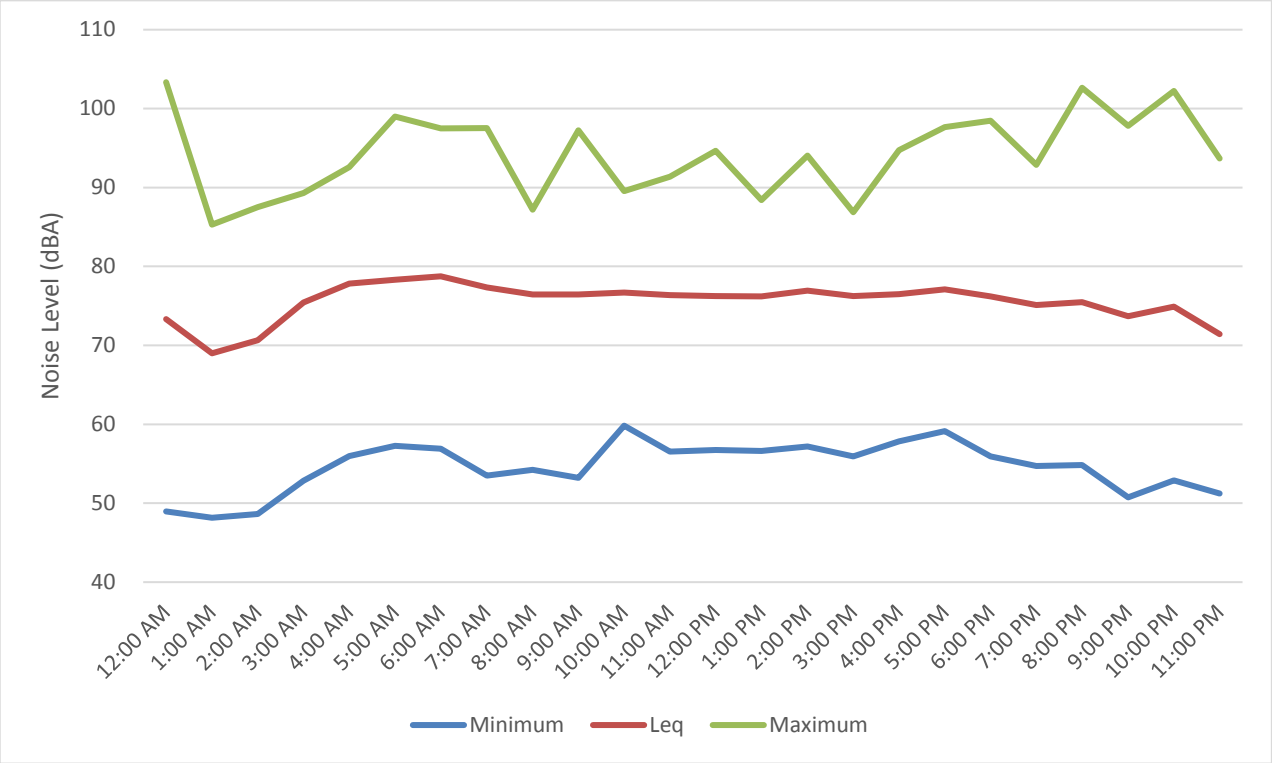
Less Than Significant Impact. An ambient noise measurement program was initiated along Lincoln Avenue and Van Buren Boulevard. The existing noise environment in the project area is primarily affected by traffic noise on nearby roadways. The

roadways contributing the most noise to the project site are Van Buren Boulevard and, to a much lesser extent, Lincoln Avenue. For the purpose of this noise analysis, the study area includes the project site, the areas immediately adjacent to the project site, and the land uses adjacent to the roadway segments where the project adds vehicular trips to the circulation system.

Psomas conducted ambient noise surveys for the project, on August 8 and 9, 2019. Noise level measurements were taken using a Larson Davis Laboratories SoundTrack LxT sound level meter (LD LxT) and a Larson Davis Laboratories Model 831 integrating sound level meter (LD 831). These sound level meters were placed proximate to each of the two roadways, approximately 5 feet above the ground and equipped with a windscreen.

The noise level measurements were collected for 24 hours, proximate to the northern and eastern property lines. The average (L_{eq}), maximum (L_{max}), and minimum noise level (L_{min}) values taken at each ambient noise measurement location are presented on the following graphs, *Hourly Noise Levels at Van Buren Boulevard*, and *Hourly Noise Levels at Lincoln Avenue*, for the respective noise monitoring locations. As shown on Exhibit 4, Hourly Noise Levels at Van Buren Boulevard, average daytime noise levels at Van Buren Boulevard ranges from 69 to 79 dBA Leq. The 24-hour weighted noise level at this location is 82 dBA CNEL. The measured noise levels are representative of a busy roadway.

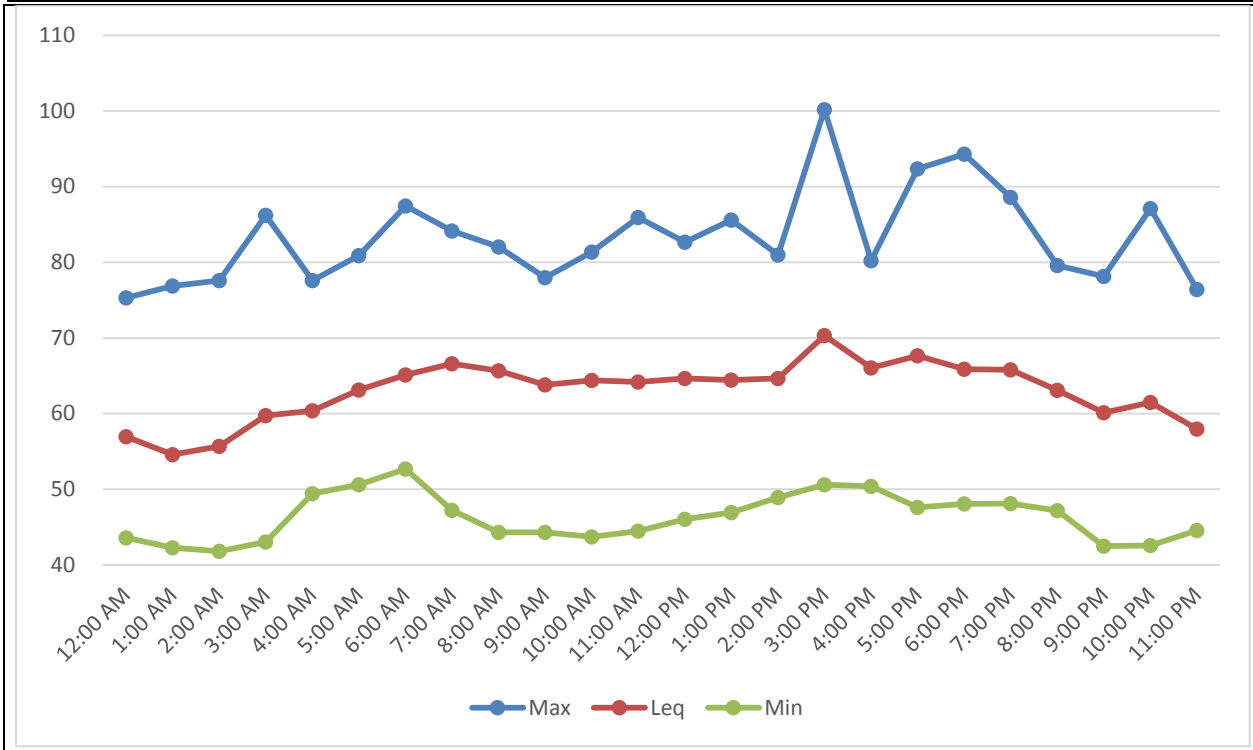
HOURLY NOISE LEVELS AT VAN BUREN BOULEVARD



Noise monitoring was also conducted along Lincoln Avenue. As shown on Exhibit 5, Hourly Noise Levels at Lincoln Avenue, average daytime noise levels in the study area range from 55 to 70 dBA Leq. The 24-hour weighted noise level at this location is 69 dBA CNEL. The measured noise levels are representative of suburban environmental setting.

HOURLY NOISE LEVELS AT LINCOLN AVENUE

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



Impact Criteria

The impact analysis for noise associated with the project is based on numerous noise criteria, which include those limits established within the Municipal Code, as well as audible increases in noise levels with and without the project. For construction activities, noise generated by offroad vehicles would result in temporary increases over ambient noise levels due to the nature of the activity. Section 7.35.010 of the Municipal Code limits noise to the least noise sensitive portions of the day. Restrictions on construction noise generation to the hours established within the Municipal Code would result in less than significant noise impacts, and no mitigation is required.

For the operations phase of the project, the City has established noise limits for stationary sources of noise within Title 7, Noise Control, of the RMC. The City considers these noise level limits the limits necessary to maintain the public health, safety, and welfare of the public interest. These noise level limits are based on specific noise levels developed for stationary noise sources occurring within the City. Project related noise levels, which are below these City-adopted noise limits would result in less than significant noise impacts. Mobile sources of noise, such as project-generated traffic, are regulated by the State of California and the U.S. Environmental Protection Agency (USEPA). However, the term "substantial," as used in this threshold, is not defined in most environmental compliance guidelines. The EIR for the Riverside General Plan identifies that "most people only notice a change in the noise environment when the difference in noise levels are around 3 dB CNEL", and "An increase or decrease in noise level of at least 5 dBA is required before any noticeable change in community response would be expected. Therefore, a clearly perceptible increase (+5 dB) in noise exposure of sensitive receptors could be considered significant." For purposes of identifying substantial increases in traffic noise attributable to the proposed project, a 5-dBA permanent increase in ambient noise levels due to the project is considered a significant impact. Cumulative traffic noise levels were assessed based on increases in noise levels between future with project conditions and compared to existing conditions.

Project Construction Noise

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

The proposed project would generate noise associated with on-site construction equipment and off-site trucks used to haul nursery materials, building materials and soils. The Riverside Noise Ordinance (Section 7.35.010 B 5 of the RMC) limits construction noise to the hours between 7:00 AM and 7:00 PM on weekdays, between 8:00 AM and 5:00 PM on Saturdays, and at no time on Sundays or federal holidays. The proposed project would comply with the restrictions on when construction activity is allowed, as identified within Section 7.35.010 B 5 of the RMC.

City Noise Regulations

The City's Noise Ordinance sets exterior and interior noise standards for noise generated to various land use categories. These noise limits apply to the generation of noise and not to land use compatibility with ambient background noise. The exterior noise standards in Table 10 are applied as follows:

"Unless a variance has been granted as provided in this chapter, it shall be unlawful for any person to cause or allow the creation of any noise which exceeds the following:

1. The exterior noise standard of the applicable land use category, up to five decibels, for a cumulative period of more than thirty minutes in any hour; or
2. The exterior noise standard of the applicable land use category, plus five decibels, for a cumulative period of more than fifteen minutes in any hour; or
3. The exterior noise standard of the applicable land use category, plus ten decibels, for a cumulative period of more than five minutes in any hour; or
4. The exterior noise standard of the applicable land use category, plus fifteen decibels, for the cumulative period of more than one minute in any hour; or
5. The exterior noise standard for the applicable land use category, plus twenty decibels or the maximum measured ambient noise level, for any period of time."

TABLE 10
CITY OF RIVERSIDE EXTERIOR NOISE STANDARDS

Land Use Category	Time Period	Noise Level (dBA)
Residential	Night (10 PM to 7 AM)	45
	Day (7 AM to 10 PM)	55
Office Commercial	Any time	65
Community Support	Any time	60
dBA: A-weighted decibels Source: Riverside 2014 (Table 7.25.010A).		

Table 11 shows the City's interior noise standards.

TABLE 11
CITY OF RIVERSIDE INTERIOR NOISE STANDARDS

Land Use Category	Time Period	Noise Level (Dba)
Residential	Night (10 PM to 7 AM)	35
	Day (7 AM to 10 PM)	45
School	7AM to 10 PM (while school is in session)	45

Hospital	Any time	45
dBA: A-weighted decibels Source: Riverside 2014 (Table 7.30.015).		

These standards are applied as follows:

"A. No person shall operate or cause to be operated, any source of sound indoors which causes the noise level, when measured inside another dwelling unit, school or hospital, to exceed:

1. The interior noise standard for the applicable land category area, up to five decibels, for a cumulative period of more than five minutes in any hour;

2. The interior noise standard for the applicable land use category, plus five decibels, for a cumulative period of more than one minute in any hour;

3. The interior noise standard for the applicable land use category, plus ten decibels or the maximum measured ambient noise level, for any period of time.

B. If the measured interior ambient noise level exceeds that permissible within the first two noise limit categories in this section, the allowable noise exposure standard shall be increased in five-decibel increments in each category as appropriate to reflect the interior ambient noise level. In the event the interior ambient noise level exceeds the third noise limit category, the maximum allowable interior noise level under said category shall be increased to reflect the maximum interior ambient noise level.

C. The interior noise standard for various land use districts shall apply, unless otherwise specifically indicated, within structures located in designated zones with windows opened or closed as is typical of the season."

Proposed construction activities would temporarily increase noise levels in the vicinity of the project site. In typical construction projects, the loudest noise generally occurs during demolition and grading activities, since they involve the largest equipment. Demolition for the proposed project would take approximately ten days. Grading and excavation would occur for approximately eight days. Subsequently, building construction, paving, and architectural coating activities that would generate less noise than demolition and grading activities would occur for approximately seven months.

Section 7.35.010 B 5 of the Riverside Municipal Code limits construction activity to the hours between 7:00 AM and 7:00 PM on weekdays, between 8:00 AM and 5:00 PM on Saturdays, and at no time on Sundays and federal holidays.

Table 12 shows both the maximum and average noise levels for construction equipment. Maximum noise levels represent the intermittent noise levels from construction equipment occurring nearest to the land uses adjacent to the project site. Average noise levels represent the noise exposure to nearby land uses based on the distance to the center of the project site. Average noise levels are shown to depict construction noise levels that would generally occur at off-site land uses. Maximum intermittent noise levels from general project-related construction activities, excluding pile driving, would range from 71 to 94 dBA Lmax with the maximum noise level at a residential receptor of 88 dBA Lmax. Average construction noise levels would range from 64 to 75 dBA Leq. Construction noise would be heard at nearby receptors and would result in a temporary increase in ambient noise levels; but, because the proposed project would result in construction noise that is limited to the least noise-sensitive portions of the day and would not generate atypically high construction noise levels, the increase would not be considered substantial.

Pile driving for construction of the underground tank area would occur intermittently for a period of up to two weeks. As shown in Table 12, Construction Noise Levels at Adjacent Uses, intermittent noise levels at residential receptors could exceed 90 dBA and may be a temporary nuisance to nearby residents. However, because of the intermittent nature of the pile driving activities, and the limited period, the noise increase would not be considered substantial.

Project-related construction would not result in significant impacts, and no mitigation is required.

TABLE 12
CONSTRUCTION NOISE LEVELS AT ADJACENT USES

	Noise Levels (Leq dBA)							
	Planned Residences to the North of the Project Site		Planned Residences to the West of the Project Site		Residences to the South of the Project Site		Commercial Uses to the East of the Project Site	
Construction Phase	Max (50 ft)[a]	Avg. (265 ft)	Max (121 ft)	Avg (250 ft)	Max (160 ft)	Avg (340 ft)	Max (100b ft)	Avg (225 ft)
Ground Clearing/Demolition	83	69	75	69	73	66	89	70
Excavation	88	74	80	74	78	71	94	75
Pile Driving[c]	91	-	93	-	85	-	86	-
Foundation Construction	81	67	73	67	71	64	87	68
Building Construction	81	67	73	67	71	64	87	68
Paving and Site Cleanup	88	74	80	74	78	71	94	75

L_{eq} dBA: Average noise energy level; Max: maximum; avg: average; ft: feet

[a] Reduced distance due to the widening of Lincoln Avenue.

[b] Reduced distance due to the widening of Van Buren Boulevard.

[c] Distances for pile driving are from the underground tank location: 155 feet for residences to the south, 121 feet for residences to the west, 300 feet for residences to the southeast, and 290 feet for commercial uses to the east.

Note: Noise levels from construction activities do not take into account attenuation provided by intervening structures.

Source: USEPA 1971.

Project Operational Noise

Traffic Noise Increase

The proposed project would generate an estimated 2,737 daily vehicle trips (Ganddini 2019). Project traffic would be divided among the adjacent and nearby roadway segments near the project site, primarily Van Buren Boulevard and Lincoln Avenue.

Table 13, Project-Generated Traffic Noise Increases, shows the Existing, Buildout Year without Project and Buildout Year Plus Project traffic volumes and the estimated traffic noise increase for the road segments that would have the most project-generated traffic. As shown in Table 12, no traffic noise increases would exceed 2.8 dBA, which is less than the 5-dBA threshold. Thus, noise impacts from project traffic would be less than significant, and no mitigation is required.

TABLE 13
PROJECT-GENERATED TRAFFIC NOISE INCREASES

	Traffic Volumes[a]	Project Traffic	Buildout Year

	Existing (ADT)	Opening Year Without Project (ADT)	Opening Year Plus Project (ADT)	Noise Increase (dBA)	Plus Project Traffic Noise Increase (dBA)
Van Buren Boulevard					
Southeast of Lincoln Ave	29,100	33,700	34,400	0.1	0.7
Northeast of Lincoln Ave	29,500	33,200	34,700	0.2	0.7
Southeast of Rudicill St	32,700	38,700	39,900	0.1	0.9
Lincoln Avenue					
Northeast of Van Buren Blvd	7,200	8,400	9,100	0.3	1.0
Southwest of Van Buren Blvd	3,500	4,700	6,600	1.5	2.8
ADT: Average daily traffic volume; dBA: A-weighted decibels, [a] Ganddini 2019					

Stationary Noise to Off-site Receptors

As indicated earlier, the primary stationary noise sources from the project would be HVAC units. Other noise sources from the proposed project include a drive-through window and an outdoor dining area for the fast food restaurant. Noise associated with these uses would include human speech, laughter, amplified speakers, and other activities. This use would be located adjacent to Van Buren Boulevard and over 200 feet from the existing residences to the west and south. As discussed in Thresholds 12a, noise generated on site must comply with the limits in the City of Riverside Noise Ordinance. Land uses along Van Buren Boulevard are primarily commercial uses, and off-site noise must be limited to 65 dBA Leq (30 minutes). Future traffic noise levels along Van Buren Boulevard are estimated at 70 dBA Leq in the daytime and 64 dBA Leq in the nighttime. The addition of 65 dBA Leq, a worst case, would increase the noise level by approximately 1.2 dBA in the daytime and 3.5 dBA in the nighttime.

Land uses along Lincoln Avenue are primarily residential in nature, and off-site noise must be limited to 55 dBA Leq (30 minutes) in the daytime and 45 dBA Leq (30 minutes) in the nighttime. Future traffic noise levels along Lincoln Avenue are estimated at 59 dBA Leq in the daytime and 53 dBA Leq in the nighttime. The addition of 55 dBA Leq in the daytime and 45 dBA Leq in the nighttime, a worst case, would increase the noise level by approximately 1.5 dBA in the daytime and 0.6 dBA in the nighttime. Noise level increases due to on-site sources would be less than 5 dBA, and this impact would be less than significant.

Because the permanent increase in ambient noise levels as a result of the project is less than 5 dB, impacts related to a permanent increase in ambient noise levels would be **less than significant** directly, indirectly, and cumulatively. Also, on-site activities, including the use of stationary equipment, would have to comply with the performance standards for noise, as contained in Section 9.590.090 of the RMC that prohibits unnecessary, excessive and annoying noises from all sources. Compliance with this regulation would reduce operational noise impacts and a **less than significant impact** would occur directly, indirectly, or cumulatively.

On-Site Noise Sources

Operational noise sources associated with the proposed project would include, but not be limited to, mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units), a drive-through window and an outdoor dining area for the fast food restaurant, landscape maintenance equipment, vehicles entering and leaving the site, and trash collection activities.

HVAC units would be roof-mounted and would be surrounded by a parapet or metal screening. The units would be located at least 100 feet from the single-family residential homes south of the site across Lincoln Avenue, 30 feet from the existing commercial plant nursery adjacent to the northwestern property line, 70 feet from the existing commercial nursery adjacent to the southwestern property line, 190 feet from the residences southwest of the project site, and 200 feet from the existing residences southeast of the site across the Van Buren Boulevard-Lincoln Avenue intersection. The project's stationary sources of noise are required to comply with the noise limits established under Title 7, Noise Control of the Riverside

Municipal Code, as previously discussed. The Riverside Noise Ordinance states that noise generated on a site shall not exceed 65 dBA Leq (30 minutes) at the property lines of off-site commercial uses and shall not exceed 55 dBA Leq (30 minutes).

Noise generated by the HVAC at proposed buildings are subject to the noise limitations established within Section 7.25.010.D of the Municipal Code. As discussed previously, air-conditioning units installed after January 1, 1980 shall not produce noise levels in excess of 55 dBA as measured at the property line. Compliance with this noise limit is mandatory for all air-conditioners within the City of Riverside. The project will comply with this noise limit and noise associated within HVACs would be consistent with the stringent noise limit developed to protect noise sensitive uses from noise nuisance. This could be readily achieved by purchasing a quiet commercially available HVAC system, constructing a barrier between the HVAC unit and proposed residential uses to the north, or locating the HVAC unit away from the proposed residential units. As indicated in Regulatory Requirement RR NOI-1, to demonstrate that the noise produced from the HVAC unit is compliant with Section 7.25.010.D of the Municipal Code, the developer will provide manufacturer's data or a brief noise memorandum to the satisfaction of the Planning Department showing that noise levels would be below the City's noise limits.

A drive-through aisle and parking area for the multi-tenant commercial building and the driveway access from Lincoln Avenue would be located adjacent to the northwest and southwest property lines. The existing land use adjacent to these walls is a portion of the plant nursery (commercial), but future use is anticipated to be residential in land use. Noise associated with parking lot activities consists of vehicle engines, door slams, engine starts, and people talking. Noise associated with parking lot activities were quantified based on methods recommended by the U.S. Department of Transportation's Transit Noise and Vibration Impact Assessment (FTA 2006). Noise level exposure at the nearest noise sensitive use were calculated based on peak hourly traffic conditions with 188 automobiles (Ganddini 2019) and one heavy delivery truck accessing the site. Noise associated with parking lot activities are shown in Table 12 below.

Other noise sources from the proposed project include a drive-through window and a menu board with an amplified speaker in addition to nonamplified speech. To assess noise associated with the project's drive-through window and menu board, noise levels of 66 dBA was used for the drive-through window based on a "Raised Speaking" noise level, while noise levels of 72 dBA was based on a "Loud Speaking" noise level (Lazarus 1986). Project related off-site noise is limited by the City to 55 dBA Leq (30 min.) in the daytime and 45 dBA Leq (30 min.) in the nighttime. Noise levels associated with the drive-through window and menu board are shown below in Table 14. As shown in Table 14, noise associated with the project's drive-through window, menu board, and parking lot activities are below the City's noise limits for nearby land uses.

TABLE 14
RETAURANT NOISE LEVELS AT ADJACENT USES

	Noise Levels (Leq dBA)

	Planned Residences to the North of the Project Site	Planned Residences to the West of the Project Site	Residences to the South of the Project Site	Commercial Uses to the East of the Project Site
Daytime Noise				
Drive-Through Window	39	27	23	32
Menu Board	34	34	32	37
Parking Lot Activity	40	50	38	40
Total Noise Levels	43	50	39	42
City Noise Limit (Daytime)	55	55	55	65
Exceeds Daytime Noise Limit?	*No*	*No*	*No*	*No*
Nighttime Noise				
Drive-Through Window	39	27	23	32
Menu Board	34	34	32	37
Parking Lot Activity1	33	42	30	32
Total Noise Levels	41	43	34	39
City Noise Limit (Nighttime)	45	45	45	65
Exceeds Nighttime Noise Limit?	*No*	*No*	*No*	*No*

1 Nighttime parking lot activities assumes that 25% of daytime hourly traffic volumes would occur.
Source: Psomas 2019 (Appendix I, Noise and Vibration Analysis)

An Engineering White Paper (HME 2010) on drive-through sound levels indicates that automatic volume control (AVC) can be incorporated into outbound volume on an outdoor menu boards to adjust to ambient noise levels. Refer to Table 15 below which shows noise levels with and without AVC using a 45 dBA standard. As shown in Table 15, at a distance of 16 feet using a menu board without the AVC system, the have a noise level of approximately 60 dBA. Based on this noise emission level, project-related restaurant menu board noise would be approximately 42 dBA at the nearest residences, located at a distance of 141 feet from the proposed outdoor menu board. This is less than the 45 dBA nighttime noise standard. In addition, the proposed wall separating the project site from the future residences to the north of the site would result in an additional 5dB reduction of noise. Therefore, noise impacts from the outdoor menu board would be less than significant.

TABLE 15
OUTSIDE SPEAKER MENU BOARD NOISE LEVELS AT ADJACENT USES

Distance from Outside Speaker	Decibel Level of standard system with 45 dB of outside noise without AVC	Decibel level of standard system with 45 dB of outside noise with AVC active
1 foot	84 dBA	60 dBA
2 feet	78 dBA	54 dBA
4 feet	72 dBA	48 dBA
8 feet	66 dBA	42 dBA
16 feet	60 dBA	36 dBA

Source: HME 2010.

Noise from driveway access, loading and unloading, trash collection, and landscape maintenance activities would occur intermittently at the project site and would not exceed the City's Noise Ordinance limits since the Noise Ordinance allows noise events to exceed the continuous noise limits when noise events occur for less than 30 minutes in an hour.

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

Therefore, the impacts are considered **less than significant**, as it relates to the exposure of persons to or the generation of noise levels in excess of established City standards and regulations either directly, indirectly, or cumulatively.

Land Use Compatibility

Roadway Noise to On-Site Receptors

The City of Riverside's General Plan 2025 includes a Noise Element, which details the requirements for defining projected future noise conditions and serves as the basis for the City to develop guidelines for identifying compatible land uses and establishing development standards (City of Riverside 2007a). Figure N-10, Noise/Land Use Noise Compatibility Criteria shows the Office Building, Business, Commercial and Professional land use category allows commercial uses in areas with up to 65 dBA CNEL and requires a detailed analysis of noise reduction requirements for commercial uses in areas with up to 75 dBA CNEL. With vehicle traffic as the major noise source in the project area, the proposed project's compatibility is assessed against noise produced by forecasted future vehicle traffic on adjacent roads.

The forecasted buildout year (2025) average daily traffic (ADT) on Van Buren Boulevard adjacent to the project site is 34,700 ADT. The forecasted opening year ADT on Lincoln Avenue adjacent to the project site is 6,600 ADT (Ganddini 2019). The proposed project would not change the posted speed limit of Van Buren Boulevard adjacent to the project site (45 miles per hour) or change the mix of cars, buses, and trucks.

With the projected traffic volumes, the future noise level at the proposed convenience store building facade facing Van Buren Boulevard would be approximately 69 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL), which would be in the Conditionally Acceptable range for noise compatibility. The future noise level at the proposed restaurant building facade facing Van Buren Boulevard would be approximately 72 dBA CNEL, which would also be in the Conditionally Acceptable range for noise compatibility. Both buildings would be built with typical commercial construction and would include dual-pane windows and doors or equivalent and air conditioning systems. This type of construction would provide exterior-to-interior noise reduction of at least 25 dBA; and interior noise levels would be less than 50 dBA CNEL, which is considered acceptable for a commercial retail use.

The future noise level at the proposed convenience store building facade facing Lincoln Avenue would be approximately 61 dBA CNEL, which is in the Normally Acceptable category for commercial uses in terms of noise compatibility. Without noise reduction, the outdoor dining area (patio) for the fast food restaurant would be exposed to noise levels of approximately 67 dBA CNEL. The resulting noise level would be within the 65 to 75 dBA CNEL noise range for the Conditionally Acceptable category for commercial uses in terms of noise compatibility. Light frame buildings would reduce noise levels by at least 20 dBA (FHWA 2011). The City does not have interior noise level limits for interior uses for commercial uses. However, the interior noise level are estimated to be 47 dBA CNEL for the proposed project uses, which is comparable to requirements for interior noise levels for residential uses.

Therefore, the proposed land uses would be compatible with the Riverside General Plan noise standards, and there would be a **less than significant impact**.

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

13b. Response: ***(Source: General Plan 2025 Noise Element Figure N-3 – 2003 Railway Noise, Figure N-7 – 2025 Railroad Noise, and Figure N-8 – Riverside and Flabob Airport Noise Contours; General Plan 2025 FPEIR Appendix G – Noise Existing Conditions Report; Noise and Vibration Analysis prepared by Psomas in May 2018 [included in Appendix I])***

Groundborne vibration generated by construction activities is usually highest during pile-driving, blasting, soil-compacting, jack-hammering, and demolition-related activities. No blasting activities would occur with the proposed project. However,

the proposed project may require pile-driving for the underground storage tanks and would include asphalt demolition, excavation, and soil compaction activities.

The City of Riverside has not developed applicable standards for structural damage from vibration. The California Department of Transportation (Caltrans) has set thresholds for the potential for vibration damage as shown in Table 16 (Caltrans 2013b).

TABLE 16
VIBRATION DAMAGE THRESHOLD CRITERIA

Structure and Condition	Maximum ppv (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

ppv: peak particle velocity; in/sec: inch(es) per second

Note: Transient sources create a single isolated vibration event (e.g., blasting or drop balls). Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans 2013b.

None of the structures on or adjacent to the site are designated as City of Riverside Cultural Heritage Landmarks nor are they part of a historic district (Riverside 2018g). Based on the categories in Table 13, thresholds for the potential for vibration damage are categorized into transient and continuous/frequent intermittent sources. Transient sources are those that generate a single isolated vibration event, such as blasting. Continuous/frequent intermittent sources include impact pile drivers and vibratory compaction equipment. The off-site residential buildings located to the south and west of the project site are not considered historic or fragile or extremely susceptible to vibration damage. A vibration level of 0.3 peak particle velocity (ppv) inch per second (in/sec) is considered a conservative threshold for a potentially significant structural damage vibration impact for older, but not historic, residential buildings to the south and west of the site; and a threshold of 0.5 ppv in/sec is appropriate for off-site modern commercial buildings located to the east of the site.

The City of Riverside has not established applicable standards for human annoyance from vibration. As such, thresholds for vibration annoyance established by Caltrans are shown in Table 14 (Caltrans 2013b). Based on the guidance in Table 17, the "strongly perceptible" vibration level of 0.9 ppv in/sec is used in this analysis as the threshold for a potentially significant vibration impact for human annoyance.

TABLE 17
VIBRATION ANNOYANCE THRESHOLDS

Average Human Response	ppv (in/sec)
Severe	2.0
Strongly perceptible	0.9
Distinctly perceptible	0.24
Barely perceptible	0.035

ppv: peak particle velocity; in/sec: inch(es) per second

Source: Caltrans 2013b.

Pile Driving. As stated above, construction of the proposed project could require pile-driving, which is generally a source of the most severe vibration, during construction of the underground storage tanks. Caltrans provides a conservative screening assessment for estimating vibration levels from pile driving (Caltrans 2013b). The method is conservative because it assumes a hard soil, which transmits vibration more than softer soils. The closest receptors to the proposed storage tanks, at a distance of approximately 120 feet, are the residences southwest of the project site. Assuming an impact pile driver rated at 80,000 foot-pounds, the vibration level 121 feet from pile driving would be 0.17 ppv in/sec. This value is less than the 0.3 ppv in/sec significance threshold for structural damage and the 0.9 ppv in/sec threshold for annoyance. Use of a pile driver rated up to 200,000 foot-pounds would also not exceed the 0.3 ppv in/sec significance threshold, but a pile driver that large would not be anticipated for the installation of the underground storage tanks proposed by this project. Therefore, the pile-driving vibration impact would be less than significant.

Other Construction Equipment. Conventional heavy construction equipment would be used for asphalt demolition, ground excavation, and export of excavated materials. Additionally, compactors would likely be used for subgrade compaction. Table 18 summarizes typical vibration levels measured during construction activities for various vibration-inducing pieces of equipment at a distance of 25 feet.

TABLE 18
VIBRATION LEVELS DURING CONSTRUCTION

Equipment	ppv at 25 ft (in/sec)
Vibratory roller	0.210
Large bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003
ppv: peak particle velocity; ft: feet; in/sec: inch(es) per second. Source: Caltrans 2013b.	

Table 19 shows the peak particle velocity levels (ppv) from vibration activities at the nearest sensitive receptor.

TABLE 19
STRUCTURAL DAMAGE CRITERA AT SENSITIVE USES

Equipment	Vibration Levels (ppv) at Residences to the South of the Project Site (ppv @ 70 ft)
Vibratory roller	0.045
Caisson Drill	0.019
Large bulldozer	0.019
Small bulldozer	0.001
Jackhammer	0.007
Loaded trucks	0.016

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

Structural Damage Threshold	**0.3**
Exceeds Threshold?	**No**
Annoyance Threshold	**0.9**
Exceeds Criteria?	**No**

ppv: peak particle velocity; Max: maximum; avg: average; ft: feet

Source: USEPA 1971 (Calculations can be found in Attachment B of the Noise and Vibration Analysis in Appendix I of this Initial Study).

Table 18 shows the vibration levels from various equipment would be below the structural damage threshold and the annoyance threshold at the nearest off-site structures. As such, vibration impacts during construction of the project would be less than significant.

As summarized above from the Noise and Vibration Analysis, the project would not result in or be exposed to significant groundborne vibration and groundborne noise levels. Impacts would be **less than significant** directly, indirectly, and cumulatively.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

13c. Response: ***(Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours and Figure N-9 – March ARB Noise Contour; Riverside County Airport Land Use Compatibility Plan (RCALUCP); AirNav Riverside Municipal Airport; and Noise and Vibration Analysis prepared by Psomas in May 2018 [included in Appendix I])***

No Impact. Per the General Plan 2025 Noise Element, Figure PS-6 – Airport Land Use Compatibility Zones and Influence Areas in the Public Safety Element, and the General Plan 2025 FPEIR, no private airstrips are found within the City that would expose people working or residing in the City to excessive noise levels. The nearest airport to the site is the Riverside Municipal Airport, a City-owned airport located approximately 2.8 miles north of the site. The site is not located within the vicinity of a private airstrip or the airport land use plan for the Riverside Municipal Airport and is not located within any of the airport noise contour areas identified in the Riverside County Airport Land Use Compatibility Plan (RCALUCP), as depicted on Figures N-8 and N-9 of the Noise Element of the General Plan 2025. While aircraft overflights may be audible at the project site, the proposed project would not expose people working at or visiting the project to excessive noise levels related to airport or aircraft noise. Therefore, **no impact** related to excessive noise levels from airports would occur directly, indirectly, and cumulatively on people who would reside or work in the project area.

14. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

14a. Response: ***(Source: General Plan 2025 FPEIR Table 5.12-B – General Plan Population and Employment Projections–2025 and Table 5.12-D - General Plan Housing Projections 2025; SCAG's 2016-2040 RTP/SCS and RTP/SCS Demographics and Growth Forecasts; Department of Finance (DOF) Table E-5 Population and Housing Estimates - 2011-2018; Economic Development Department (EDD) Monthly Labor Force Data for Cities and Census Designated Places (CDP); 2014-2021 Housing Element; SCAG Profile of the City of Riverside; and Riverside Municipal Code)***

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

Less Than Significant Impact. The California Department of Finance (DOF) estimates that, as of January 2018, the City of Riverside had a population of 325,860 residents and a housing stock of 100,515 dwelling units (DOF 2018). The City's labor force consisted of 153,700 persons, of which approximately 146,800 individuals were employed as of January 2018 (EDD 2018). Currently, no dwelling units or residents are present on the project site, but the plant nursery has five employees.

The proposed project involves the development of a gas station and convenience store and a fast food restaurant. The proposed project would not increase the City's housing stock or resident population. However, it would increase the City's job base. Based on the City's TDM Regulations (Chapter 19.880 of the RMC) that assume an average floor area of 500 square feet per employee for retail commercial uses, the 3,165-square-foot gas station and 3,290 square-feet of retail uses (adjacent to the fast food restaurant) would generate approximately 13 employees. Using an employment factor of 1 employee per 92 square feet of restaurant use, the 1,960-square-foot restaurant would generate 21 employees. A total of 34 jobs would potentially be generated by the proposed project, which are likely to be filled by the local labor pool. Also, these jobs would be less than 0.04 percent of the City's 2015 employment base of 136,185 jobs (SCAG 2017).

SCAG regional growth projections included in the 2016/2040 RTP/SCS estimate the City's employment base to include 200,500 jobs by 2040. The proposed project's employees would represent less than 0.03 percent of the City's projected 2040 employment base.

The Riverside General Plan 2025 is expected to accommodate an employment base of 865,341 to 1,177,625 jobs by 2025 within the City and its Sphere of Influence. The 34 employees of the project, or the net increase of 29 jobs in the City, would represent a negligible amount of the City's current and future employment base. Thus, the employment increase associated with the project would be within City and SCAG growth projections and would not induce substantial population growth. Increases in the employment from the proposed project are considered minimal when compared to the current employment base of the City of Riverside, the projected employment growth for the City, and the City's buildout estimates.

Construction workers at the site would be temporary, would be limited in number, would likely come from the local labor pool, and would not generate a large and steady demand for local goods or services. Once the proposed project is in operation, the on-site retail uses, existing adjacent commercial developments, and service companies located across Van Buren Boulevard and in other areas in the City of Riverside are expected to meet any increase in demand for goods and services from employees of the project and residents of the area.

Additionally, the proposed project is not expected to induce additional growth (i.e., spur new business development in the surrounding area) since the remainder of the parcel is already planned for future residential development and no other undeveloped parcels exist near the site. Also, the proposed project does not involve the extension of roads or other infrastructure to unserved areas, which could indirectly induce growth.

Impacts related to growth inducement would be **less than significant** directly, indirectly, and cumulatively.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

14b. Response: ***(Source: 2014-2021 Housing Element; Site Visit and Conceptual Site Plan)***

No Impact. The project site is currently a commercial plant nursery with no housing units on the site. The proposed project would not displace residents or households, necessitating the construction of replacement housing elsewhere, because the project site is currently used as a plant nursery. The project would create 34 new jobs, which would be minimal and would likely be filled by the local labor pool. The proposed project would not demolish, displace, or remove existing housing units near the site. Therefore, the proposed project would not require replacement housing and would have **no impact** on people or housing that may necessitate the need for replacement housing. **No impact** on existing people or housing either directly, indirectly, or cumulatively would result.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐

15a. Response: ***(Source: General Plan 2025 FPEIR Table 5.13-B – Fire Station Locations and RMC Title 16 – Buildings and Construction and Chapter 16.52 – Development Fees for Fire Stations)***

Less Than Significant Impact. The proposed commercial development would create a demand for fire protection and emergency services that would be provided by the Riverside Fire Department, which is currently staffed by 211 full-time firefighters (2018c). The nearest fire station to the site is the Arlington Fire Station #2 located at 9449 Andrew Street, approximately 0.65-mile northwest of the site. The City has 13 other fire stations that may also serve the project in the event of a fire or other emergency.

Because the project site is now used as a plant nursery, few service calls are made to the site. The proposed commercial uses could increase service calls by the Riverside Fire Department, as they would require fire protection services, including administrative tasks associated with approval and construction of the proposed project (e.g., building plan check) and responses to fire service and emergency calls once the project is operational. However, the proposed project is not anticipated to generate the need for new firefighters and other Fire Department personnel.

Design and construction of the project would comply with the California Building Code and California Fire Code standards, as adopted by the City in Chapter 16.32 of the RMC. This includes standards and requirements for smoke and carbon monoxide alarms, automatic fire sprinkler systems, fire escapes, fire exits, emergency vehicle access roads, fire extinguishers, and fire hydrants, among other requirements. The project would also be subject to various safety requirements for operation of the gas pumps and underground storage tanks. The site and building plans for the proposed project shall be reviewed by the Fire Department during the Development Review process and will be subject to additional review during the Plan Check process. project compliance with City fire protection and safety requirements would reduce the potential for fire and the demand for fire protection services.

The Developer would pay development fees for fire stations, in accordance with Chapter 16.52 of the RMC. The collected fees are specifically used for the purchase of land and the construction of fire stations and the acquisition of equipment and furnishings to equip the City's fire stations. This ensures that adequate fire facilities and services are available from the Riverside Fire Department. As such, the proposed project's increase in demand for fire protection services would not require the construction of new or alteration of existing fire protection facilities to maintain an adequate level of fire protection service to the project area. Therefore, no physical impacts associated with the provision of fire protection services to the project would occur. The City Fire Department also implements a number of programs in accordance with General Plan 2025 objectives and policies related to the promotion of fire safety and prevention of fire hazards, including Objective PS-6 and Policies PS-6.1 through PS-6.11 and PS9-8, which relate to Citywide efforts for the provision of fire protection services. The site is designated for urban land uses and is served by urban levels of public facilities and services, consistent with Policies LU-9.3 and LU-9.4. Citywide programs and project compliance with the City's building codes and Fire Department regulations would result in a **less than significant impact** related to the need for additional fire facilities either directly, indirectly, or cumulatively.

b. Police protection?	☐	☐	☒	☐

15b. Response: ***(Source: General Plan 2025 and Public Safety Element Figure PS-8 – Neighborhood Policing Centers and General Plan 2025 FPEIR Figure 5.13-2 – Policing Centers)***

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

Less Than Significant Impact. The proposed project would be served by the Riverside Police Department for law enforcement and police protection services. The Riverside Police Department has approximately 130 sworn officers, 24 Sergeants, 6 Lieutenant Watch Commanders, 1 Executive Lieutenant, 1 Traffic Lieutenant, and a civilian support staff (Riverside 2018d). Officers are assigned to one of four Neighborhood Policing Centers (NPC) and are accountable for their assigned area. The site is within the Central Policing Center, which is served by the Lincoln Station approximately 1.7 miles northeast of the site. The Galleria and Magnolia Stations that serve the West Policing Center are located nearer to the site, approximately 1.2 and 1.5 miles west of the site, respectively.

Because the project site is currently a plant nursery, few service calls are made to the site. Anticipated crime and safety issues during construction of the proposed project include theft of building materials and construction equipment, malicious mischief, graffiti, and general vandalism. During operation, the proposed project could create the typical range of police service calls that similar commercial uses in the City experience. The primary types of crimes in non-residential areas are property crimes (e.g., burglary, larceny, theft/auto theft, arson, shoplifting, vandalism). Employees, patrons, and other individuals that would come to the project site would have to comply with the regulations in the RMC and the California Penal Code, as monitored and enforced by the Riverside Police Department.

Although the project is not anticipated to generate the need for new sworn officers, the project would require police protection services, including administrative tasks associated with approval and construction of the proposed project (e.g., building plan check) and response to police service calls once the proposed commercial uses are in operation. This increase in demand for police protection services would not require construction of new or alteration of existing Police Department facilities to maintain an adequate level of service to the project site and the City.

Therefore, no physical impacts associated with the provision of police protection services would occur, and no mitigation is required.

With the implementation of CPTED principles by the project and other developments; Police Department reviews of developments (consistent with General Plan Policies PS-8.3 and PS-8.4); ongoing Police Department programs that serve to implement Objective PS-7 and Policies PS-7.1 through PS-7.7, Objective PS-8 and Policies PS-8.1 and PS-8.2, which relate to Citywide efforts for crime prevention and public safety; and project compliance with existing codes and standards and current Police Department practices, there would be a **less than significant impact** on the demand for additional police facilities or services either directly, indirectly, or cumulatively.

c. Schools?	☐	☐	☒	☐

15c. Response: ***(Source: General Plan 2025 FPEIR Figure 5.13-2 – RUSD Boundaries; RUSD Boundary Maps and Long Range Facilities Master Plan; and RMC Chapter 16.56 – School Development Fee)***

Less Than Significant Impact. The site is within the service boundaries of the Riverside Unified School District (RUSD) and is served by Harrison Elementary School, at 2901 Harrison Street; Chemawa Middle School, at 8830 Magnolia Avenue; and Arlington High School, at 2951 Jackson Street. The RUSD has identified a number of renovation and expansion plans for existing schools in their Long-Range Facilities Master Plan, which includes the provision of permanent capacities for 750 students at Harrison Elementary School, 900 students at Chemawa Middle School, and 2,500 students at Arlington High School. The proposed project, which involves operation of a gas station, convenience store, and retail/restaurant, would not involve the construction of new housing and would not generate new students in the area. It is expected that employees would come from the local labor pool.

The Leroy Greene School Facilities Act of 1998 (Sections 17070 et seq. of the California Education Code) provides a comprehensive school facilities financing and reform program, including the collection of school development fees from new development to assist individual school districts fund new school construction and reconstruction/modernization needs. Prior to the issuance of the building permit, the Developer would comply with the Leroy Green School Facilities Act by paying the required school development fee to the RUSD, in accordance with Chapter 16.56 of the RMC. The school development fees would be used to fund school facilities needed by new developments within the RUSD service area.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Therefore, the project would have a **less than significant impact** related to the demand for school facilities or services either directly, indirectly, or cumulatively.				
d. Parks?	☐	☐	☒	☐

15d. Response: ***(Source: General Plan 2025 Land Use and Urban Design Element, Parks and Recreation Element, Figure PR-1 – Parks, Open Spaces and Trails, and Table PR-1 – Park and Recreation Facilities; Park and Recreation Master Plan Update; General Plan 2025 FPEIR Section 5.14 – Recreation; Bicycle Master Plan Update: Addendum; and RMC Chapters 16.44, 16.60 and 16.76)***

Less Than Significant Impact. There are 51 parks at various locations throughout the City which serve the recreational needs of residents, employees, and visitors. The nearest park to the site is Harrison Park, at 2851 Harrison Street, located 0.3 mile southwest of the site along Lincoln Avenue and Harrison Street. Other nearby public parks and recreational facilities include Arlington Park, Arlington Heights Sports Complex, Don Derr Park, and California Citrus State Historic Park.

The project would consist of a gas station and convenience store and a fast food restaurant. No on-site recreational facilities are proposed or required by the City for these commercial uses. While the proposed project would increase the number of jobs in the City, it is expected that future employees would come from the local labor pool and would not increase the demand for City parks and other public and regional parks. A significant increase in the use of public park facilities would not occur at a level that would require the need for new or physically altered facilities.

No trails, staging areas, or trail connections are present near the project site. Figure LU-6 – Tying the Connections of the General Plan and the Bicycle Master Plan Update: Addendum show proposed Class 2 bike lanes on Lincoln Avenue and Van Buren Boulevard along the site boundaries. The widening of Van Buren Boulevard and Lincoln Avenue would allow future striping of Class 2 bike lanes along the site boundaries. Thus, the proposed project would facilitate use of future bike lanes in the area.

Prior to the issuance of the building permit, the Developer would comply with Chapters 16.44 and 16.60 of the RMC by paying the applicable Park Development Impact Fees for use in the acquisition, development, or expansion of regional and local parks in the City. The Developer would also comply with Chapter 16.76 of the RMC by paying the applicable Trail Development Fee for use in the acquisition and development of trails in the City. The project would have **less than significant impacts** related to the demand for additional park facilities or services either directly, indirectly, or cumulatively.

d. Other public facilities?	☐	☐	☒	☐

15e. Response: ***(Source: General Plan 2025 Figure LU-8 – Community Facilities; General Plan 2025 FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, and Table 5.13-H – Riverside Public Library Service Standards; and Riverside Public Library website)***

Less Than Significant Impact. The City has eight libraries, with a collection of approximately 425,000 books and other library materials, 400 computers, and several community meeting rooms. The City also has nine community centers that host recreational programs, classes, activities, and sports and three senior centers. The project would not generate a direct demand for libraries, community centers, or other public facilities and would not create a need for new or physically altered facilities.

Payment of the library parcel tax by property owners, as approved under Measure C, allows the City to provide adequate funding for library services. In addition, the City has community service programs and library practices that implement General Plan 2025 Objective PF-10 and Policies PF-10.1 through PF-10.4. Citywide efforts for the provision of community centers and other public services and facilities and property owner payment of the library parcel tax would prevent any impact on public facilities or services. City services required by the project, as they relate to development review, plan check, and site inspection services, would be paid for by the Developer, in accordance with City adopted application and processing fees. **Less than significant impacts** would occur either directly, indirectly, or cumulatively with the project.

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

16a. Response: ***(Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, and Figure CCM-6 – Master Plan of Trails and Bikeways; Park and Recreation Master Plan Update; General Plan 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types and Table 5.14-D – Inventory of Existing Community Centers; RMC Chapters 16.44, 16.60 and 16.76; and Bicycle Master Plan Update: Addendum)***

Less Than Significant Impact. Nearby parks include Harrison Park (located 0.3 mile southwest of the site), Arlington Park, Arlington Heights Sports Complex, Don Derr Park, and California Citrus State Historic Park. Employees of the proposed commercial uses would not generate a direct demand for parks and recreational facilities, as discussed above under Threshold 15d in Section 14, Public Services. Therefore, the proposed project would not cause or accelerate the physical deterioration of a park facility. The project would also pay applicable Park Development Impact Fees and Trails Development Fee to the City of Riverside Parks, Recreation and Community Services Department for use in the acquisition, development or expansion of regional and local parks and trails in the City. Impact on parks and recreational facilities would be **less than significant** directly, indirectly, or cumulatively.

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

16b. Response: ***(Source: Conceptual Site Plan and RMC Chapters 16.44, 16.60 and 16.76)***

Less Than Significant Impact. The project does not include the construction of residential units that may generate a demand for recreational facilities. Also, the project would not include the provision of recreational facilities on site. Widening of Van Buren Boulevard and Lincoln Avenue as part of proposed roadway improvements along the site boundaries would allow future striping of Class 2 bike lanes. The project would also pay applicable Park Development Impact Fees to the City, as required under Chapters 16.60, 16.44 and 16.76 of the RMC, to improve the City's parks and recreational facilities. There would be a **less than significant impact** directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project result in:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☒	☐	☐

17a. Response: ***(Source: General Plan 2025 Circulation and Community Mobility Element Figure CCM-4 – Master Plan of Roadways; General Plan 2025 FPEIR Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025; and Traffic Impact Analysis prepared by Ganddini Group Inc. in April 2019 [included in Appendix J])***

Less Than Significant Impact. A Traffic Impact Analysis was prepared to determine the impacts of the project on traffic operations, access, circulation, safety, and alternative transportation (Ganddini 2019; see Appendix J of this Initial Study). Following is a summary of the analysis of potential impacts to roadway intersections in the study area resulting from the proposed project. Impacts related to safety are discussed below under Threshold 17d, and alternative transportation (e.g., transit, pedestrian, and bicycle paths) is discussed at end of this threshold discussion, under the heading "Transit, Bicycle and Pedestrian Facilities".

Significance Criteria

Performance standards and thresholds of significance are identified to use for assessment of potential transportation impacts associated with development projects within the City. Specifically, given the location of the project in proximity to SR-91, criteria and standards from the California Department of Transportation (Caltrans) are also identified.

Performance Standards

City of Riverside

Per Appendix F of the City of Riverside Traffic Impact Analysis Preparation Guidelines, the City of Riverside allows LOS D to be used as the maximum acceptable threshold for the study intersections and roadways of collector or higher classification. LOS C is to be maintained on all street intersections.

Per the City of Riverside General Plan Circulation Element Policy CCM-2.3, a LOS D or better is to be maintained on arterial streets wherever possible. At key locations, such as City arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-base standard.

California Department of Transportation

The California Department of Transportation endeavors to maintain a target LOS at the transition between LOS C and LOS D on State highway facilities; however, Caltrans acknowledges this may not always be feasible and recommends consultation with the California Department of Transportation to determine the appropriate target LOS. For consistency with local requirements, this analysis defines LOS D as the minimum acceptable LOS for State Highway facilities.

Thresholds of Significance

City of Riverside

According to Appendix F of the City of Riverside Traffic Impact Analysis Preparation Guidelines, a proposed project is considered to have a significant impact at a study intersection when the addition of project-related trips causes either peak-hour LOS to degrade from what the City considers acceptable levels (LOS A through D) to unacceptable levels (LOS E to F), or if delay in seconds during peak hours increases by the following thresholds: ten seconds for LOS A or B, eight seconds for LOS C, five seconds for LOS D, two seconds for LOS E, and one second for LOS F.

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

California Department of Transportation

Based on the performance standards established by California Department of Transportation, a significant transportation impact would occur if:

- The addition of project generated trips is forecast to cause the performance of an intersection to deteriorate from acceptable LOS D (or better) to unacceptable LOS (LOS E or F); or
- The addition of project generated trips is forecast to cause the performance of an intersection operating at unacceptable LOS (LOS E or F) in the baseline condition.

Regional access to the project site is provided by SR-91, with on- and off-ramps at Van Buren Boulevard located approximately 0.5 mile to the northwest of the site. Van Buren Boulevard provides direct local access to the project site and runs along the northeastern boundary of the site. Lincoln Avenue also provides direct access along the southwestern boundary.

Following is a description of local roadways addressed in the Traffic Impact Analysis.

- Van Buren Boulevard is a north-south four - to seven-lane divided roadway that is classified as a Parkway on the City of Riverside General Plan Circulation Element. It is a four-lane divided roadway near the site and currently carries approximately 29,100 to 37,200 vehicles per day.
- Lincoln Avenue is an east-west two -lane undivided roadway to a four lane-divided roadway that is classified as an 88-foot Arterial east of Van Buren Boulevard and is not classified west of Van Buren Boulevard on the City of Riverside General Plan Circulation Element. It is a two-lane undivided roadway near the site and currently carries approximately 3,500 to 7,200 vehicles per day.
- Indiana Avenue is an east-west two -lane undivided roadway to a four-lane divided roadway that is classified as an 88-foot Arterial on the City of Riverside General Plan Circulation Element. It currently carries approximately 14,700 to 25,700 vehicles per day and runs parallel to SR-91 northwest of the site.
- Rudicill Street is an east-west two -lane undivided roadway and is not classified on the City of Riverside General Plan Circulation Element. It currently carries approximately 400 to 3,100 vehicles per day and runs parallel to SR-91 northwest of the site.

Exhibit 14 shows the existing traffic controls and geometrics for roads and intersections near the site.

Existing AM and PM peak-hour traffic volumes were compiled based on turning movement counts collected on Wednesday, April 18, 2018; 24-hour, two-way average daily traffic (ADT) counts were collected on the same day. Existing traffic volumes are depicted on Exhibit 15. Existing AM and PM peak hour turning movement volumes are shown on Exhibits 16 and 17.

Construction Traffic

Construction activities at the project site, which would last approximately 8 months, and would include heavy truck trips, construction equipment trips, and construction crew vehicle trips that would add to existing traffic volumes in the project area. Truck trips would be generated by demolition activities (e.g., removal of boxed plants, trailer/retail sales office, sheds, and asphalt paving) that would occur for 10 days, during site preparation for approximately 2 days, grading and excavation activities over 6 days, building construction for 135 days, paving over 3 days, and other construction phases (e.g., utility installation and interior finishes).

Construction trucks, construction equipment, and construction vehicles would access the project site from SR-91 via Van Buren Boulevard. Trucks would head southeast from the freeway on Van Buren Boulevard to reach the site. Trucks would exit the project site and would head northwest on Van Buren Boulevard to return to SR-91. Truck hauls and delivery trips

would occur intermittently throughout the day and would not be concentrated during peak hours. Construction workers are expected to be on site prior to the AM peak hour and would leave prior to the start of the PM peak hour. Construction staging and construction employee parking would occur at the project site. Construction traffic using SR-91, major arterials, and local streets would contribute to traffic volumes on these roadways but would not be a substantial percentage of the daily traffic volumes. They would also be temporary in nature.

The proposed roadway improvements on Van Buren Boulevard and Lincoln Avenue and utility line connections would lead to temporary obstructions of traffic flow on these streets. As required by the City, at least one lane of travel would remain open and available at all times, as feasible, in accordance with the Greenbook. The City also requires submission and implementation of a construction Traffic Control Plan or compliance with the Work Area Traffic Control Handbook (WATCH Manual) or Manual on Uniform Traffic Control Devices (MUTCD) to facilitate the movement of traffic through construction areas and to minimize potential disruptions to vehicle traffic along Van Buren Boulevard, Lincoln Avenue and surrounding streets. Therefore, construction-related traffic would not significantly impact roadway operations and would result in a less than significant impact.

Operational Traffic

The proposed commercial uses on the site would generate new vehicle trips to and from the site. Table 20 provides the trip generation estimates based on the Institute of Transportation Engineers Trip Generation Manual (10th Edition). As many as 2,737 new ADT would be generated by the project, with 181 trips during the morning (AM) peak hours and 213 trips during the afternoon/evening (PM) peak hours. It should be noted that vehicle trips from the existing plant nursery have not been discounted, and no modal split reduction[2] was applied for the proposed project. While trips to the fast food restaurant may also use the gasoline service station and vice versa, the trip generation estimate has not been reduced to account for internal trip interaction between the proposed commercial uses. However, a portion of the project trips for each commercial use is expected to consist of trips that are currently on the roadway system and would only pass by for gasoline, food, or other merchandise sold at the project. Thus, the project-generated trips have been reduced by 25 percent due to pass-by trips, consistent with City guidelines.

[2] Modal split signifies the proportion of traffic generated by a project that would use any of the transportation modes, namely buses, cars, bicycles, motorcycles, trains, carpools, etc.

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

TABLE 20
PROJECT TRIP GENERATION ESTIMATES

Land Use Trip Rate	Size	AM PEAK HOUR			PM Peak Hour			Daily Trip Rate
		%In	%Out	Total	%In	%Out	Total	
Fast food Restaurant with Drive-thru	Per tsf	20.50	19.69	40.19	16.99	15.68	32.67	470.95
Commercial Retail	Per tsf	0.58	0.36	0.94	1.83	1.98	3.81	37.75
Gasoline Service station with convenience market	Per fueling pump	6.36	6.11	12.47	7.13	6.86	13.99	205.36
Trip Generation	**Size**	**In**	**Out**	**Total**	**In**	**Out**	**Total**	**Daily Trips**
Fast food Restaurant with Drive-thru	2.235 tsf	46	44	90	38	35	73	1,053
Commercial Retail	3.500 tsf	2	1	3	22	24	46	132
Gasoline Service station with convenience market	12 pumps	76	73	149	86	82	168	2,464
Gross Total		124	118	242	146	141	287	3,649
Passby Trip Reduction		**In**	**Out**	**Total**	**In**	**Out**	**Total**	**Daily Trips**
Fast food Restaurant with Drive-thru (25%)		-12	-11	-23	-10	-9	-19	-263
Commercial Retail (25%)		-1	0	-1	-6	-6	-12	-33
Gasoline Service station with convenience market (25%)		-19	-18	-37	-22	-21	-43	-616
Project Trips Generated		**92**	**89**	**181**	**108**	**105**	**213**	**2,737**

tsf – thousand square feet
Source: Ganddani 2019.

The City has required the preparation of a traffic impact analysis to determine impacts on nearby roadway intersections, as contained in the City-approved scoping agreement (included in Appendix B of the Traffic Impact Analysis). The Traffic Impact Analysis included the following intersections:

- Van Buren Boulevard at SR-91 Freeway westbound ramps (signalized)
- Van Buren Boulevard at Indiana Avenue (signalized)
- Van Buren Boulevard at Rudicill Street (signalized)
- Van Buren Boulevard at Project Access (unsignalized)
- Van Buren Boulevard at Lincoln Avenue (signalized)
- Lincoln Avenue at Project Access (unsignalized)

The following traffic scenarios were analyzed:

- Existing (2018 without Project)
- Existing Plus Project
- Opening Year (2020 without Project)
- Opening Year Plus Project
- Buildout Year (2025 without Project)
- Buildout Year Plus Project

Existing Conditions

The existing intersection levels of service (LOS) at study area intersections was calculated based on traffic turning movement counts in April 2018 and the methodology in the Highway Capacity Manual. The City of Riverside sets the maximum allowable LOS at LOS D for intersections. The intersections of Van Buren Boulevard with the SR-91 freeway ramps, Indiana Avenue, Rudicill Street, and Lincoln Avenue currently operate at Levels of Service (LOS) C or better during the AM and PM peak hours.

Project Traffic Distribution

The project-generated trips were distributed to the roadway network serving the site based on existing distribution of traffic volumes for existing developments near the site and other traffic patterns in the area. The inbound pattern shows 45 percent of trips will come into the site on Van Buren Boulevard, while 55 percent would enter through Lincoln Avenue (see Exhibit 18). The outbound pattern shows 10 percent exiting on Van Buren Boulevard to go southeasterly; and 90 percent would exit on Lincoln Avenue, with 20 percent going northeast on Lincoln Avenue, 20 percent going southwest on Lincoln Avenue, 5 percent going southeast on Van Buren Boulevard, and 45 percent going northwest on Van Buren Boulevard (see Exhibit 19).

Existing Plus Project Conditions

Exhibit 20 shows the traffic volumes on roadway intersections with the addition of project trips to existing volumes, and Table 21 shows the delay and LOS at the study intersections with and without the project.

TABLE 21
EXISTING CONDITION INTERSECTION DELAY AND LEVEL OF SERVICE WITH AND WITHOUT THE PROJECT

Intersection	Traffic Control	Existing Without Project Delay (sec)/LOS[a]		Existing With Project Delay (sec)/LOS[a]		Significant Impact
		AM	PM	AM	PM	
Van Buren Boulevard						
1. SR-91 Freeway WB ramps	TS	32.6/C	22.0/C	33.3/C	22.4/C	No
2. Indiana Avenue	TS	31.4/C	34.0/C	32.0/C	34.6/C	No
3. Rudicill Street	TS	8.8/A	22.5/C	9.0/A	24.79/C	No
4. Project Access	CSS	--	--	11.4/B	15.9/C	No
5. Lincoln Avenue	TS	22.1/C	18.1/B	24.8/C	20.8/C	No
Lincoln Avenue						
6. Project Access	CSS	--	--	13.0/B	12.5/B	No

AM – morning peak hour; PM- afternoon/evening peak hour; TS – Traffic Signal; CSS – cross street stop

Source: Ganddini 2019

As shown, all intersections would operate at an acceptable LOS (i.e., LOS D or better). The proposed site driveways would also operate at acceptable LOS (LOS A-C during the AM and PM peak hours). Impacts to performance of the circulation system under the Existing With Project condition would be less than significant.

Opening Year (2020) Conditions

With project operation anticipated in 2020, the Opening Year condition assumes an increase in existing traffic volumes by 2.0 percent per year, along with additional traffic from other developments proposed in the study area. The Opening Year without Project traffic volumes is shown on Figure 32 of the Traffic Impact Analysis included in Appendix J, and the

Opening Year with Project traffic volumes is shown on Figure 33 of the Traffic Impact Analysis. Table 22 below shows the delay and LOS at the study intersections under the Opening Year with and without the project scenarios.

TABLE 22
OPENING YEAR (2020) INTERSECTION DELAY AND LEVEL OF SERVICE WITH AND WITHOUT THE PROJECT

Intersection	Traffic Control	Opening Year Without Project Delay (sec)/LOS[a]		Opening Year With Project Delay (sec)/LOS[a]		Significant Impact
		AM	PM	AM	PM	
Van Buren Boulevard						
1. SR-91 Freeway WB ramps	TS	40.8/D	25.2/C	42.1/D	25.8/C	No
2. Indiana Avenue	TS	34.9/C	37.5/C	35.7/D	38.4/D	No
3. Rudicill Street	TS	9.0/A	45.8/D	9.1/A	49.6/D	No
4. Project Access	CSS	--	--	11.6/B	16.6/C	No
5. Lincoln Avenue	TS	25.7/C	19.3/B	29.8/C	23.0/C	No
Lincoln Avenue						
6. Project Access	CSS	--	--	14.1/B	13.3/B	No

AM – morning peak hour; PM- afternoon/evening peak hour; TS – Traffic Signal; CSS – cross street stop
Source: Ganddini 2019

As shown, all roadway intersections would operate at LOS D or better under the Opening Year (2020) without Project and with Project scenarios. Also, the increase in delays during the AM and PM peak hours would range from 0.5 to 4.1 seconds and would not exceed the City's thresholds, as noted above. The proposed site driveways would also operate at acceptable LOS (LOS B/C during the AM and PM peak hours). In addition, the project would maintain LOS D operations on Van Buren Boulevard, consistent with Riverside General Plan Policies CCM-2.3 and CCM-2.4. Impacts related to the performance of the circulation system under the Opening Year With Project condition would be less than significant.

Buildout Year (2025) Conditions

The Buildout Year condition is provided because the proposed project requires a General Plan Amendment. The Buildout Year, anticipated in 2025, assumes buildout of the Riverside General Plan and assumes an increase in existing traffic volumes by 2.0 percent per year, along with additional traffic from other developments proposed in the study area. The Buildout Year without Project traffic volumes is shown on Figure 38 of the Traffic Impact Analysis included in Appendix J, and the Opening Year with Project traffic volumes is shown on Figure 39 of the Traffic Impact Analysis. Table 23 below shows the delay and LOS at the study intersections under the Buildout Year with and without the project scenarios.

TABLE 23
BUILDOUT YEAR (2025) INTERSECTION DELAY AND LEVEL OF SERVICE WITH AND WITHOUT THE PROJECT

Intersection	Traffic Control	Buildout Year Without Project Delay (sec)/LOS[a]		Buildout Year With Project Delay (sec)/LOS[a]		Significant Impact
		AM	PM	AM	PM	
Van Buren Boulevard						
1. SR-91 Freeway WB ramps	TS	76.4/E	33.5/C	79.8/E	34.6/C	Yes
- With Improvements	TS			33.4/C	32.8/C	No
2. Indiana Avenue	TS	45.2/D	49.2/D	46.4/D	51.8/D	No
3. Rudicill Street	TS	9.1/A	85.0/F	9.2/A	94.3/F	Yes
- With Improvements	TS	9.4/A	18.5/B	9.7/A	20.6/C	No
4. Project Access	CSS	--	--	12.1/B	18.3/C	No
5. Lincoln Avenue	TS	34.4/C	21.5/C	38.3/D	26.4/C	No
Lincoln Avenue						
6. Project Access	CSS	--	--	14.7/B	13.7/B	No

AM – morning peak hour; PM- afternoon/evening peak hour; TS – Traffic Signal; CSS – cross street stop
Source: Ganddini 2019

As shown in Table 20 above, the study intersections are forecast to operate at LOS D or better during the peak hours under the Buildout Year (2025) without Project and with Project scenarios with the exception of the following intersection which would operate at an unacceptable level LOS during the PM peak hour:

- Van Buren Boulevard at Rudicill

However, as shown in Table 20 above, with improvements (see MM TRA-1 below), this intersection is forecast to operate within an acceptable LOS (D or better) during the peak hours for Buildout Year (2025) with Project conditions. Therefore, with implementation of the improvements as proposed in MM TRA-1, impacts to Van Buren Boulevard at Rudicill intersection would be reduced to an acceptable LOS (D or better).

As shown in Table 23 above, the following intersection is operating at LOS E during the AM Peak.

- Van Buren Boulevard at SR-91 WB Ramps

While a LOS E is allowable at freeway interchanges under the City of Riverside LOS criteria, the LOS at this intersection meets the significant impact criteria for a LOS E intersection which states is triggered by an increase in peak hour delay by 2.0 seconds. Therefore, with improvements (see MM TRA-2 below), this intersection is forecast to operate within an acceptable LOS (D or better) during the peak hours for Buildout Year (2025) with Project conditions. Therefore, with implementation of the improvements as proposed in MM TRA-2, impacts to the Van Buren Boulevard at SR-91 WB Ramps intersection would be reduced to an acceptable LOS (D or better). In addition, the City participates in the Western Riverside County Transportation Uniform Mitigation Fee (TUMF) program that collects funds from new development for regional transportation system improvements needed to serve future growth. Prior to the issuance of the building permit, the Developer would comply with Chapter 16.68 of the RMC by paying the applicable TUMF to the City. These fees are used for the improvement of major roadways and freeways in the Western Riverside region. In accordance with Chapter 16.64 of the RMC, the Developer would also pay the applicable traffic signal and railroad signal mitigation fees and transportation impact fees. These fees are used for the installation of traffic signals and railroad signals and for the construction of improvements to increase or improve the capacities of City streets. With payment of applicable fees, and implementation of

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

MM TRA-1 and MM TRA-2, the increase in traffic delays due to the project in relation to the existing traffic load and capacity of the street system would be **less than significant after mitigation** directly, indirectly, or cumulatively.

MM TRA-1 Prior to issuance of Certificate of Occupancy, the Project Applicant shall provide 14.2% fair share contribution toward improvements at the Van Buren Boulevard at Rudicill Street intersection that is satisfactory to the City Traffic Engineer. The improvements will include restriping the eastbound approach to consist of one left turn lane and one shared through/right turn lane.

MM TRA-2 Prior to issuance of Certificate of Occupancy, the Project Applicant shall provide a 5.7% fair share contribution toward improvements at the Van Buren Boulevard at SR-91 Westbound Ramps intersection that is satisfactory to the City Traffic Engineer. The improvements will include installing southbound right turn overlap traffic signal phasing.

Transit, Bicycle and Pedestrian Facilities

Metrolink trains run along the railroad tracks southeast and roughly parallel to SR-91 (0.4-mile northwest of the site), but no stops are near the site. RTA Buses 10 and 27 currently travel on Van Buren Boulevard; and Bus 10 travels on Lincoln Avenue, east of the site. The nearest bus stop is located across Van Buren Boulevard beside Lincoln Plaza, with other bus stops on Lincoln Avenue and Van Buren Boulevard southeast of the site. No hiking trails, staging areas, or trail access points are located near the site; but Class 2 bike lanes are proposed on Van Buren Boulevard and Lincoln Avenue (Figure LU-6 – Tying the Connections in the Land Use and Urban Design Element of the General Plan and Figure 6-1 – City of Riverside Existing and Proposed Bikeways in the City's Bicycle Master Plan Update: Addendum). Sidewalks and crosswalks near the site are shown on Exhibit 21.

The project, as designed, does not create conflicts with adopted policies, plans, programs or ordinances supporting alternative transportation since no train stops, hiking trails, staging areas, or trail access points are located near the site. Existing bus routes and bus stops would also not be affected by the project. Van Buren Boulevard and Lincoln Avenue would be widened and would allow future striping of Class 2 bike lanes to support and encourage bicycle travel. Sidewalks that would be constructed along Van Buren Boulevard and Lincoln Avenue would improve pedestrian safety and walking routes to Arlington High School and Harrison Elementary School. Pedestrians may also use the sidewalks that would be constructed along the site to walk to Lincoln Plaza and nearby bus stops. These project features are consistent with Riverside General Plan objectives and policies related to alternative transportation (including Objective CCM-10 and Policies CCM-8.2, CCM-10.6, CCM-10.11, CCM-10.12, ED-4.6, PS-5.1, OS-1.6, AQ-1.20, and AQ-8.34). The project would also provide on-site vehicle parking in excess of City standards (consistent with Policies CCM-13.1 and CCM-13.3) and on-site bicycle racks (consistent with Policy OS-8.12). The proposed street improvements and on-site vehicle circulation and parking were designed in a comprehensive fashion, consistent with Policies CCM-2.9 and CCM-3.2.

Thus, the project would encourage and promote walking or biking to the project and nearby schools and shopping center. As such, the project will have **less than significant impacts with mitigation** directly, indirectly, or cumulatively on adopted policies, plans, programs or ordinances supporting alternative transportation.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

17b. Response: ***(Source: Traffic Impact Analysis prepared by Ganddini Group Inc. in April 2019 [included in Appendix J)***

CEQA Guidelines Section 15064.3 contains several subdivisions pertaining to determining the significance of transportation impacts. Specifically, CEQA Guidelines Section 15064.3, subdivision (b) states that if the vehicle miles traveled (VMT) generated by a project exceed an applicable threshold of significance, it may indicate a significant impact. The guidelines also state that projects, which decrease VMT in the project area when compared to existing conditions should be presumed to have a less than significant impact. Methods for evaluating VMT for roadway capacity projects continue to evolve at the discretion of the lead agency, as recognized by the CEQA Guidelines and the City of Riverside has not adopted a method for evaluating VMT. CEQA Guidelines Section (b)(3) indicates that in the absence of available models or methods to evaluate

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

VMT, a project's VMT may be evaluated qualitatively, including such factors as the availability of transit and a discussion of construction traffic.

As discussed above in Threshold 17a above, a traffic impact analysis (Ganddini 2019) was prepared for the proposed project and as shown in Table 19, the project would result in less than significant traffic impacts for the Existing Plus Project scenario and the Opening Year (2020) With Project scenario, while the Buildout Year (2025) With Project scenario would be mitigated to less than significant with implementation of MM TRA-1 and MM TRA-2. In addition, a discussion of transit facilities and the project's consistency with adopted policies, plans, programs or ordinances that support transit is provided in Threshold 17a. Therefore, the project is not anticipated to exceed thresholds for either trips or vehicle miles traveled. Less than significant impacts would occur.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

17c. Response: ***(Source: General Plan 2015 Circulation and Mobility Element; Conceptual Site Plan; and Traffic Impact Analysis prepared by Ganddini in April 2019 [included in Appendix J])***

Less Than Significant Impact. Consistent with General Plan Policies CCM-2.1 and PS-4.12, the project would widen Van Buren Boulevard to its ultimate right-of-way of 120 feet. The project would also provide right-turn-in/right-turn-out access at the proposed driveway on Van Buren Boulevard and full access at the proposed driveway on Lincoln Avenue. Sight distance at the access driveways would comply with City standards. Section 13.06.010 of the RMC prohibits hedges, shrubs, trees, landscaping, earth mounds, or boulders more than 30 inches in height or the limbs of trees less than 84 inches in height to be located between the street and the setback lines of a lot if these landscaping features would obscure or impair the view of intersecting or entering traffic from a street of passing motorists and pedestrians or impair the view of street signs, traffic signs, or other control devices and signs. All construction work and improvements on Van Buren Boulevard and Lincoln Avenue shall be made in accordance with the City's roadway standards and regulations, including Title 13 of the RMC, which requires an encroachment permit from the City and sets regulations for the repair of sidewalks, curbs, and gutters; excavations and utility locations; and parkway landscaping, among others. The circulation recommendations of the Traffic Impact Analysis are shown on Exhibit 22.

As a condition of approval, internal drive aisles, driveways, and roadway improvements would comply with the City's standards for emergency vehicle access, turning radii, corner visibility, parking, lane width, traffic signing, and other roadway design requirements, subject to approval by the City's Fire Department and Department of Public Works. Specifically, improvements on Van Buren Boulevard and Lincoln Avenue and the proposed drive aisles and driveways would be constructed in accordance with the City's roadway design standards and Section 18.210.030 of the RMC. With compliance with City standards, and based on the analysis presented above, the proposed project would have a **less than significant impact** related to increasing hazards through design or incompatible uses either directly, indirectly or cumulatively.

d. Result in inadequate emergency access?	☐	☐	☒	☐

17d. Response: ***(Source: General Plan 2025 Public Safety Element Figure PS 8.1 – Evacuation Routes; Riverside Municipal Code; City's Fire Code; and Traffic Impact Analysis prepared by Ganddini in April 2019 [included in Appendix J])***

Less Than Significant Impact. Based on review of Figure PS-8.1 – Evacuation Routes in the Public Safety Element of the General Plan, Van Buren Boulevard is a designated evacuation route.

During the construction of roadway improvements and utility connections on Van Buren Boulevard and Lincoln Avenue, the project has the potential to obstruct lanes of travel and may temporarily impact emergency access and evacuation. However, the project would be required to provide at least one lane of travel open and available at all times, in accordance with the Greenbook, as required by the City. Also, compliance with the WATCH or MUTCD Manual or preparation of a Traffic Control Plan that would have to be implemented during construction would facilitate the movement of construction

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

traffic and minimize potential traffic disruptions along Van Buren Boulevard and surrounding streets. Impacts to emergency access during construction activities would be short-term and less than significant.

The project would widen the eastbound right-turn lane on Van Buren Boulevard, as well as the southbound through lane on Lincoln Avenue. These would improve emergency access and evacuation in the area. The project also includes two driveways into the site and construction of internal drive aisles to provide access to parking areas and gas pumps. The driveway on Van Buren Boulevard would be 35 feet wide; the driveway on Lincoln Avenue would be 30 feet wide. The internal drive aisles would be 24 to 32 feet wide. The driveways and drive aisles have been designed in compliance with Title 18, Section 18.210.030 and the City's Fire Code (2016 California Fire Code) and would provide adequate emergency vehicle access, turning radii, corner visibility, gas pump and parking space access, lane width, and other roadway design requirements, subject to review and approval by the City's Fire Department and Department of Public Works. With compliance with City standards, the project would have a **less than significant impact** on emergency access directly, indirectly, or cumulatively.

18. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☐	☐	☒

18a. Response: ***(Source: General Plan 2025 Land Use and Urban Design Element Figure LU-5 – Historic Fabric; General Plan 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D – Cultural Resources Study for the City of Riverside; and Cultural Resource Literature Review prepared by Psomas in May 2018 [included in Appendix C])***

No Impact. The project site is not located in a City-designated Historical District and Neighborhood Conservation Area (per FPEIR Table 5.5-A - Historical Districts and Neighborhood Conservation Areas). The site is not part of the City's Historic Fabric (as shown in General Plan 2025 Land Use and Urban Design Element Figure LU-5 – Historic Fabric). The site is also not recognized or listed as a Historical Cultural Resource (in FPEIR Appendix D – Cultural Resources Study for the City of Riverside).

As discussed under Threshold 5a above, a cultural resources records search and literature review was completed at the EIC. No historic resources, including tribal cultural resources, are identified on the project site or in the vicinity that may be affected by the project. Therefore, no impacts on tribal historical resources would occur with implementation of the proposed project. Consultation with local Native American tribes did not result in the identification of any tribal historical resources that may be adversely affected by the project. As such, the project would have **no impact** directly, indirectly, or cumulatively.

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.	☐	☒	☐	☐

18b. Response: (Sources: Cultural Resource Literature Review prepared by Psomas in May 2018 [included in Appendix C])

Less than Significant With Mitigation Incorporated. The project area is located in the region known to have been occupied by the Cahuilla Indians. Cahuilla territory was bounded on the north by the San Bernardino Mountains; on the east by the Orocopia Mountains; on the west by the Santa Ana River, the San Jacinto Plain, and the eastern slope of the Palomar Mountains; and on the south by Borrego Springs and the Chocolate Mountains. The area was also within the territory occupied by the Luiseño, named by the Spanish after the Mission San Luis Rey de Francia in the present-day City of Oceanside, where some of their linguistic group frequented. The Luiseño cultural area incorporated southern Riverside County, northern San Diego County, and eastern Orange County; and the area was linguistically composed of a language of the Shoshonean language family. The site was previously used as agricultural land and an orchard, prior to its current use as a plant nursery. The site is highly disturbed; no known tribal cultural resources exist on the site.

A Sacred Lands File (SLF) search was requested from the Native American Heritage Commission (NAHC) on March 23, 2018. The NAHC indicated that no Native American traditional sites/places are within the project site or the half-mile buffer surrounding the site, but the NAHC provided a list of Native American contacts. Inquiry letters were subsequently sent to the 36 listed tribal groups and representatives. The following text documents the initial outreach and correspondence (Appendix C of this Initial Study) related to the results from the NAHC.

- On May 16, 2018, Ray Teran from the Viejas Band of Kumeyaay Indians responded by letter to the letter sent by Psomas on May 8, 2018. Mr. Teran reviewed the proposed project and has determined that the project has little cultural significance or ties to the Viejas Band of Kumeyaay Indians. However, Mr. Teran requested to be informed of any new developments or inadvertent discoveries of cultural resources, including human remains.
- On May 17, 2018, Bobby Ray Esparza from the Cahuilla Band of Indians responded by letter to the letter sent by Psomas on May 8, 2018. Mt. Esparza does not have any knowledge of any cultural resources and/or sites within or near the project site. Mr. Esparza requested to be notified of all updates and changes with the project.
- On May 17, 2018, Victoria Martin from the Augustine Band of Cahuilla Indians responded by letter to the letter sent by Psomas on May 8, 2019. Ms. Martin reviewed the proposed project and is unaware of specific cultural resources that may be affected by the project. Ms. Martin also recommended a qualified Native American monitor be contracted to monitor construction and requested to be notified of any discoveries of cultural resources.
- On May 30, 2018, Raymond Huaute from the Morongo Band of Mission Indians responded by letter to the letter sent by Psomas on May 8, 2018. Mr. Huaute commented that the project site is located with the tribe's ancestral territory and/or a traditional use area. Mr. Huaute also requested a copy of the EIC records search result, and a tribal monitor be present during any field studies.
- On June 7, 2018, Joseph Ontiveros from the Soboba Band of Luiseño Indians responded by letter and email to the letter sent by Psomas on May 8, 2018. Mr. Ontiveros reviewed the proposed project and determined the project site is located within the tribe's traditional use area. Mr. Ontiveros requested consultation with the project proponents, transfer of information to be Soboba Band of Luiseño Indians related to project updates, the Soboba Band of Luiseño Indians act as a consulting tribal entity for the project, a tribal monitor be present during cultural resource field studies and monitoring of ground disturbance, and proper procedures be taken, and requests of the tribe be honored.

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

On June 7, 2018, Destiny Colocho from the Rincon Band of Luiseño Indians responded by email to the letter sent by Psomas on May 8, 2018. Ms. Colocho reviewed the proposed project and determined the project site is within the territory of the Luiseño tribe; however, she mentioned the Rincon Band of Luiseño Indians has no knowledge of any cultural resources in the proposed project site. Ms. Colocho also mentioned no further consultation is required at this time.

AB 52 (Chapter 532, Statutes of 2014), which became effective on July 1, 2015, requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project, if they have requested such notice in writing. Once Native American tribes receive a project notification, they have 30 days to respond as to whether they wish to initiate consultation regarding the project, including subjects such as mitigation for any potential project impacts. If a tribe requests consultation and the lead agency and the tribe ultimately agree on mitigation to address any potentially significant impacts to tribal cultural resources, the mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. The City of Riverside transmitted AB 52 notification/consultation letters to the following tribes as part of the proposed development on the plant nursery site:

- Gabrieleno Band of Mission Indians – Kizh Nation
- Pechanga Cultural Resources Department
- Morongo Band of Mission Indians
- San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- Cahuilla Band of Mission Indians
- San Manuel Band of Mission Indians
- Agua Caliente Band of Cahuilla Indians

Three tribes responded:

- Soboba Band of Luiseño Indians – The City received correspondence on October 10, 2017, requesting to consult under AB 52.
- San Manuel Band of Mission Indians – The City received correspondence on September 25, 2017, in which San Manuel Band of Mission Indians did not request to consult under AB 52.
- Agua Caliente Band of Cahuilla Indians – The City received correspondence on September 27, 2017, in which Agua Caliente Band of Cahuilla Indians did not request to consult under AB 52.

The AB 52 consultation process was concluded with Soboba Band of Luiseño Indians on November 22, 2017, with the incorporation of MM CUL-3.

SB 18 (California Government Code, Section 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general plan or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the NAHC's SB 18 Tribal Consultation list within the geographical areas affected by the proposed general plan or specific plan amendment. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. The site was recently subject to a General Plan Amendment, and SB 18 consultation was initiated in September 2017. The City of Riverside sent project notification/consultation letters to 35 tribes on the SB 18 Tribal Consultation List and only the 29 Palms Band of Mission Indians responded, but did not requested consultation. Formal and confidential consultation between the City and tribal representatives has been completed.

The project would require implementation of MMs CUL-1, CUL-2, and CUL-3 listed in Section 5, Cultural Resources. These measures which require retention of a qualified Archaeologist and Paleontologist and a pre-grade conference/cultural sensitivity training to inform construction personnel of the potential for encountering unique cultural resources, requires the Archaeologist to evaluate unanticipated archaeological discoveries, have been developed to prevent any significant adverse

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
impacts on tribal cultural resources, With the implementation of MM CUL-1, MM CUL-2 and MM CUL-3 impacts on tribal cultural resources would be **less than significant after mitigation** directly, indirectly, and cumulatively.				
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction and relocation of which could cause significant environmental effects?	☐	☐	☒	☐

19a. Response: ***(Source: General Plan 2025 FPEIR Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure; Wastewater Integrated Master Plan; Tile: AM 14 Electric Map; RPU 2015 Urban Water Management Plan; and Sewer System Management Plan)***

Less Than Significant Impact. Impacts to water, wastewater treatment or storm water drainage, electric power, natural gas, telecommunication facilities, and cable television are discussed below.

Water

The Riverside Public Utilities (RPU) would provide water service to the proposed project, as identified in its April 19, 2019 Will Serve Letter (Riverside 2019). The City's water system consists of 55 groundwater wells, 15 reservoirs, and 6 treatment plants. The average water demand in the City is 63.6 million gallons per day. An existing 8-inch water line along Van Buren Boulevard connects to an 8-inch line in Lincoln Avenue. Water demand from the proposed project is estimated to use an average of 80 gallons per day (gpd) per restaurant customer and 21 gallons per day per retail customer (AWWARF 2000). Assuming the industry average of 200 to 300 restaurant customers and 250 gas station and retail customers per day, total water demand would be approximately 29,250 gpd or 0.09 acre-foot per day. There is available water supply to serve the project, as discussed under Threshold 19b below.

The plant nursery is currently served by a portable sewage tank and toilet that would be removed as part of the project. Wastewater generation by the project is estimated at 80 percent of water use or 23,400 gpd. The proposed buildings would be connected to the existing 8-inch sewer line in Van Buren Boulevard. Water service to the project will include connections to the existing water line in Van Buren Boulevard, and these connections would not result in any major change to the City's water system. Also, the impacts of construction of the water line connections have been accounted for in the analyses of the project's environmental impacts in this Initial Study. Impacts would be **less than significant** directly, indirectly, or cumulatively.

Wastewater Treatment/Storm Drainage

The sewer line in Van Buren Boulevard conveys wastewater to the RWQCP, which is located at 5950 Acorn Street and has a 40-million-gallon-per-day (mgd) capacity. The RWQCP treated approximately 33 mgd in 2008 and 28 mgd in 2017, indicating a slowdown in population growth and a reduction in wastewater generation through water conservation. Thus, there is existing available capacity at the RWQCP to treat the estimated 23,400 gpd of wastewater from the project, which would represent less than 0.1 percent of both the existing plant capacity and total wastewater volume. Further, the RWQCP is projected to treat 47.3 to 52.2 mgd by 2025 and is currently being upgraded to treat 46 mgd. The Wastewater Integrated Master Plan also proposes the expansion of the plant to 52.2 mgd to meet future demand, based on a maximum growth rate of 1.5 percent annually, along with other system upgrades to provide adequate sewer services. With implementation of system improvements outlined in the Wastewater Integrated Master Plan, sewer treatment capacity would be available to serve the proposed project in the future.

The potential impacts associated with connections to the sewer line in Van Buren Boulevard have been addressed in this Initial Study and are primarily related to the temporary disruption of travel lanes along Van Buren Boulevard (refer to Thresholds 17a and 17d, in Section 17, Transportation). Further, the Developer would pay applicable sewer service charges

to help fund the operating costs and needed sewer system improvements and would comply with sewer discharge regulations in Title 14 of the RMC, consistent with General Plan Policy PF-3.2.

Under existing conditions, the majority of storm water percolates into the ground and runoff flows northwesterly to the storm drain line in Van Buren Boulevard, near Rudicill Street. The on-site storm drain system has been designed to accommodate the 10-year and 100-year storm flows. As discussed under Threshold 10a in Section 10, Hydrology and Water Quality, the proposed storm drain system would convey storm water into two hydrodynamic separators that would reduce pollutants in the storm water and be connected to underground infiltration chambers to allow for ground infiltration of treated storm water. The change in runoff volume and rate and the change in off-site drainage patterns would not be large enough to exceed the capacity of the downstream storm drain lines and drainage channels.

As discussed under Threshold 10a in Section 10, Hydrology and Water Quality, the Preliminary WQMP proposes that storm water pollutants from the project be treated through site design, source control, and treatment control BMPs. As proposed in the Preliminary WQMP and shown on Exhibit 13 in Section 10, the project would include two storm water treatment chambers (or hydrodynamic separators) and two underground infiltration chambers (linear chambers with a pervious bottom consisting of an angular stone foundation base on a geotextile layer) that would capture storm water on the site through grate inlets and allow for pollutant removal and ground infiltration. The hydrodynamic separators would remove coarse sediment, debris, and free-floating oil in the storm water runoff. The underground infiltration chambers would allow treated storm water to infiltrate into the soils. The proposed changes resulting from the project site would not require the construction of a new storm water drainage facility or the expansion of existing facilities that could result in significant impacts.

The storm water runoff from the project site would not exceed the capacity of the existing storm drain system, and no infrastructure improvements would be required beyond the installation of on-site storm drain facilities. The construction of the on-site water quality BMPs and storm drain lines within the project site has the potential for temporary construction-related impacts. Since utility installations are within the construction impact limits identified for the proposed project, the potential impacts associated with the construction of storm drain lines have been addressed in the respective sections of this IS/MND. Impacts would be **less than significant** directly, indirectly, or cumulatively.

Electricity

The RPU provides electrical power services to the site, and existing power lines are located along Van Buren Boulevard and Lincoln Avenue. The project's projected electricity usage is shown in Table 7, Energy Use During Operations. The project would result in an increase in electricity usage compared to the existing land uses; however, electrical service to the project site would be provided in accordance with RPU's policies and extension rules on file with the California Public Utilities Commission. A significant impact related to the need for new systems or supplies or substantial alterations related to electricity is not anticipated to occur. Additionally, the project applicant will coordinate with SCE to ensure avoidance of any notable service disruptions during the extension of, relocation of, upgrade of, or connection to services. Impacts are considered **less than significant** directly, indirectly, or cumulatively.

Natural Gas

Southern California Gas Company would provide wastewater service to the proposed project, as identified in its May 6, 2019 Will Serve Letter (SCG 2019). SCG has a 2-inch gas line in Van Buren Boulevard and a 3-inch gas line in Lincoln Avenue which service the project site. The project's projected natural gas usage is shown in Table 7, Energy Use During Operations. The project would result in an increased demand for natural gas usage compared to the existing land uses. However, the service would be provided in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission. Therefore, a significant impact related to the need for new systems or supplies or substantial alterations related to natural gas would not occur. Additionally, the property applicant will coordinate with SCG to ensure avoidance of any notable service disruptions during the extension of, relocation of, upgrade of, or connection to services. Impacts are considered **less than significant** directly, indirectly, or cumulatively.

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

Telecommunications

Spectrum currently provides telecommunications service to the City of Riverside, including the project Site. The service would be provided in accordance with Spectrum's policies and extension rules on file with the California Public Utilities Commission. Therefore, a significant impact related to the need for new systems or supplies or substantial alterations related to telecommunications would not occur. Additionally, the project applicant will coordinate with Spectrum to ensure avoidance of any notable service disruptions during the extension of, relocation of, upgrade of, or connection to services. Impacts are considered **less than significant** directly, indirectly, or cumulatively.

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

19b. Response: ***(Source: General Plan 2025 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, and Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025 and RPU UWMP)***

Less Than Significant Impact. The RPU 2015 Urban Water Management Plan (UWMP) discusses the existing and projected water demand and available water supplies to meet demand in its service area, under a normal year, single dry year, and multiple dry years. The City's water supply includes groundwater resources, recycled water, and imported water sources (i.e., rivers, streams, ponds, and springs). In 2015, the City used 74,926 acre-feet of groundwater and 200 acre-feet of recycled water to meet demand. The City anticipates future growth and development in its service area to increase demand to 124,703 acre-feet by 2040. Future supplies would include increased amounts of recycled water and imported water, with water conservation programs anticipated to decrease per capita demands. Total water demand from the project is estimated at 29,250 gpd or 0.09 acre-foot per day, which would be a minor amount of existing and future water demand in the City.

The 2015 UWMP states that the City's water supplies are adequate to meet future demand under a normal, single dry and multiple dry years. The projected increase in demand was based on SCAG's 2012 RTP/SCS growth projections, which have since been revised/decreased in the 2016 RTP/SCS to account for the effects of the economic recession. Thus, the UWMP overestimates future water demand in the City, and water supply would be available to serve the project. Since the UWMP must be updated every five years to include the most recent population trends, it would account for revisions in SCAG's RTP/SCS growth projections through the years, including decreases in regional growth that are reflected in the 2016 RTP/SCS. Also, the City consults with the Riverside Public Utilities (RPU) regarding development projects considered a "water-demand project" based on criteria outlined in CEQA Guidelines Section 15155, City or County Consultation with Water Agencies, to ensure that sufficient water supplies are available. The size of the proposed project does not require preparation of a water supply assessment. Consistent with General Plan Policies PF-1.1 and PF-1.3, RPU provided comments during the Development Review process that have been subsequently addressed through site plan revisions to facilitate water service to the proposed project.

Although the water supply would be sufficient to serve the project, if water demand within the RPU service boundaries were to exceed supply, Western Municipal Water District (WMWD) can sell water to RPU. As shown on Table 5.16-I of the GP 2025 FPEIR, WMWD would have 123,784 acre-feet annually to sell to other agencies like RPU. Therefore, water supply may be available for development beyond that anticipated under the General Plan, including the proposed project. The project would also implement water conservation measures, as called out in the CalGreen Code and City's water conservation program, consistent with General Plan Policies AQ-8.42 and PS-1.5. Specifically, the proposed project would also implement various water conservation measures, as required by the CalGreen Code (as adopted into Chapter 16.07 of the RMC) and Chapters 14.20, 14.22, and 19.570 of the RMC related to water service connections, water-efficient landscaping and irrigation, and the City's water conservation program.

The proposed project would generate a demand for water but would have a **less than significant impact** on water supplies either directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒

19c. Response: ***(Source: General Plan 2025 FPEIR Figure 5.16-5 - Sewer Service Areas and Figure 5.16-6 - Sewer Infrastructure and Wastewater Integrated Master Plan)***

No Impact. The project site is located within the sewer service area of the City where existing sewer infrastructure lines are present. The proposed project would not exceed wastewater treatment requirements of the Santa Ana RWQCB, as discussed under Threshold 19a above. Also, the RWQCP has available capacity to treat the current wastewater volume in the City and the projected wastewater volume from the proposed project, as discussed under Threshold 19b above. The Wastewater Integrated Master Plan proposes the expansion of the City's wastewater treatment plant to 52.2 mgd to meet future demand (estimated at an annual growth rate of 1.5 percent), along with other system upgrades to provide adequate sewer services in the City. Therefore, **no impact** related to wastewater treatment directly, indirectly, or cumulatively would occur with the project.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

19d. Response: ***(Source: General Plan 2025 Public Facilities and Infrastructure Element; General Plan 2025 FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area; and CalRecycle Facility/Site Summary Details)***

Less Than Significant Impact. The City's Public Works Department collects solid wastes from single-family residential units, while multi-family and commercial developments have the option to contract with any of the authorized waste haulers in the City: Athens, Burrtec, and CR&R. Waste collection services for the project would be provided by one of these authorized waste haulers. Should Athens or Burrtec serve the project, they would bring collected solid wastes to the Robert Nelson Transfer Station (Athens 2017; Burrtec 2017a). This transfer station, located at 1830 Agua Mansa Road in Riverside, is owned by Riverside County and operated by Burrtec. It is permitted to accept 4,000 tons of wastes per day (CalRecycle 2018a). It currently processes approximately 1,800 tons of solid waste per day (Burrtec 2017b).

From the transfer station, solid waste is brought to the Badlands Sanitary Landfill in Moreno Valley, which is permitted to accept 4,800 tons per day and has a remaining capacity of 15.7 million cubic yards as of January 2015. This landfill is expected to close in January 2022 (CalRecycle 2018b). Waste may also be brought to the El Sobrante Landfill in Corona or the Lamb Canyon Landfill in Beaumont. The El Sobrante Landfill is permitted to accept 16,054 tons per day and has a remaining capacity of 145.5 million cubic yards as of April 2009. It is expected to close in January 2045 (CalRecycle 2018c). The Lamb Canyon Landfill is permitted to accept 5,500 tons per day and has a remaining capacity of 19.2 million cubic yards as of January 2015. It is expected to close in April 2029 (CalRecycle 2018d).

If CR&R serves the project, collected solid wastes would be brought to the Perris Transfer Station and Material Recycling Facility (MRF) located at 1706 Goetz Road in the City of Perris (CR&R 2017). This MRF is permitted to accept up to 3,287 tons of solid waste per (CalRecycle 2018e). From this MRF, waste is disposed at the Badlands Sanitary Landfill, El Sobrante Landfill, or Lamb Canyon Landfill.

As required by the CalGreen Code, the contractor would implement a Construction Waste Management Plan that would recycle and/or salvage at least 65 percent of the estimated volume or weight of all non-hazardous construction and demolition wastes, consistent with General Plan Objective PF-5 and Policies AQ-5.1, AQ-8.18, and PF-5.2. Landfill capacity demand during construction would be limited and temporary, and this impact is considered less than significant.

During operation, the proposed project would generate approximately 524 pounds of solid wastes per day, based on the City's 2016 per capita disposal rate of 15.4 pounds per employee per day (CalRecycle 2018f). This would be considered a limited amount of solid wastes when compared to the waste generation of all other existing developments in the City (estimated at

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

415,150 tons in 2016) (CalRecycle 2018h); the capacities of the transfer stations and landfills used by the City and authorized haulers; and the wastesheds of the Badlands Sanitary Landfill, Lamb Canyon Landfill, and the El Sobrante Landfill. The project would also implement waste reduction and recycling programs to reduce its demand for landfill space, as required under the CalGreen Code, AB 341 and City regulations. Specifically, separate trash and recycling bins and enclosures would be provided on site in accordance with the requirements of the Planning Division and Public Works Department, Solid Waste Division, and Chapter 19.554 of the RMC.

The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure and would comply with all applicable solid waste reduction goals, policies and regulations, nor would it impair the attainment of solid waste reduction goals. Therefore, less than significant impacts pertaining to generation of solid waste in excess of State or local standards or in excess of the capacity of local infrastructure would occur directly, indirectly, or cumulatively with the project.

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

19e. Response: ***(Source: CalRecycle Jurisdiction Diversion/Disposal Rate; AB 341; and California Green Building Standards Code)***

No Impact. The California Integrated Waste Management Act under the Public Resource Code required that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The diversion goal was been increased to 75 percent by 2020 by SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 (SB 1016) was established to make the process of goal measurement (as established by AB 939) simpler, more timely, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdiction's performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. The City's targets are set at 8.6 pounds per resident per day and 19.5 pounds per employee per day. The City is currently achieving a 60-percent diversion rate, above State AB 939 requirements. In 2016, the City implemented 39 programs to reduce solid waste generation and achieve the increased solid waste diversion required. These programs involve composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, special waste materials, and transformation activities (CalRecycle 2018g). The City had an average disposal rate of 6.9 pounds per resident per day and 15.4 pounds per employee per day in 2016, which is below the established disposal rate targets of 8.6 pounds per resident per day and 19.5 pounds per employee per day (CalRecycle 2018f).

The CalGreen Code requires all new developments to divert 65 percent of non-hazardous C&D debris for all projects. Chapters 6.04 and 6.05 of the RMC require the collection and recycling of solid wastes in the City and provide regulations for solid waste collection, handling, recycling, and disposal. AB 341 also requires that multi-family developments with more than five units and commercial and industrial uses to implement on-site recycling programs. The proposed project would comply with the CalGreen Code requirements for C&D diversion and with AB 341 mandates for on-site recycling programs by providing recycling bins at two on-site trash storage areas and contracting for recycling bin collection by the selected waste hauler. In addition, the project would participate in the City's recycling programs and comply with hazardous waste disposal regulations, as discussed above under Threshold 9b in Section 9, Hazards and Hazardous Materials. As such, the project would not conflict with any federal, State, or local regulations related to solid waste. Therefore, **no impact** related to compliance with solid waste management and reduction statutes would occur directly, indirectly, or cumulatively with the project.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

20a. Response: ***(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas and CalFire Very High Fire Hazard Severity Zones in LRA, General Plan 2025 Figure PS 8.1 - Evacuation Routes; General Plan 2025 FPEIR Chapter 5.7 – Hazards and Hazardous Materials; City of Riverside Emergency Operations Plan (EOP); City of Riverside-Annex Local Hazard Mitigation Plan (LHMP); Fire Department Strategic Plan; and Standard Drawings for Construction*****)**

No Impact. The proposed project is not within a designated Very High Fire Hazard Severity Zones (VHFHSZ), as defined by the California Department of Forestry and Fire Prevention (CalFire). As stated in Threshold 9f in Section 9, Hazards and Hazardous Materials, emergency evacuation in the City would be conducted under the supervision of the City's Police Department, Fire Department, and/or the California Office of Emergency Services in accordance with the City's Emergency Operations Plan (EOP), Local Hazard Mitigation Plan (LHMP), and Fire Department Strategic Plan, which address the City's planned responses to emergencies and hazards. Van Buren Boulevard is a designated evacuation route in the City, as shown in Figure PS-8.1 in the Public Safety Element of the General Plan. Widening of Van Buren Boulevard as part of the project would improve emergency evacuation along this road. During construction, any street closures would be of short duration so as not to interfere or impede with any emergency response or evacuation in the surrounding areas, and at least one lane of travel would be maintained in each direction at all times. Temporary and partial street closures would comply with the Standard Specifications for Public Works Construction (Greenbook) (as amended and adopted by the City), which contains standards for maintenance of access; traffic control; and notification of emergency personnel. Additionally, because Thresholds 20a through 20d apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", **no impact** related to wildland fires would occur either directly, indirectly, or cumulatively.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

20b. Response: ***(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas and CalFire Very High Fire Hazard Severity Zones in LRA)***

No Impact. As indicated in Threshold 9g in Section 9, Hazards and Hazardous Materials, the project site is located in an urbanized area, and there are no large undeveloped areas and steep slopes on or near the site that may exacerbate the risk of wildfire and thus expose future residents to fire hazards and pollutants from fire. The project site and the surrounding areas are not in designated Fire Hazard Areas, as shown in Figure PS-7 of the General Plan 2025 or in a VHFHSZ, as identified by CalFire. Rather, the site is within a Non-VHFHSZ area. The nearest VHFHSZ is located approximately 1.3 miles southeast of the site, near Mockingbird Canyon. Since the proposed project would not be exposed to nor would it create wildfire hazards (as consistent with Riverside General Plan Objective PS-6), **no impact** related to wildland fires would occur either directly, indirectly, or cumulatively.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

20c. Response: ***(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas and CalFire Very High Fire Hazard Severity Zones in LRA; Riverside Municipal Code; City's Fire Code; and Traffic Impact Analysis prepared by Ganddini Inc. in April 2019 [included in Appendix J])***

No Impact. As previously discussed, the proposed project is not within a designated VHFHSZ, as defined by CalFire. As indicated in Section 3.0, Project Description, the site is located in a highly urbanized area that is already served by existing infrastructure such as roads and utilities. Any new utility infrastructure at the site will be constructed in accordance with all applicable regulatory standards and would not exacerbate fire risk or that may result in temporary or ongoing impacts to the

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
environment. Additionally, because Thresholds 20a through 20d apply only to those projects that are "located in or near state responsibility areas or lands classified as very high fire hazard severity zones", **no impacts** related to these thresholds would occur, and no mitigation is required.				
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

20d. Response: ***(Source: Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas and CalFire Very High Fire Hazard Severity Zones in LRA; Site Visit)***

No Impact. As previously described, the proposed project is not within a designated VHFHSZ, as defined by CalFire. The project is located in a highly urbanized area, and the site topography is generally flat and away from downslope or landslide areas. Proposed drainage changes are described in Section 10, Hydrology and Water Quality. Specifically, implementation of the project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. **No impacts** would occur, and no mitigation is required.

21. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

21a. Response: ***(Source: General Plan 2025 Figure OS-6 – Stephens' Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, and 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; Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, and Appendix D – Cultural Resources Study; Western Riverside County MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools; RMC Title 20 – Cultural Resources; and Cultural Resource Literature Review prepared by Psomas in May 2018 [included in Appendix C])***

Less Than Significant Impact with Mitigation Incorporated. Potential impacts related to habitat of fish or wildlife species were discussed under Thresholds 4a to 4f in Section 4, Biological Resources, of this Initial Study. Impacts were determined to be less than significant with payment of the Western Riverside County MSHCP development mitigation fee and implementation of MM BIO-1, which requires a pre-construction survey for nesting birds on the site and in the construction area and describes the methods for managing any active nest sites, if encountered. Implementation of MM BIO-1 would reduce potential impacts related to nesting birds to a less than significant level. The proposed project would not have the potential to substantially degrade the quality of the environment; would not substantially reduce the habitat of a fish or wildlife species; would not cause a fish or wildlife population to drop below self-sustaining levels; would not threaten to eliminate a plant or animal community; and would not substantially reduce the number or restrict the range of a Rare or Endangered plant or animal.

Additionally, potential impacts to cultural, archaeological, and paleontological resources related to major periods of California and the City of Riverside's history or prehistory were discussed under Thresholds 5a to 5d in Section 5, Cultural Resources, Threshold 7f in Section 7, Geology and Soils, and Thresholds 18a and 18b in Section 18, Tribal Cultural Resources of this Initial Study. No impact on historical resources would occur, and impacts would be less than significant

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
with compliance with existing regulations in the event of the discovery of human remains. Impacts on archaeological resources, tribal cultural resources, and paleontological resources would be minimized and/or avoided through the implementation of MMs CUL-1, CUL-2, CUL-3, and GEO-1, which require retention of an archaeologist and paleontologist, a pre-grade conference/cultural sensitivity training with the construction crew, and evaluation of any archaeological artifact, Native American cultural resource, or fossil specimen discovered during construction activities by a qualified archaeologist or paleontologist to determine whether the resource is significant and to develop and implement a mitigation plan that includes a data recovery plan for the salvage, recovery, testing, reporting, and curation of archaeological materials at an appropriate facility. Implementation of the mitigation measures for biological resources and cultural resources and compliance with existing regulations would result in **less than significant impacts after mitigation.**				
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐

21b. Response: ***(Source: Traffic Impact Analysis prepared by Ganddini, Inc. in April 2019 [included in Appendix J] and Noise and Vibration Analysis prepared by Psomas in May 2018 [included in Appendix I])***

Less Than Significant Impact. Aside from the project, a number of other private development projects are proposed or planned in the surrounding area (see Traffic Impact Analysis in Appendix J of this Initial Study). Those nearest the site include a proposed 180-unit multi-family residential development on the remaining parcel of the plant nursery (immediately adjacent to the site) and light industrial development north of the intersection of Van Buren Boulevard and Rudicill Street. If construction of these cumulative projects occurs at the same time as the project, increased pollutant emissions, noise, and traffic from construction activities and truck trips may occur. However, there would be no overlap in grading activities, which is the major source of construction noise, since the tentative construction start for the adjacent residential development is approximately 6 to 8 months ahead of the proposed project. Also, as discussed under Threshold 3c, the project's construction emissions would be less than SCAQMD thresholds and thus, would not be cumulatively significant.

The environmental impacts of these cumulative projects would also add to the long-term operational impacts of the project on a cumulative basis. However, the impacts of the proposed commercial project have been considered in the Traffic Impact Analysis for the project, and in the Air Quality and Noise and Vibration Analysis. Also, project impacts would be avoided and/or reduced to less than significant levels by the implementation of mitigation measures, as discussed under the environmental analysis under each topical issue above. Since project impacts would be less than significant after mitigation, impacts associated with the project would not result in cumulatively considerable impacts when added to the impacts of other projects planned or proposed in the vicinity of the site. Cumulative impacts would be **less than significant**.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

21c. Response: ***(Sources: General Plan 2025 FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program and Air Quality Analysis, Greenhouse Gas Analysis, and Noise and Vibration Analysis prepared by Psomas in May 2018 [included in Appendix H]; and Traffic Impact Analysis prepared by Ganddini, Inc, in April 2019 [included in Appendix J])***

Less Than Significant Impact with Mitigation Incorporated. Effects on human beings were evaluated in the above environmental topic sections of this Initial Study.

Potential impacts related to Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, and Noise would be less than significant with compliance with existing regulations. Potential impacts related to Transportation would be avoided or reduced to less than significant levels with implementation of MM TRA-1 and MM TRA-2. Therefore, the proposed project, with mitigation, would not cause substantial adverse effects, directly or indirectly, to human beings. Potential direct and indirect impacts on human beings that result from the proposed project would be **less than significant after mitigation**.

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).

TABLE 24
MITIGATION MONITORING AND REPORTING PROGRAM

Issue	Mitigation Measures		Implementation Timing	Responsible for Monitoring	Monitoring/ Reporting Method
Biological Resources	**MM BIO-1**	To avoid impacts on nesting birds, street trees shall be removed between September 1 and February 15 of the following year. If street tree removal will occur inside the peak nesting season (between February 16 and August 31), a pre-construction survey shall be conducted by a qualified Biologist to identify if there are any active nesting locations on the site and the construction areas. If the Biologist does not find any active nests within this area, then vegetation clearing and construction work will be allowed. If the Biologist finds an active nest within the area and determines that the nest may be impacted by demolition/construction activities, the Biologist will delineate an appropriate buffer zone around the nest depending on the species and the type of construction activity. Demolition/construction activities would be prohibited in the buffer zone until a qualified Biologist determines that the nest has been abandoned.	Prior to vegetation removal or the start of demolition activities, between September 1 and February 15 of the following year	Community & Economic Development Department, Planning Division	Preconstruction Survey Report submitted to the City
Cultural Resources/ Tribal Cultural Resources	**MM CUL-1**	**On Call Project Archeologist:** Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a Secretary of Interior Standards County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Archaeologist and Paleontologist shall be on call during all grading and other significant ground-disturbing activities in native sediments.	Prior to issuance of a grading permit	Community & Economic Development Department, Planning Division Registered Professional Archaeologist and Paleontologist	Compliance with Project Conditions of Approval Letter to City Planning Division from Archeologist and Paleontologist
	MM CUL-2	**Cultural Sensitivity Training:** The Secretary of Interior Standards County certified Archaeologist and Native American Tribes consulting on the project shall attend the pre-grading meeting with the Developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign in sheet for	Prior to ground disturbance	Community & Economic Development Department, Planning, Building and Safety Divisions and Public Works Department.	Submission of a Sign-In Sheet to the City

TABLE 24
MITIGATION MONITORING AND REPORTING PROGRAM

Issue	Mitigation Measures	Implementation Timing	Responsible for Monitoring	Monitoring/ Reporting Method
	attendees of this training shall be included and submitted to the Archeologist.			
	MM CUL-3 **Treatment and Disposition of Cultural Resources:** In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project. The following procedures will be carried out for treatment and disposition of the discoveries: 1. ***Temporary Curation and Storage***: During the course of construction, all discovered resources shall be temporarily curated in a secure location on-site or at the offices of the project Archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite 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	During ground disturbance	Community & Economic Development Department, Planning Division Project Applicant Landowner Grading contractor Registered Professional Archaeologist	If resources are found and curated, a copy of the curation agreement shall be provided to the City. Submission of a Phase IV Monitoring Report.

TABLE 24
MITIGATION MONITORING AND REPORTING PROGRAM

Issue	Mitigation Measures	Implementation Timing	Responsible for Monitoring	Monitoring/ Reporting Method
	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. If more than one Native American tribe or band is involved with the project and cannot come to agreement consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the Archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center and interested tribes.			

TABLE 24
MITIGATION MONITORING AND REPORTING PROGRAM

Issue	Mitigation Measures	Implementation Timing	Responsible for Monitoring	Monitoring/ Reporting Method
Geology and Soils	**MM GEO-1** In the event that any paleontological resources (e.g., plant or animal fossils) are encountered before or during grading, the Property Owner/Developer shall retain a qualified Paleontologist to evaluate unanticipated discoveries and to take appropriate measures to protect or preserve them for study. The Paleontologist shall submit a report of findings that will also provide specific recommendations regarding further mitigation measures (i.e., paleontological monitoring) that may be appropriate. Where mitigation monitoring is appropriate, the program must include, but not be limited to, the following measures: • Assign a Paleontological Monitor, trained and equipped to allow the rapid removal of fossils with minimal construction delay, to the site full time during earth-disturbing activities. • Divert earth-disturbing activities away from the immediate area of the discovery until the Paleontological Monitor has completed salvage. If construction personnel make the discovery, the Grading Contractor shall immediately divert construction and notify the Paleontological Monitor of the find. • Prepare, identify, and curate all recovered fossils for documentation in the summary report and transfer to an appropriate depository (e.g., Natural History Museum of Los Angeles County). Prepare and submit a technical report describing the identification, salvage, evaluation, and treatment of all fossils discovered during grading to the City of Riverside. Transfer collected specimens with a copy of the report to the depository.	During ground disturbance.	Grading contractor Registered Professional Paleontologist	Compliance with Project Conditions of Approval Final report to City Planning Division from Paleontologist; if resources are found.

TABLE 24
MITIGATION MONITORING AND REPORTING PROGRAM

Issue	Mitigation Measures		Implementation Timing	Responsible for Monitoring	Monitoring/ Reporting Method
	MM TRA-1	Prior to issuance of Certificate of Occupancy, the Project Applicant shall provide 14.2% fair share contribution toward improvements at the Van Buren Boulevard at Rudicill Street intersection that is satisfactory to the City Traffic Engineer. The improvements will include restriping the eastbound approach to consist of one left turn lane and one shared through/right turn lane.	Prior to issuance of Certificate of Occupancy	City Traffic Engineer, Public Works Department	Compliance with Project Conditions of Approval
	MM TRA-2	Prior to issuance of Certificate of Occupancy, the Project Applicant shall provide 5.7% fair share contribution s toward improvements at the Van Buren Boulevard at SR-91 Westbound Ramps intersection that is satisfactory to the City Traffic Engineer. The improvements will include installing southbound right turn overlap traffic signal phasing.	Prior to issuance of Certificate of Occupancy	City Traffic Engineer Public Works Department	Compliance with Project Conditions of Approval

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Appendix A

Air Quality Analysis

Appendix B

Burrowing Owl Habitat Assessment

Appendix C

Cultural Resource Literature Review

Appendix D

Energy Calculations

Appendix E

Preliminary Soil Investigation

Appendix F

Greenhouse Gas Emissions Analysis

Appendix G

Phase I and Phase II Environmental Site Assessment

Appendix H

Preliminary Water Quality Management Plan

Appendix I

Noise and Vibration Analysis

Appendix J

Traffic Impact Analysis