



City of Arts & Innovation

# COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

## Draft Mitigated Negative Declaration

WARD: 2

1. **Case Number:** P18-0028 (Zoning Code Map Amendment), P18-0034 (Tentative Parcel Map), P18-0031 (Conditional Use Permit), P18-0032 (Conditional Use Permit), and P18-0033 (Design Review)
2. **Project Title:** Sycamore Canyon Commercial Project
3. **Public Hearing Date:** April 18, 2019
4. **Lead Agency:** City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522
5. **Contact Person:** Matthew Taylor, Associate Planner  
**Phone Number:** (951) 826-5944
6. **Project Location:** The 2.19-acre project site is located between the southbound I-215 off-ramp and Sycamore Canyon Boulevard, north of Central Avenue and adjacent to the City boundary (APN# 256-050-007-01)
7. **Project Applicant/Project Sponsor's Name and Address:** Dan Goalwin  
Barghausen Consulting Engineers  
3883 Ruffin Rd, Suite B  
San Diego CA 92123
8. **General Plan Designation:** Commercial
9. **Zoning:** Proposed Zoning: CG – Commercial General Zone
10. **Description of Project:**

The proposed project by Mr. Allen Sipe, on behalf of Eugene Marini of KA Enterprises, is to obtain entitlements for construction of a commercial development including a fueling station with 12 gasoline pumps, a car wash, a 3,200 square-foot (sf) convenience store, and a 3,800-sf fast food restaurant with drive-thru and associated parking.

The property is an approximately 2.19-acre site adjacent to Sycamore Canyon Boulevard and the Interstate-215 (I-215) southbound off-ramps in the City of Riverside. The project site is comprised of

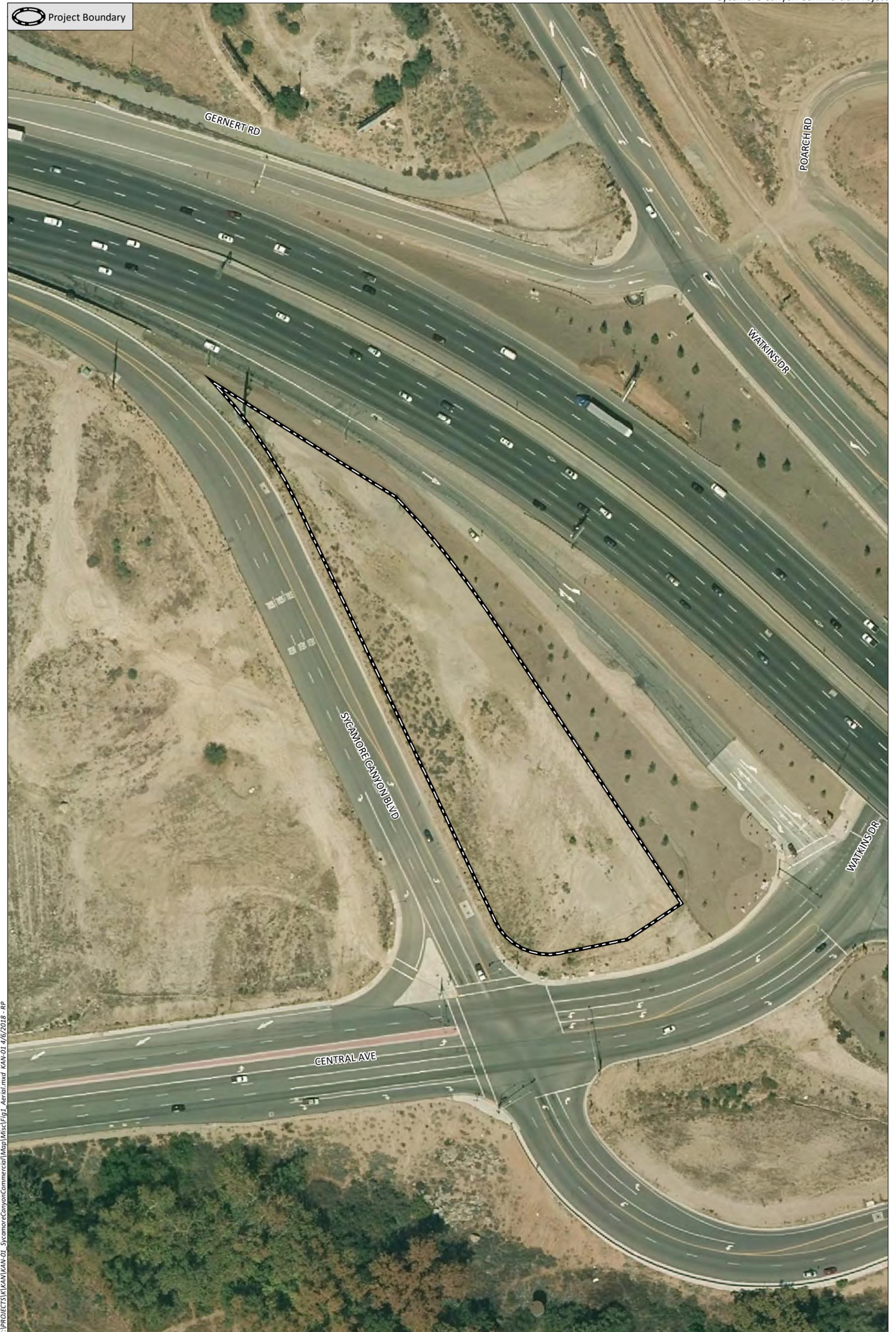
three parcels totaling 84,386 square feet (2.19 acres). The site is approximately 790 feet long, 170 feet wide, tapered to a wedge to the north, and a 210-foot base to the south at the corner of Central Avenue and Sycamore Canyon Boulevard. The project site is vacant and consists of bare dirt and sparse vegetation. The site is bordered to the west by Sycamore Canyon Boulevard, to the east by the Central Avenue off-ramp of I-215/SR-60, and to the south by Central Avenue. Residential development is located approximately 640 feet south and 2,200 feet west of the project site, and hillsides with low density single-family residential development are located to the east of I-215/SR-60.

The project entails the construction of a 3,200 square-foot convenience store, one fast food restaurant with a drive-thru (3,800 square feet), a carwash (1,518 square feet), a gas station with six two-sided gas pumps (for a total of 12 fueling positions), and 52 vehicle surface parking spaces for all proposed commercial uses. The carwash component dryer would be designed to not generate a noise level of greater than 84 A-weighted decibels (dBA) at a distance of 10 feet from the exit of the tunnel and includes two additional self-vacuum parking spaces. The project would also include the installation of a Healy clean air separator to hold excess gasoline vapors from the storage tanks. Product throughput for the proposed gas station is estimated at 2.4 million gallons per year (2,150,000 gallons of gasoline, and 250,000 gallons of diesel).

Project features include low-flow plumbing and energy efficient fixtures for all proposed structures and the installation of white roofing to reduce heat absorption. The project also includes the installation of five bioretention ponds along the perimeter of the project site. Primary vehicular access to the project site would be provided by two driveways located along Sycamore Canyon Boulevard. Construction would take approximately seven months.

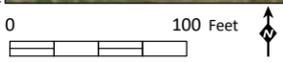
The project will require approval of a Zoning Code Map Amendment to apply the CG – Commercial General Zone to the project site, which was not previously zoned; a Tentative Parcel Map to subdivide the subject 2.19 acres into two lots ranging in size from 1.04 to 1.15 acres; a Conditional Use Permit to permit a vehicle fuel station with the concurrent off-sale of beer and wine and a drive-thru automated vehicle wash facility; a Conditional Use Permit for a drive-thru restaurant; and Design Review of project plans including the plot plan, building elevations, conceptual grading and landscape plans. These entitlements will be considered and acted upon by the City Planning Commission and the City Council. Separately, the project requires a determination by the Riverside County Airport Land Use Commission (ALUC) that the proposed Zoning is consistent with Zone E the March Air Reserve Base/March Inland Port Land Use Compatibility Plan; ALUC issued a Director’s Determination of Consistency for the proposed project on July 26, 2018 (File No. ZAP1304MA18).

Project Boundary



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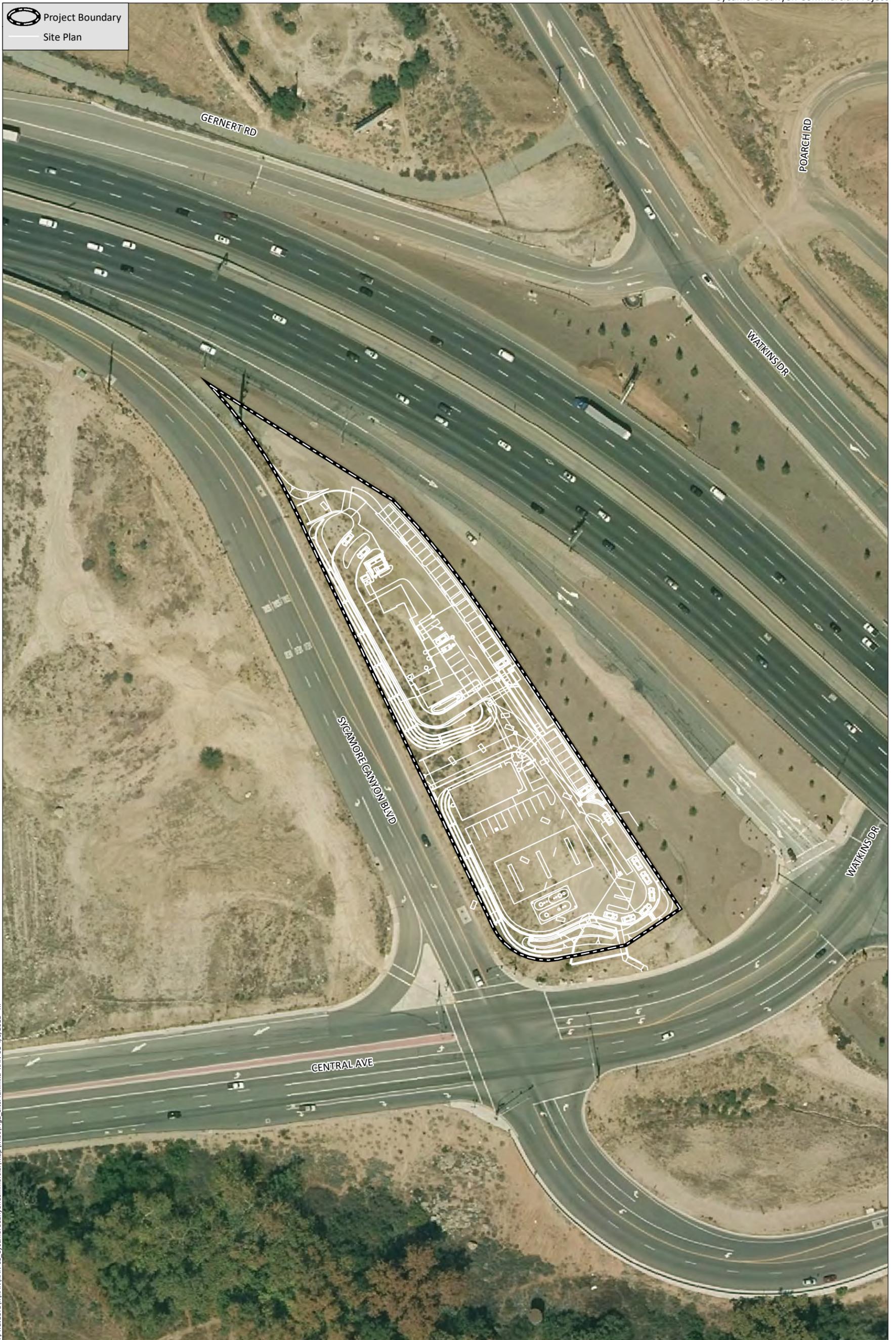
Source: Aerial (Eagle, 2014)



# Project Location

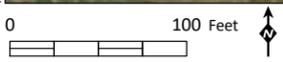
Figure 1

 Project Boundary  
 Site Plan



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Source: Aerial (Eagle, 2014)



Site Plan  
Figure 2

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

	<b>Existing Land Use</b>	<b>General Plan Designation</b>	<b>Zoning Designation</b>
<b>Project Site</b>	Vacant	C – Commercial	N/A
<b>North</b>	I-215 & vacant	HR – Hillside Residential	RC – Residential Conservation; C-1/C-P – General Commercial (County of Riverside)
<b>South</b>	Open Space	P – Public Park	C-P-S – Scenic Highway Commercial (County of Riverside)
<b>East</b>	I-215 & vacant	HR – Hillside Residential	A-1-1 – Light Agriculture (County of Riverside); SP – Specific Plan (Gateway Center) (County of Riverside)
<b>West</b>	Vacant	C – Commercial	CG – Commercial General

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

- a. South Coast Air Quality Management District (SCAQMD) – Dust Control Plan
- b. Regional Water Quality Control Board (RWQCB), Santa Ana Region – National Pollutant Discharge Elimination System (NPDES) Construction General Permit
- c. RWQCB, Santa Ana Region – 401 Water Quality Certification – Waste Discharge Requirement (WDR)
- d. Santa Ana Regional Water Quality Control Board – Water Quality Management Plan (WQMP); and
- e. Santa Ana Regional Water Quality Control Board – Storm Water Pollution Prevention Plan (SWPPP).
- f. Riverside County Airport Land Use Commission (ALUC) – Major Land Use Action Review

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

- a. General Plan 2025
- b. GP 2025 Final Programmatic Environmental Impact Report (FPEIR)

**14. List of Appendices**

- a. Appendix A: Project Plans
- b. Appendix B: Air Quality and Greenhouse Gas Study, Rincon Consultants, Inc. (September 2018)
- c. Appendix C: Biological Technical Report, Glenn Lukos Associates, Inc. (October 2018)

- d. Appendix D: Phase 1 Historical/Archaeological Resources Survey, CRM Tech, October 2018)
- e. Appendix E: Geotechnical Investigation Report, Southern California Geotechnical (December 2017)
- f. Appendix F: Phase I Environmental Site Assessment, Ardent Environmental Group, Inc. (August 23, 2017)
- g. Appendix G: Hydrology and Hydraulics Report, Omega Engineering Consultants (January 2018)
- h. Appendix H: Water Quality Management Plan, Omega Engineering Consultants (January 2018)
- i. Appendix I: Noise Impact Analysis, Eilar Associates, Inc. (September 2018)
- j. Appendix J: Traffic Impact Study, Darnell & Associates, Inc. (August 2018)

**15. Acronyms**

AB -	Assembly Bill
ARB -	Air Resources Board
AQMP -	Air Quality Management Plan
CalEEMod -	California Emissions Estimator Model
CAPCOA -	California Air Pollution Control Officer's Association
CEQA -	California Environmental Quality Act
CNEL -	Community Noise Equivalent Level
dba -	A-Weighted Decibels
EOP -	Emergency Operations Plan
FPEIR -	GP 2025 Final Programmatic Environmental Impact Report
GIS -	Geographic Information System
GHG -	Greenhouse Gas
GP 2025 -	General Plan 2025
IS -	Initial Study
LSTs -	Localized Significance Thresholds
MARB/MIP -	March Air Reserve Base/March Inland Port
MBTA -	Migratory Bird Treaty Act
MJPA-JLUS -	March Joint Powers Authority - Joint Land Use Study
MSHCP -	Multiple-Species Habitat Conservation Plan
OEM -	Office of Emergency Services
OPR -	Office of Planning & Research, State
PEIR -	Program Environmental Impact Report
RCA -	Regional Conservation Authority
RCALUC -	Riverside County Airport Land Use Commission
RCALUCP -	Riverside County Airport Land Use Compatibility Plan
RCP -	Regional Comprehensive Plan
RMC -	Riverside Municipal Code
RPD -	Riverside Police Department
RPU -	Riverside Public Utilities
RTIP -	Regional Transportation Improvement Plan
RTP -	Regional Transportation Plan
RUSD -	Riverside Unified School District
SCAG -	Southern California Association of Governments

SCAQMD -	South Coast Air Quality Management District
SCH -	State Clearinghouse
SR-	State Route
SWPPP -	Storm Water Pollution Prevention Plan
TAC -	Toxic Air Contaminant
UCR -	University of California Riverside
UNET -	University Neighborhood Enhancement Team
USGS -	United States Geologic Survey
WDR -	Waste Discharge Requirement
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
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Service
- Recreation
- Transportation/Traffic
- Tribal Resources
- Utilities/Service Systems
- 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 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 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 project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

The City of Riverside finds that the 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 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 project, nothing further is required.

Signature \_\_\_\_\_

Date \_\_\_\_\_

Printed Name & Title Matthew Taylor, Associate Planner

For City of Riverside



City of Arts & Innovation

# COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT Planning Division

## Environmental Initial Study

### EVALUATION OF ENVIRONMENTAL IMPACTS:

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

- 8) The explanation of each issue should identify:
- a. the significance criteria or threshold, if any, used to evaluate each question; and
  - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

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

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

**Less Than Significant Impact:** The City’s General Plan 2025 policies aim at balancing development interests with broader community preservation objectives. While there are no scenic vistas within the immediate project vicinity, the nearby Box Springs Mountains to the north is partially visible from the project site. Views may be partially obscured with the development of the project; however, the project is proposed within an area designated for commercial uses and surrounding properties along I-215 are developed with or zoned for similar or compatible uses. In addition, the project site and vicinity are not designated by the City’s General Plan for the preservation or uniqueness of scenic views. The project is not located within view of a scenic boulevard, parkway or special boulevard as designated by the City’s General Plan 2025. While a portion of Central Avenue is considered a Scenic Boulevard, the project is not visible from that location, and therefore will not have any effect on scenic resources within a scenic roadway. Further, Sycamore Canyon Boulevard is not listed as a scenic or special boulevard by the FPEIR (Table 5.1-A). There would be less than significant impacts to scenic vistas.

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

**No Impact:** There are no scenic highways within the City that could potentially be impacted. The nearest scenic highway is Route 243, which is approximately 25 miles east of the project site in the San Bernardino Mountains. SR-60 is not an eligible scenic highway. The proposed project is not located within view of a scenic boulevard, parkway or special boulevard as designated by the City’s General Plan 2025. While a portion of Central Avenue is considered a Scenic Boulevard, the project is not visible from that location, and therefore will not have any effect on scenic resources within a scenic roadway. Additionally, there are no significant trees, rock outcropping or historic buildings that would be impacted or removed as part of the project. Therefore, no impacts would occur.

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

**Less Than Significant Impact:** Construction of the proposed commercial buildings on the project site would alter the existing visual character of the vacant project site. However, the project site is located adjacent to an I-215 off-ramp and is in an area designated for commercial and visitor serving uses. The project would comply with all pertinent design requirements, the Zoning Code and the Citywide Design Guidelines to assure that the site design and building architecture meets City standards. The property would be modified from a vacant and unvegetated site to a commercial development with a coherent and organized site design and landscaping. Due to all these factors, direct, indirect and cumulative impacts on the visual character and quality of the area 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
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d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**1d. Response:** (Source: General Plan 2025, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines)

**Less Than Significant Impact:** The project site is undeveloped and there is currently limited sources of lighting or glare emanating from the project site. However, the project site receives nighttime illumination from vehicle headlights and street lights along Central Avenue, Sycamore Canyon Boulevard, and the I-215. Current sensitive receptors relative to lighting and glare include motorists and pedestrians. The proposed project will include installation of new lighting sources on the project site that will include exterior lighting for streetlights, parking lot illumination, and gas station canopy lighting. However, the City’s Municipal Code lighting requirements establishes design and development standards for lighting that include height, shielding, and location requirements to ensure lighting does not impact existing uses in the project area. Additionally, the installation of outdoor lighting will be required to meet the requirements of Chapter 19.556, which will reduce the potential to generate glare from new lighting fixtures. Chapter 19.590 (Performance Standards) requires that on-site lighting be arranged as to reflect away from adjoining property or any public streets. Light shall not be directed skyward or in a manner that interferes with aircraft operation. As shown in the City’s General Plan EIR Figure 5.1-2, Mt. Palomar Night Time Lighting Policy Area, the site is not within the Mount Palomar Lighting Area. The addition of new sources of permanent light and glare as a result of implementation of the project would not significantly increase ambient lighting in the project vicinity. Through compliance with the City’s Municipal Code, prior to building permit issuance, impacts related to sources of light will be less than significant.

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

**2a. Response:** (Source: California Department of Conservation, California Important Farmland Finder (<http://maps.conservation.ca.gov/ciff/ciff.html>) Accessed March 28, 2018; Figure OS-2 – Agricultural Suitability, General Plan 2025)

**No Impact:** The Project is located within an urbanized area. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 reveals that the project site is not designated as land classified as Prime Farmland, Unique

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. Therefore, the project would have no impact directly, indirectly or cumulatively to agricultural uses.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)**

**No Impact:** A review of Figure 5.2-2 – Williamson Act Preserves of 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. Moreover, the project site is not zoned for agricultural use and is not adjacent to land zoned for agricultural use; therefore, the 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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**2c. Response: (Source: GIS Map – Forest Data)**

**No Impact:** The project site is currently surrounded by roads and is characterized as a vacant lot with some brush vegetation. The project site is has a General Plan Land Use Designation of C – Commercial and will be zoned CG – Commercial General Zone. The City of Riverside has no forest land that can support 10-percent native tree cover nor does it have any timberland. Therefore, no impacts 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**2d. Response: (Source: GIS Map – Forest Data)**

**No Impact:** The project site is currently surrounded by roads and is characterized as a vacant lot with some brush vegetation. The project site is has a General Plan Land Use Designation of C – Commercial and will be zoned CG – Commercial General Zone. The City of Riverside has no forest land that can support 10-percent native tree cover nor does it have any timberland. Therefore, no impacts would occur from this project directly, indirectly or cumulatively.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**2e. Response: (Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, and GIS Map – Forest Data)**

**No Impact:** The project is located in an urbanized area of the City designated as “Other Land” by the California Department of Conservation and does not support agricultural resources or operations. The project would not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands, within proximity of the subject site. The City of Riverside has no forest land that

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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can support 10-percent native tree cover. Therefore, no impacts would occur from this project directly, indirectly or cumulatively to conversion of Farmland to non-agricultural use or to the loss of forest land.

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

3a. **Response:** (Source: *South Coast Air Quality Management District’s 2012 Air Quality Management Plan (AQMP); Sycamore Canyon Boulevard Project Air Quality and Greenhouse Gas Study prepared by Rincon Consultants, January 2018*)

**Less Than Significant Impact:** A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP relies on local city general plans’ and the Southern California Association of Governments (SCAG) Regional Transportation Plans’ (RTP) forecasts of regional population, housing, and employment growth in its own projections for managing Basin air quality. The proposed zoning for the project is General Commercial (CG).

The project entails the construction of a 3,200 square-foot convenience store, one fast food restaurant with a drive-thru (3,800 square feet), a carwash (1,518 square feet), a gas station with six two-sided gas pumps (12 multi-product dispensers), and 52 vehicle surface parking spaces for all proposed commercial uses. The project would not provide residential units that would cause a direct increase in the City’s population. While the project may provide new employment opportunities in the City of Riverside that could contribute to population growth, this contribution would be negligible. The project may employ approximately 33 persons (SCAG 2001). In its 2016 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS), SCAG projects that Riverside’s number of employees will increase to 1,175,000 by 2040; an increase of 433,000 persons relative to 2015 (SCAG 2015). Based on these estimates, project employment would constitute less than 0.01 percent of projected employment growth. Thus, the level of employment growth associated with the project was anticipated in SCAG’s long-term population forecasts, on which the 2016 AQMP was based, and would not exceed official regional employment projections. The project would be consistent with the General Plan and AQMP.

In addition, emissions generated by construction and operation of the proposed project will not exceed thresholds, which are based on the AQMP and are designed to bring the Basin into attainment for the criteria pollutants for which it is in nonattainment. Therefore, because the proposed project does not exceed any of the thresholds it will not conflict with SCAQ’s goal of bringing the Basin into attainment for all criteria pollutants and, as such, is consistent with the AQMP. As a result, impacts related to conflict with the AQMP from the proposed project will be less than significant.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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3b. **Response:** (Source: *General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District’s 2012 AQMP, CalEEMod, and Sycamore Canyon Boulevard Project Air Quality and Greenhouse Gas Study prepared by Rincon Consultants, January 2018*)

**Less Than Significant Impact:** The SCAQMD has adopted numerical thresholds to analyze the significance of a project’s construction and operational emissions. These thresholds are applicable to projects where the SCAQMD is the lead agency, but are also recommended for land use projects within the South Coast Air Basin (SCAB). These thresholds are designed such that a project consistent with the thresholds would not have an individually or

<b>ISSUES (AND SUPPORTING INFORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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cumulatively significant impact to the SCAB’s air quality. Thus, a project that does not exceed these SCAQMD thresholds would have a less than significant impact. The significance thresholds for temporary construction and long-term operational emissions in the SCAB are shown in Tables 1 and 2 respectively.

**Temporary Construction Impacts**

*Construction*

Construction activities will generate pollutant emissions from: (1) site preparation, grading, and excavation; (2) construction workers traveling to and from project site; (3) delivery and hauling of construction supplies to, and debris from, the project site; (4) fuel combustion by onsite construction equipment; (5) building construction; application of architectural coatings; and paving. The amount of emissions generated daily will vary, depending on the intensity and types of construction activities occurring.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM10, and PM2.5 emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. In addition, SCAQMD Rule 1113 requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compound emissions from use of coatings. Compliance with Rules 403 and 1113 was accounted for in the construction emissions modeling.

**Table 1 Estimated Construction Emissions Maximum Daily (lbs/day)**

Construction Year	Maximum Emissions <sup>1</sup>				
	ROG	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
2019 Maximum	7.4	48.2	30.5	5.2	2.8
SCAQMD Regional Thresholds	75	100	550	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Maximum On-site Emissions	2.6	18.9	15.3	1.1	1.0
Localized Significance Thresholds (LSTs) (On-site only)	N/A	379	5,136	75	23
<b>Threshold Exceeded?</b>	<b>N/A</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: All calculations were made using CalEEMod. See Appendix A for model results. Site Preparation, Grading, Paving, Building Construction, and Architectural Coating totals include worker trips, soil export hauling trips, construction vehicle emissions and fugitive dust. Totals may not add up due to rounding. Emission data is pulled from “mitigated” results that include compliance with regulations and project design features that will be included in the project.

1 Grading phases incorporate anticipated emissions reductions from the conditions listed above, which are required by SCAQMD Rule 403 to reduce fugitive dust. The architectural coating phases incorporate anticipated emissions reductions from the conditions listed above, which are required by Rule 1113.

2 All emissions results in this table are from the Winter emissions results, with the exception CO emissions, which are from the Summer emissions results.

Long-Term Operational Impacts

Table 2 summarizes estimated emissions associated with operation of the project. The majority of project-related operational emissions would be due to stationary emissions and vehicle trips to and from the site. As shown below, project-generated emissions would not exceed SCAQMD regional thresholds for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. The majority of operational emissions generated would be due to stationary source emissions from fuel storage and dispensing, and mobile emissions from vehicle trips to and from the project site. The CalEEMod analysis was based on estimated emissions from the whole project including trip generation emissions calculated from the traffic study completed for the project, which concluded the project would generate a total of 3,248 daily trips after accounting for pass-by trip reductions (Darnell & Associates, Inc. 2017). The project includes the installation of a vapor control device, a Healy clean air separator, to hold excess gasoline vapors from the storage

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

tanks. As shown in Table 2, emissions generated during operation of project would not exceed SCAQMD screening level thresholds for ROG, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. Therefore, the project's regional air quality impacts would be less than significant.

Emissions Source	Estimated Emissions					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area	0.3	<0.1	<0.1	<0.1	<0.1	<0.1
Stationary	9.5	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	0.3	0.3	<0.1	<0.1	<0.1
Mobile	4.4	16.9	31.9	0.1	5.8	1.6
<b>Project Total</b>	<b>14.0</b>	<b>17.2</b>	<b>32.2</b>	<b>0.1</b>	<b>5.8</b>	<b>1.6</b>
SCAQMD Thresholds	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Implementation of the proposed project would not result in any air quality exceedances of applicable short-term construction and long-term operational thresholds, and the project would be consistent with the AQMP. Projects that are consistent with the AQMP have been accounted for in regional, basin-wide emissions projections intended to achieve and maintain attainment with federal and State ambient air quality standards, and are typically assumed not to result in cumulatively considerable impacts to air quality. In addition, the project would not generate impacts related to localized CO hotspots, toxic air contaminants, or odors that would be significant. These impacts are localized to the project site and immediate vicinity, and are therefore not typically cumulative in nature. Therefore, no additional measures beyond those required by SCAQMD rules are needed to reduce project air quality impacts.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**3c. Response: Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2012 Air Quality Management Plan)**

**Less Than Significant Impact:** The portion of the Basin within which the City is located is designated as a non-attainment area for ozone, PM-10 and PM-2.5 under State standards, and as a non-attainment area for ozone, carbon monoxide, PM<sub>10</sub>, and PM<sub>2.5</sub> under Federal standards. Per the GP 2025 FPEIR, AQMP thresholds indicate future construction activities under the General Plan are projected to result in significant levels of NO<sub>x</sub> and ROG, both ozone precursors, as well as PM<sub>10</sub>, PM<sub>2.5</sub> and CO. Although long-term emissions are expected to decrease by 2025, all criteria pollutants remain above the SCAQMD thresholds.

In addition, SCAQMD's cumulative air quality impact methodology recommends that if an individual project results in air emissions of criteria pollutants (ROG, CO, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) that are below the SCAQMD's recommended daily thresholds for project-specific impacts, then it will not result in a cumulatively considerable net increase of the criteria pollutant(s) for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. As shown, in Tables 1 and 2, operation of the proposed project will not exceed SCAQMD's applicable thresholds.

Because the project is consistent with the General Plan 2025, cumulative impacts related to criteria pollutants as a result of the project were previously evaluated as part of the cumulative analysis of build out anticipated under the

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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General Plan 2025. As a result, the project would not result in any new significant impacts that were not previously evaluated and for which a statement of overriding considerations was adopted as part of the General Plan 2025 FPEIR. Therefore, cumulative air quality emissions impacts would be less than significant.

d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**3d. Response:** *(Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District’s 2012 AQMP, CalEEMod, and Sycamore Canyon Boulevard Project Air Quality and Greenhouse Gas Study prepared by Rincon Consultants, January 2018)*

Toxic Air Contaminants

**Less Than Significant Impact:** Sensitive receptors include the residences that are adjacent to the project site. The SCAQMD has developed Local Significance Thresholds (LSTs) that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus will not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NOx, CO, PM10, and PM2.5 pollutants for each of the 38 source receptor areas (SRAs) in the SCAB.

A toxic air contaminant (TAC) is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. TACs are primarily regulated through the Tanner Air Toxics Act (Assembly Bill [AB] 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). AB 1807 sets forth a formal procedure for ARB to utilize when designating substances as TACs. This procedure includes pre-designation research, public participation, and scientific peer review. Pursuant to AB 2588, existing facilities that emit air pollutants above specified levels are required to (1) prepare a TAC emissions inventory plan and report; (2) prepare a risk assessment if TAC emissions are significant; (3) notify the public of significant risk levels; and (4) if health impacts are above specified levels, prepare and implement risk reduction measures.

For purposes of CEQA, the preparation of health risk assessments (HRAs) to evaluate the human health-based consequences of TAC emissions for land use development projects may be warranted under two sets of circumstances:

- A project itself generates TACs as a result of construction and/or operational activities that may adversely impact sensitive receptors (e.g., residents), and/or
- A project is located in an area that may adversely expose sensitive receptors associated with its proposed land uses to significant concentrations of TACs from existing stationary and/or mobile sources of TACs (e.g., a fossil-fueled power plant, a high-volume freeway or roadway, a gas station, etc.).

High-volume TAC generators that are listed as potential health risk sources include the operation of commercial diesel engines and truck stops, landfills and incinerators, and chemical manufacturers (ARB 2005). The project includes the construction and operation of a gas station, which is identified in the ARB Air Quality and Land Use Handbook (2005) as a facility type that emits TACs, mainly benzene. Construction activities may also result in the generation of TACs. However, the construction period estimated for the project would be temporary and limited to approximately eight months. While gasoline-dispensing facilities account for a small part of the total benzene emissions in the City, near source exposures for large facilities, with throughputs of 3.6 million gallons per year or greater of gasoline, can be significant. The project is conservatively estimated to have a total product throughput of 2.5 million gallons per year of gasoline. Facilities with annual throughput of less than 3.6 million gallons of gasoline per year are considered typical facilities.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The ARB recommends avoiding placing large gasoline dispensing facilities within 300 feet of sensitive land uses or typical gasoline dispensing facilities within 50 feet of sensitive land uses, since health risks are drastically reduced with increasing fence-line distance between the pollutant source and receptor (ARB 2005). The center of the proposed gas station area is approximately 640 feet from the property line of the nearest sensitive receptor, which is beyond both the ARB’s recommended 300-foot distance for large facilities, and 50-foot distance for typical facilities, such as the project. Therefore, construction and operation of the proposed gas station would not expose residents in the vicinity to substantial pollutant concentrations. Furthermore, construction and operational emissions for the project would be well below the County’s criteria pollutants screening level thresholds, which are designed to be protective of public health.

Mobile emissions during project operations would primarily be comprised of passenger and light-duty vehicles accessing the gas station, convenience store, fast food restaurant, and carwash. The project would not attract a large number of trips from large or heavy-duty vehicles that could generate mobile diesel emissions due to the passenger vehicle-serving nature of the proposed use. The applicant anticipates the project would generate three estimated truck trips to the site per week for delivery of convenience store and restaurant goods, and four estimated truck trips per week for the delivery of petroleum product for distribution purposes. Therefore, construction and operation of the proposed gas station and convenience store would not generate TACs that would adversely impact sensitive receptors in the vicinity of the project site.

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above the state one-hour or eight-hour CO ambient air standards. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 ppm or the state one-hour standard of 20.0 ppm, or the state and federal 8-hour average of 9.0 ppm (ARB 2016). Intersections near the project site accommodate less than 100,000 vehicles per day based on peak hour traffic volumes collected for the project traffic study (Darnell & Associates, Inc. 2017). According to the project traffic study, existing plus project LOS for studied intersections would remain the same as existing conditions and no studied intersections would be reduced in LOS.

In addition, as shown in Table 2, the project would generate maximum daily CO emissions of approximately 32 pounds, which is well below the SCAQMD threshold of 550 pounds. Based on the low background level of CO in the project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the project’s low level of operational CO emissions, the project would not result in the creation of new hotspots or contribute substantially to existing hotspots. Impacts to sensitive receptors would be less than significant.

e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**3e. Response:** *(Source: Sycamore Canyon Boulevard Project Air Quality and Greenhouse Gas Study prepared by Rincon Consultants, January 2018)*

**Less Than Significant Impact:** The 1993 SCAQMD CEQA Air Quality Handbook identifies land uses associated with odor complaints to be agriculture uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. The project would involve the temporary use of diesel-powered construction equipment, which would generate exhaust that may be noticeable for short durations at adjacent properties. However, construction activities would be temporary, sensitive receptors are at least 640 feet from the site, and emissions would not exceed SCAQMD thresholds.

The proposed operation of a convenience store, fast food restaurant, gas station, and carwash are not typically associated with objectionable odors, although odors from fast food production and gasoline product could be

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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noticeable in the immediate vicinity of the site. The project site vicinity has sparse development and is adjacent to the I-215 off-ramp and approximately 220 feet from I-215. The nearest potential sensitive receptors are 640 feet or more from the site, and it is unlikely that the odors from the project would be distinguishable from existing sources given the vehicle emissions associated with adjacent roadways in the vicinity of the project site. Furthermore, the project would include the installation of a Healy clean air separator to hold excess gasoline vapors from the underground storage tanks, which would reduce odor impacts. Therefore, the project would not generate objectionable odors that would affect a substantial number of people and a less than significant impact would occur directly, indirectly or cumulatively for this project.

<b>4. BIOLOGICAL RESOURCES.</b> Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**4a. Response:** *(Source: Biological Technical Report for Central and Sycamore Project, prepared by Glenn Lukos Associates, Inc. June 30, 2017)*

**Less Than Significant with Mitigation Incorporated:** Because there is no potential habitat for any special-status species, the project would not impact special-status plants. The project may impact one special-status species, coastal whiptail. An individual was observed during the field visit. Given the small size and location of the Project site, no more than a few individuals of this species are expected to occur on the site. No other special-status animals are expected. The removal of coastal whiptail habitat and potential mortality to a few individuals would not be potentially significant under CEQA. In addition, coastal whiptail is a fully covered species under the MSHCP, meaning that potential impacts to the species by the project would be mitigated through compliance with the MSHCP.

The Project site occurs within the MSHCP survey area for burrowing owl. Although the site lacked potential burrows, MSHCP Objective 6 for burrowing owls requires that pre-construction surveys be conducted prior to site grading. As such, measure BIO-1 is required to avoid direct impacts to burrowing owls and to ensure consistency with the MSHCP:

**BIO-1** A qualified biologist shall conduct a pre-construction presence/absence survey for burrowing owls within 30 days prior to site disturbance. If burrowing owls are detected on-site, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the RCA and wildlife agencies.

The Project site contains vegetation with the potential to support nesting birds. The migratory bird treaty act (MBTA) and California Fish and Game Code prohibit impacts to nesting birds. The following measure is required to avoid impacts to nesting birds:

**BIO-2** Vegetation clearing shall be conducted outside of the nesting season, which is generally identified as February 1 through September 15, if feasible. If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior to any disturbance of the site, including disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.

Impacts associated with sensitive and special status species would be less than significant with mitigation incorporated.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**4b. Response:** (Source: *Biological Technical Report for Central and Sycamore Project, prepared by Glenn Lukos Associates, Inc. June 30, 2017*)

**Less Than Significant Impact:** The project would impact 2.1 acres of developed/disturbed land and would also permanently impact approximately 0.61 acre of revegetated Riversidean sage scrub. This vegetation occurs as a strip of vegetation on the cut slope adjacent to Sycamore Canyon Boulevard and is not expected to provide habitat for species that rely on sage scrub vegetation communities given its limited size and high level of disturbance. Because Riversidean sage scrub take is authorized by the MSHCP, the proposed permanent removal of 0.61 acre of Riversidean sage scrub would be a less than significant impact under CEQA.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**4c. Response:** (Source: *Biological Technical Report for Central and Sycamore Project, prepared by Glenn Lukos Associates, Inc. June 30, 2017*)

**No Impact:** The project would not impact jurisdictional waters as none are present on or directly adjacent to the Project site. No impact would occur.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**4d. Response:** (Source: *Biological Technical Report for Central and Sycamore Project, prepared by Glenn Lukos Associates, Inc. June 30, 2017*)

**No Impact:** The project site lacks migratory wildlife corridors and wildlife nursery sites and does not occur within MSHCP designated Cores or Linkages. However, the project site is located within Criteria Cell 721 of Subunit 1 of the Sycamore Canyon/Box Springs Central Area Plan. All projects located within the Criteria Area are subject to the Joint Project Review (JPR) process, where the project is reviewed by the Regional Conservation Authority (RCA) to determine overall compliance/consistency with the biological requirements of the MSHCP. The project site is not connected to natural open space and has been mechanically altered such that it supports a few remnant patches of sage scrub that no longer function as a natural vegetation community. The project would not interfere or impact (1) the movement of native resident or migratory fish or wildlife species, (2) established native resident or migratory wildlife corridors, or (3) the use of native wildlife nursery sites. No impact would occur.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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4e. **Response:** (Source: *Biological Technical Report for Central and Sycamore Project, prepared by Glenn Lukos Associates, Inc. June 30, 2017*)

**Less Than Significant Impact:** Implementation of the project is subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees. In addition, there are no existing trees within the project site. For these reasons, the project would have a less than significant impact directly, indirectly and cumulatively on local policies or ordinances protecting biological resources and tree preservation.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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4f. **Response:** (Source: *Biological Technical Report for Central and Sycamore Project, prepared by Glenn Lukos Associates, Inc. June 30, 2017; RCA Joint Project Review [JPR] 18-08-07-01, December 4, 2018*)

**Less Than Significant Impact:** The project is not directly adjacent to existing MSHCP conservation area. Proposed Constrained Linkage 7 is south of the Project site, on the south side of Central Avenue. The project has existing roads (Sycamore Canyon Boulevard and Central Avenue) and a vacant property between it and Proposed Constrained Linkage 7. The Project is not expected to result in significant indirect impacts to special-status biological resources, with the implementation of measures pursuant to the MSHCP Urban/Wildlands Interface Guidelines (*Volume 1, Section 6.1.4* of the MSHCP). These guidelines are intended to address indirect effects associated with locating projects (particularly development) in proximity to the MSHCP Conservation Area. To minimize potential edge effects, the guidelines are to be implemented in conjunction with review of individual public and private development projects in proximity to the MSHCP Conservation Area. The Project would implement measures consistent with the MSHCP guidelines to address adjacency impacts:

**Mitigation Measure:**

**BIO-3: Drainage** - projects in proximity to the MSHCP Proposed Constrained Linkage 7 and shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Proposed Constrained Linkage 7 is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Proposed Constrained Linkage 7. Stormwater systems, as applicable, shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Proposed Constrained Linkage 7. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems. The Project’s contractor shall develop a Stormwater Pollution Prevention Plan (SWPPP) to address runoff and water quality during construction such that, following the completion of construction activities, the project will not result in increased drainage to the MSHCP Proposed Constrained Linkage 7. As such, no measures would be required post-construction.

**Toxics** - Land uses proposed in proximity to the MSHCP Proposed Constrained Linkage 7 that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Proposed Constrained Linkage 7. Measures such as those employed to address drainage issues shall be implemented. As discussed above for drainage, the project shall implement a SWPPP that will address runoff during construction.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**Lighting** - Night lighting shall be directed away from the MSHCP Proposed Constrained Linkage 7 to protect species from direct night lighting. If night lighting is required during construction, shielding shall be incorporated to ensure ambient lighting in the MSHCP Proposed Constrained Linkage 7 is not increased.

**Noise** - Proposed noise generating land uses affecting MSHCP Conservation Area shall incorporate setbacks, berms or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards.

**Invasives** – The project shall avoid the use of invasive plant species in landscaping, including invasive, nonnative plant species listed in *Volume I*, Table 6-2 of the MSHCP.

As described in RCA Joint Project Review (JPR) #18-08-07-01, the project demonstrates consistency with tge applicable Sections of the MSHCP. In addition, specific Conditions of Approval recommended by the JPR have been incorporated to control adverse effects of development adjacent to the MSHCP Conservation Area in compliance with Section 6.1.4 and Appendix C of the MSHCP. Because the project would be required to implement the MSHCP adjacency guidelines, impacts would be less than significant.

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

**5a. Response:** (Source: *Phase 1 Historical/Archaeological Resources Survey prepared by CRM Tech, September 2017*)

**No Impact:** A Phase 1 Historical/Archaeological Resources Survey was prepared by CRM Tech for the project site. In preparing their report, CRM Tech conducted a record search at the Eastern Information Center (EIC) and also conducted historical background research by consulting sources such as the U.S. General Land Office land survey plat maps, the U.S. Geological Survey (USGS), and historic aerial photographs.

The property is vacant and the survey found that there are no historical resources on the property. The California Office of Historic Preservation maintains a list of California Historical Resources. Records for Riverside County historical resources indicate that no historical resources have ever been located on the project site, and the chance that unknown historic resources could be encountered during grading is extremely low. Therefore, no impacts would occur.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**5b. Response:** (Source: *GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Appendix D, Title 20 of the Riverside Municipal Code, and Phase 1 Historical/Archaeological Resources Survey prepared by CRM Tech, September 2017*)

**Less Than Significant with Mitigation Incorporated:** A Phase 1 Historical/Archaeological Resources Survey was prepared by CRM Tech for the project site. The report indicates that a prehistoric (i.e., Native American) archaeological site consisting of a bedrock outcrop with three milling slicks, 33-006002 (CARIV- 5669), was recorded in the western portion of the project area in 1995. At the time of recordation, the site was determined not to be significant under CEQA provisions, and it was subsequently destroyed during mass grading on the property. The

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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field survey results from CRM TECH confirm that Site 33-006002 is no longer extant and reveal that the entire project area has been extensively disturbed from past grading, leaving little remnant of the original ground surface. No other potential “historical resources” or “tribal cultural resources” were identified within or adjacent to the project area throughout the course of the survey.

Based on these findings, no impacts are anticipated. In the unlikely event that buried cultural materials are discovered during earth-moving operations associated with the project, impacts would be potentially significant. Therefore, pursuant to mitigation measure CR-1, the City of Riverside shall be notified immediately, and all work in the immediate vicinity would be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds. Impacts to archaeological resources would be less than significant with mitigation incorporated.

**Mitigation Measure:**

**CR-1:** Archaeological and Paleontological Monitoring: At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

The Project Archaeologist, in consultation with interested tribes, the Developer and the City, shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that would occur on the project site. Details in the Plan shall include:

- a. Project grading and development scheduling;
- b. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors’ authority to stop and redirect grading activities in coordination with all Project archaeologists;
- c. The protocols and stipulations that the Applicant, tribes and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;
- d. Treatment and final disposition of cultural and paleontological resources, sacred sites, and human remains if discovered on the project site;
- e. The scheduling and timing of the Cultural Sensitivity Training per CR-4.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**5c. Response:** (Source: General Plan 2025 Policy HP-1.3; GP 2025 FPEIR Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**Less Than Significant with Mitigation Incorporated:** Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the history of the earth and its past ecological settings. There are two types of resources: vertebrate and invertebrate paleontological resources. These resources are found in geologic strata conducive to their preservation, typically sedimentary formations. Paleontological sites are those areas that show evidence of prehuman activity. Often, they are simply small outcroppings visible on the surface or sites encountered during grading. The project area is mapped as both Quaternary older alluvium and Quaternary younger (MCC 2017), which are described below:

*Quaternary older alluvium* (Qoa) is a Pleistocene-aged (1 million to 10,000 years ago) alluvial fan deposit that typically consists of river and stream derived sediments. The sediments are comprised of unsorted clay to pebble-sized clasts that are oxidized to a reddish hue, poorly indurated, and may contain reworked material from metamorphic and igneous geologic units nearby. This unit has the potential to produce significant paleontological resources, including remains of mammoth, mastodon, camel, horse, and other Pleistocene fossils (MCC 2017).

*Quaternary younger fan* (Qyf) is a Holocene (10,000 years or younger) unit, characterized by generally loose and unconsolidated, well- to poorly-sorted deposits of varying grain sizes, deposited due to the action of rivers and streams. These units have a low potential to produce scientifically significant fossils (MCC 2017).

The County of Riverside paleontological resource sensitivity indicates that the project area has a ‘High A’ potential to produce paleontological resources during ground disturbing activities (MCC 2017). High A is based on geologic formations or mapped rock units that are known to contain (or have the correct age and depositional conditions to contain) significant paleontological resources, which could include an abundant number of vertebrate fossils, or a few significant fossils that may provide new and significant (taxonomic, phylogenetic, ecologic, and/or stratigraphic) data (MCC 2017). Because the project site is underlain by Qoa and is mapped as a high potential for paleontological resources, the project has the potential to impact paleontological resources during construction activities at depth. Therefore, Mitigation Measure CR-1 (as described in Checklist Response 5b above) has been included to require that a qualified paleontological monitor oversee excavation activities, which will reduce potential impacts to paleontological resources to a less than significant level.

d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**5d. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity)**

**Less Than Significant with Mitigation Incorporated:** No formal cemeteries are located in or near the project area. Most Native American human remains are found in association with prehistoric archaeological sites. With the exception of site CARIV-5669, which was located in the western portion of the project site and destroyed through previous grading activities, no prehistoric archaeological sites have been recorded within or near the project site. Therefore, the project has little potential to disturb human remains. However, General Plan Policy HP-1.3 states that the City shall protect sites of archaeological significance and shall ensure compliance with the Federal Native American Graves Protection and Repatriation Act in its planning and project review process. The site is listed as having high cultural resources sensitivity according to the GP 2025 EIR; therefore, mitigation measures CR-2 through CR-4 would be implemented in order to ensure that impacts to unknown resources or Tribal Cultural Resources would be less than significant with mitigation incorporated.

**Mitigation Measure**

**CR-2** Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Applicant, and interested tribes to discuss any

<b>ISSUES (AND SUPPORTING INFORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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proposed changes and review any new impacts and/or potential avoidance/ preservation of the cultural resources on the project site. The City and the Applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised.

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

**CR-4 Cultural Sensitivity Training:** The County of Riverside Certified Archaeologist and Native American Monitors shall attend the pre-grading meeting with the developer/permit holder’s contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

Impacts would be **less than significant with mitigation incorporated.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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<b>6. GEOLOGY AND SOILS.</b> Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**6i. Response:** (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR, Geotechnical Investigation Report prepared by Southern California Geotechnical December 2017)

**No Impact:** Seismic activity is to be expected in Southern California. In the City of Riverside, there are no Alquist-Priolo zones. The project site does not contain known fault lines and the potential for fault rupture or seismic shaking is low. The closest active fault is the Chino-Central Avenue Fault, which is located approximately 9.1 miles west-northwest of the site. Compliance with the California Building Code regulations would ensure that no impacts related to fault rupture would occur directly, indirectly and cumulatively.

ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**6ii. Response:** (Source: General Plan 2025 FPEIR, Geotechnical Investigation Report prepared by Southern California Geotechnical December 2017)

**Less Than Significant Impact:** The site is located within a seismically active region of southern California. The principal seismic hazard that could affect the site is ground shaking resulting from an earthquake occurring along several major active or potentially active faults in southern California. The known regional active and potentially active faults that could produce the most significant ground shaking at the site include the Chino-Central Avenue, Elsinore-Glen Ivy, Whittier, San Bernardino and San Jacinto Valley sections of the San Jacinto fault zone, the Cucamonga, and the San Jose faults. The closest active fault is the Chino-Central Avenue Fault, which is located approximately 9.1 miles west-northwest of the site.

The amount of motion expected at a building site can vary from none to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located closer to an earthquake epicenter, that consist of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude. Structures built in the City are required to be built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]) that contains provisions for earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of ground motion. Compliance with the CBC will include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structure so that it will withstand the effects of strong ground shaking. Because the proposed project will be constructed in compliance with the CBC, the proposed project will result in a less than significant impact related to strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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6iii. **Response:** (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential; Geotechnical Investigation Report prepared by Southern California Geotechnical December 2017)

**Less Than Significant Impact:** The project site is located in an area with a low risk of liquefaction per the GP 2025 Liquefaction Zones Map – Figure PS-2. The geotechnical report prepared for the project (Southern California Geotechnical; 2016) states that subsurface conditions are not conducive to liquefaction and based on conditions encountered at the project site, liquefaction is not considered to be a design concern for the project. Incorporation of the recommended design measures of the geotechnical study/preliminary soils report for compliance with the California Building Code regulations would ensure that impacts related to seismic-related ground failure, including liquefaction, are reduced to less than significant impact levels directly, indirectly and cumulatively.

iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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6iv. **Response:** (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones; Geotechnical Investigation Report prepared by Southern California Geotechnical December 2017)

**No Impact:** Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. The project site and its surroundings have generally flat topography and are not located in an area prone to landslides per Figure 5.6-1 of the General Plan 2025 Program Final PEIR. Therefore, there would be no impact related to landslides directly, indirectly and cumulatively.

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

**Less Than Significant Impact:** Construction of the project has the potential to contribute to soil erosion and the loss of topsoil. Grading and excavation activities that will be required for the proposed project will expose and loosen topsoil, which could be eroded by wind or water.

The City’s Municipal Code Titles 17 (Grading) and 18 (Subdivisions), Storm Water/Urban Runoff implement the requirements of the California RWQCB Order No. R8-2010-0033, NPDES Permit No. CAS618033 for the portion of the Santa Ana River watershed located within Riverside County, which includes the City. All projects in the City are required to conform to the permit requirements, which includes installation of Best Management Practices (BMPs) in compliance with the RWQCB permit, which establishes minimum stormwater management requirements and controls that are required to be implemented for the proposed project. To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the RWQCB regulations to be developed by a QSD (Qualified SWPPP Developer). The SWPPP is required to address site-specific conditions related to specific grading and construction activities. The SWPPP will identify potential sources of erosion and sedimentation loss of topsoil during construction, identify erosion control BMPs to reduce or eliminate the erosion and loss of topsoil, such as use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding. With compliance with the City’s Municipal Code, RWQCB requirements, and the BMPs in the SWPPP that is required to be prepared to implement the project, construction impacts related to erosion and loss of topsoil will be less than significant.

Construction of the proposed project includes installation of landscaping, such that during operation of the project substantial areas of loose topsoil that could erode will not exist. In addition, as described in Section 9, Hydrology and Water Quality the onsite drainage features that will be installed by the project includes two on-site drain systems with catch basins and grate inlets that have been designed to slow, filter, and slowly discharge stormwater into the existing offsite drainage system, which will also reduce the potential for stormwater to erode topsoil during project operations. Furthermore, implementation of the project requires City approval of a Water Quality Management Plan (WQMP), which will ensure that the City’s Municipal Code, RWQCB requirements, and appropriate operational BMPs will be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, potential impacts related to substantial soil erosion or loss of topsoil will be less than significant.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**6c. Response:** (Source: General Plan 2025 Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Geotechnical Investigation Report prepared by Southern California Geotechnical December 2017)

**Less Than Significant Impact:** The project site is relatively flat and no onsite landslides will occur. In addition, the Geotechnical Investigation determined that the potential for lateral spreading is very low. The property is located on stable ground and is not expected to experience liquefaction during a seismic event. The general topography of the subject site has an average slope of 11.8%. The project’s engineering and construction are required to be in compliance with the California Building Code and the City’s Municipal Code, Title 17 (Grading) and the policies contained in the General Plan 2025 ensure that impacts related to geologic conditions, as listed above, are reduced to less than significant impact level, 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 risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**6d. Response:** (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code, and Geotechnical Investigation Report prepared by Southern California Geotechnical December 2017)

**No Impact:** Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Structures constructed on these soils are subjected to large uplifting forces caused by the swelling. Without proper measures taken, heaving and cracking of both building foundations and slabs-on-grade could result. The geotechnical report prepared for the project states that the near-surface soils on the site are classified as low to non-expansive and therefore there would be no impact related to expansive soils directly, indirectly or cumulatively.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**6e. Response:**

**No Impact:** The proposed project will tie into existing sewers and will not use septic tanks or alternative wastewater disposal systems. As a result, impacts related to septic tanks or alternative waste water disposal systems will not occur from implementation of the proposed project.

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

**7a. Response:** (Source: Air Quality and Greenhouse Gas Study prepared by Rincon Consultants, Inc. (January 2018))

**Less Than Significant Impact:** The analysis methodologies from SCAQMD are used in evaluating potential impacts related to GHG from implementation of the proposed project. SCAQMD does not have approved thresholds; however, does have draft thresholds that provides a tiered approach to evaluate GHG impacts, which includes:

Tier 1: determine whether or not the project qualifies for any applicable exemption under CEQA

Tier 2: determine whether the project is consistent with a greenhouse gas reduction plan, which will mean that it does not have significant greenhouse gas emissions.

Tier 3: determine if the project will be below screening values; if a project’s GHG emissions are under one of the following screening thresholds, then the project is less than significant:

- All land use types: 3,000 MTCO<sub>2</sub>e per year
- Residential: 3,500 MTCO<sub>2</sub>e per year
- Mixed use: 3,000 MTCO<sub>2</sub>e per year

In addition, SCAQMD methodology for project’s construction are to average them over 30-years and then add them to the project’s operational emissions to determine if the project will exceed the screening values listed above. To determine whether the project is significant, the City of Riverside uses the conservative SCAQMD Tier 3 threshold

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

of 3,000 MTCO<sub>2</sub>e per year for all land use types. The conservative threshold of 3,000 MTCO<sub>2</sub>e per year is utilized herein to determine if emissions of greenhouse gases from this project would be significant.

Construction of the project would generate temporary GHG emissions primarily as a result of operation of construction equipment on-site, as well as from vehicles transporting construction workers to and from the project site and heavy trucks to import earth materials on-site. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling.

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating were calculated in CalEEMod. Emissions from waste generation were also calculated based on methods for quantifying GHG emissions from solid waste using the degradable organic content of waste. Emissions from water and wastewater use were based on the default electricity intensity from the California Energy Commission's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Southern California.

For mobile sources, CO<sub>2</sub> and CH<sub>4</sub> emissions from vehicle trips to and from the project site were quantified with CalEEMod and used to derive total annual project mileage.

Table 3 combines the construction, operational, and mobile GHG emissions associated with development of the project. The annual emissions would total approximately 1,694 MT of CO<sub>2</sub>e. These emissions do not exceed SCAQMD's significance threshold of 3,000 MT per year for 2020 horizon year projects. Since GHG emissions would not exceed the SCAQMD's threshold, the project would not generate a substantial increase in GHG emissions and would be consistent with AB 32. Impacts would be considered less than significant.

**Table 3 Combined Annual Emissions MT CO<sub>2</sub>e/year**

Emission Source	Project Emissions (MT CO <sub>2</sub> e)
<b>Construction</b>	8.2
<b>Operational</b>	
Area	<0.1
Energy	223
Solid Waste	34
Water	19
<b>Mobile</b>	
CO <sub>2</sub> and CH <sub>4</sub>	1,356
N <sub>2</sub> O	54
<b>Total</b>	<b>1,694</b>
<i>Threshold</i>	<i>3,000</i>
Exceeds Threshold?	No

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**7b. Response:** *(Source: Air Quality and Greenhouse Gas Study prepared by Rincon Consultants, Inc. (January 2018))*

**Less Than Significant Impact:** The SCAQMD supports State, Federal and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and rules and has established an interim greenhouse gas (GHG) threshold. The project would comply with the City’s General Plan policies and State Building Code provisions designed to reduce GHG emissions. As a user of electricity generated and sourced by Riverside Public Utilities (RPU), it is likely that the project’s GHG emissions deriving from energy use would decline over the life of the project as RPU pursues its Renewable Portfolio Standard of 33 percent retail electricity sales from renewable sources by 2020 (RRG-CAP Reduction Measure SR-1). The City of Riverside has an Economic Prosperity Action Plan and Climate Action Plan that includes policies and measures that the City implements to achieve the reduction targets required by the state’s AB 32 requirements and the statewide GHG reduction goals. The City has also adopted the California Building Code (Title 24), which includes the CalGreen requirements that require new development to reduce water and energy consumption and reduce solid waste. The project will comply with these regulations and does not include any feature that will require significant energy or water use, or otherwise interfere with implementation of these requirements.

In addition, the project would comply with all SCAQMD applicable rules and regulations during construction the construction phase and, as demonstrated in the GHG Analysis, would not interfere with the State’s goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. As concluded by the Greenhouse Gas Study, the project would not conflict with the GHG reduction strategies included in the RRG-CAP. The project would be consistent with applicable land use and zoning designations, would not conflict with State regulations intended to reduce GHG emissions statewide, and would be consistent with applicable plans and programs designed to reduce GHG emissions. Therefore, impacts would be less than significant and mitigation is not required.

<b>8. HAZARDS &amp; HAZARDOUS MATERIALS.</b> Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact:** A hazardous material is typically defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant potential hazard to human health and safety or the environment if released. Hazardous materials may include but are not limited to hazardous substances, hazardous wastes, and any material that will be harmful if released.

There are multiple state and local laws that regulate the storage, use, and disposal of hazardous materials. The Riverside County Department of Environmental Health Hazardous Materials Branch is the local administrative agency that coordinates the following programs that regulate hazardous materials and hazardous wastes: Underground Storage Tanks (UST), Above Ground Petroleum Storage Tanks, Hazardous Materials Disclosure Plan Business Plans, and California Accidental Release Program (CalARP).

The project involves the construction and operation of fuel dispensers and underground storage tanks. The City and the Riverside County Department of Environmental Health, as the Certified Unified Program Agency (CUPA), would review the project to ensure the fuel dispensing system is designed in accordance with Federal and State Water Resources Control Board (SWRCB) standards for leak detection. The transport of fuel and tank filling

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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operations would be conducted in compliance with applicable regulatory requirements. Other potentially hazardous materials associated with the fuel facility and/or car wash would be used and stored at the project site in accordance with regulatory requirements. Therefore, associated impacts would be less than significant.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**8b. Response:** (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM’s Strategic Plan; Phase I ESA prepared by Ardent Environmental Group, Inc. August 2017)

**Less Than Significant Impact:** The Phase I environmental site assessment (ESA) prepared for the site concluded that the site has been vacant since 1966 or earlier and that, because it is vacant, there are no concerns regarding asbestos containing materials (ACM) or lead based paint (LBP); nor were any other on-or-off site environmental concerns noted during either the site visit or records search. As discussed in 8a above, the City and County of Riverside DEH would review the fuel dispensing equipment and USTs against SWRCB standards for leak detection and the transport of fuel would be performed according to regulatory requirements. Impacts associated with reasonably foreseeable accident or upset conditions would be less than significant.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**8c. Response:** Response: (Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code)

**Less Than Significant Impact:** The nearest school, Hyatt Elementary School (466 Mt. Vernon Avenue, Riverside, CA 92507) is located approximately 0.5 miles north of the project site. In addition, Seneca Elementary school (11615 Wordsworth Road, Moreno Valley, CA 92557), is located one mile southeast of the project site. However, all potentially hazardous materials associated with the fuel facility and/or car wash would be used and stored at the project site in accordance with regulatory requirements. The project is not located within 0.25 miles of a school and therefore impacts would be less than significant.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**8d. Response:** (Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information, 5.7-C – DTSC EnviroStor Database Listed Sites, and Phase I Environmental Site Assessment prepared by Ardent Environmental Group, August 2017)

**No Impact:** A review of hazardous materials site lists compiled pursuant to Government Code Section 65962.5 by Ardent Environmental Group (August 2017) found that the project site is not included on any such lists. Therefore,

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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the project would have no impact with respect to creating any significant hazard to the public or environment directly, indirectly or 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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**8e. Response:** (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas; March Air Reserve/Inland Port Airport Land Use Compatibility Plan prepared on November 2014)

**Less Than Significant Impact:** The project site is more than two miles from both the Flabob Airport and Riverside Municipal Airport but is within Zone ‘E – Other Airport Environs’ of the March Air Reserve Base/Inland Port Airport. The March Air Reserve Land Use Compatibility Plan states that Zone E has a low impact with respect to noise, with occasional overflights being intrusive to some outdoor activities; Zone E also has a low risk level as these areas are within outer limits of or within occasionally use portions of flight corridors. The project was reviewed by the Airport Land Use Commission (ALUC) to ensure that the project is consistent with the compatibility zone as well as in compliance with the land use standards in the RCALUP. Because the project has been found to be consistent with the RCALUCP by the ALUC, impacts related to hazards from airports are less than significant impacts directly, indirectly and cumulatively.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**8f. Response:**

**No Impact:** There are no private airstrips within the vicinity of the project and the project does not propose a private airstrip. No impacts are anticipated.

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

**No Impact:** The project would be served by existing, fully improved streets (Central Avenue and Sycamore Canyon Boulevard) and is adjacent to an off-ramp for I-215. Public streets have been constructed to the Public Works and Fire Departments’ specifications. Pursuant to a conversation with the project engineer, it is anticipated that 25 truck trips per day would be required during the first two months of project construction (45 working days) in order to accomplish the export grading. Following the initial two months of grading, it is anticipated that the total number of construction trips would remain at approximately 25 trips per day; but would be comprised of personal trips by construction workers as well as construction material deliveries. At an average of 25 trips per day throughout the construction phase of the project, no significant impacts are anticipated with respect to impeding emergency access or interfering with an emergency evacuation plan.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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In addition, a traffic control plan is in place which would ensure public safety and provide for traffic circulation during the construction phase of the project. The traffic control plan addresses four specific instances where traffic control would be required on either Sycamore Canyon Boulevard or Central Avenue. These instances include:

1. Construction of the two project driveways. During this construction, the northbound lane of Sycamore Canyon Boulevard would be reduced from 20 to 12 feet. However, the road would remain open during the process.
2. Construction of the sidewalk along the east side of Sycamore Canyon Boulevard. Again, the northbound lane of Sycamore Canyon Boulevard would be reduced from 20 to 12 feet.
3. Construction of the traffic control measure (a median) in the center of Sycamore Canyon Boulevard. During this construction, there would be partial closures of both the northbound and southbound lanes from 20 to 12 feet.
4. During construction/trenching of utilities – This would require a 12” water main across all lanes of Central Avenue. In addition, both water and sewer lines would be trenched and installed across all lanes of Sycamore Canyon Boulevard. In both locations, steel trench plates would be utilized in order to avoid full road closures. Rather, portions of the road would be restricted as construction progresses.

The project would not block or otherwise impede travel on these streets. Therefore, the project would have no impact to an emergency response or evacuation plan.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**8h. Response:** (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside’s EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/ Part 2 and OEM’s Strategic Plan)

**Less Than Significant Impact:** While the project is located in an urbanized area, the immediate vicinity is comprised primarily of open space/wildlands. Accordingly, the General Plan 2025 Fire Hazard Areas map (Figure PS-7) designates the project site and vicinity as “Very High” hazard rating. As noted on Figure 5.7-3A – Fire Responsibility Areas, of the GP 2025 FEIR, the City has three divisions for fire responsibility within the Planning Area. The project site itself is under local responsibility for fire protection; however, the area adjacent to the project site to the north/northeast, known as Box Springs Mountain Regional Reserve, falls under the responsibility of the State of California. As discussed for 8g above, the project site is accessible via fully improved roadways and the project applicant shall comply with Fire Department recommendations for drought-resistant, fire-retardant plant species on slopes/landscaped areas to reduce the risk of brush fire and soil erosion and work with the Fire Department to control hazardous vegetation. The project would follow the City of Riverside Fire Code requirements as stated in the Municipal Code Chapter 16.32. In addition, City of Riverside Fire Station 14, located at 725 Central Avenue, is only three-quarters of a mile west of the project site. Therefore, impacts would be less than significant.

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

**9a. Response:** (Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water; Project Specific Water Quality Management Plan prepared by Omega Engineering Consultants, January 2018)

**Less Than Significant Impact:** The Santa Ana Regional Water Quality Control Board (RWQCB) administers the National Pollutant Discharge Elimination System (NPDES) permit in the region. The City is required to implement

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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all pertinent regulations of the program to control pollution discharges from new development. These regulations reduce NPS pollutant loading through the implementation of Best Management Practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water resources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and educational programs. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The project would not interfere with the implementation of NPDES water quality regulations and standards.

The proposed project would disturb approximately 2.19 gross acres of land and therefore will be subject to National Pollutant Discharge Elimination System (NPDES) permit requirements during construction activities in addition to standard NPDES operational requirements. The proposed project will require submittal to the local reviewing agency, the Santa Ana RWQCB, a Storm Water Pollution Prevention Plan (SWPPP) that will include BMPs protects water quality during construction activities. The project’s SWQMP identifies the following pollutants of concern associated with this type of land use (gasoline outlets/commercial development/automotive): Bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash & debris, and oil & grease. Therefore, the City will require BMPs as listed in the California Stormwater Quality Association’s California Storm Water Best Management Practice Handbooks. These measures, which include owner education, activity restrictions, parking lot sweeping, basin inspection, landscaping, roof runoff controls, efficient irrigation, slope and channel protection, storm drain signage, and trash storage areas, will reduce pollutants in storm water runoff and reduce non-storm water discharges to the City's storm water drainage through controlling the discharge of pollutants. Operational BMPs will be identified in a Stormwater Runoff Management Plan that will be submitted to the City for review and approval. Impacts related to violation of water quality standards will be less than significant with implementation of these existing regulations.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**9b. Response:** (Source: General Plan 2025 Table PF-3 – Western Municipal Water District Projected Domestic Water Supply (AC-FT/YR), RPU Map of Water Supply Basins, RPU Urban Water Management Plan, WMWD Urban Water Management Plan.)

**No Impact:** The project is located within the Bunker Hill Water Basin. The project is required to connect to the City’s water system (the project is within the Riverside Public Utilities Service Area) and comply with all NPDES and WQMP requirements that would ensure the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, there would be no 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, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**9c. Response:** (Source: Preliminary Grading Plan; Hydrology and Hydraulics Report prepared by Omega Engineering Consultants, January 2018)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**Less Than Significant Impact:** The project requires grading of the site which would affect the existing drainage patterns. However, a drainage plan has been designed by a registered civil engineer (see Appendix G) to safely retain, detain, and/or convey stormwater runoff.

The hydrology report identifies the fact that the site has been previously grading and is not in a natural state. The project would be subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) for the prevention of runoff during construction.

Erosion, siltation and other possible pollutants associated with long-term implementation of projects are addressed as part of the Water Quality Management Plan (WQMP) and grading permit process. Proposed on-site low impact development (LID) principles include the implementation of BMPs including landscaping and an infiltration basin. The Project-Specific Preliminary Water Quality Management Plan (PWQMP) (See Appendix F) identifies proposed drainage management areas and the effectiveness of proposed BMPs. Impacts would be less than significant.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**9d. Response: (Source: Preliminary Grading Plan; Hydrology and Hydraulics Report prepared by Omega Engineering Consultants, January 2018)**

**Less Than Significant Impact:** In the existing condition, stormwater flows overland from the northeasterly edge of the project site towards the westerly slope of the property adjacent to Sycamore Canyon Boulevard. The runoff continues draining across Sycamore Canyon Boulevards and sheet flows at the corner of Central Avenue within a gutter. It then continues to flow 2,250 feet away from the proposed development into an existing storm drain inlet.

In the proposed condition, the entire site would be graded and a drive-thru restaurant, gas station/convenience store with an attached car-wash, and associated parking and on-site circulation areas would be constructed. The proposed development footprint will be approximately 95,000 square feet. The proposed site will increase the impervious area from 0% to 65%. Onsite drainage patterns will be modified but the ultimate discharge point will remain the same. Five bioretention basins will take majority of the onsite runoff and have enough ponding depth for a high-intensity 100-year storm. Each bioretention basin will have a 4” flow control orifice and the drainage from each bioretention basin shall confluence and discharge at the southeasterly corner of the proposed site via an existing 18” reinforced concrete pipe drop inlet that runs along Central Avenue.

As analyzed in the Hydrology and Hydraulics Report, the 100-year flow for the entire site was found to be 7.0 cubic feet per second (cfs) without mitigation in the form of bioretention areas. By implementing the proposed five on-site bioretention facilities with outlet control, the flow would be reduced to 3.35 cfs. Therefore, even though the impervious surfaces of the site are increased from 0 percent to 65 percent, the project would not exceed the existing runoff peak flow during a high intensity storm event. Impacts would be less than significant.

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**9e. Response: (Source: Preliminary Grading Plan; Hydrology and Hydraulics Report prepared by Omega Engineering Consultants, January 2018)**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**Less Than Significant Impact:** The proposed development will increase the amount of impervious surface area in the City. This impervious area includes paved parking areas, sidewalks, roadways, and building rooftops; all sources of runoff that may carry pollutants and, therefore, have the potential to degrade water quality. This development has been required to prepare and implement a WQMP (Appendices G & H). Expected stormwater pollutants will be treated through the incorporation of the site design, source control and treatment control measures specified in the project specific WQMP. As was previously detailed in Response 9c, project-related stormwater flows will be directed to the proposed bioretention basins which reduces the volume and velocity of flows.

During construction, Best Management Practices (BMPs) will be implemented to prevent runoff. Therefore, as the expected pollutants will be mitigated through the project site design, source control, and treatment controls already integrated into the project design, the project will not create or contribute runoff water exceeding capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and there will be a less than significant impact directly, indirectly or cumulatively.

f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**9f. Response: (Source: Project Specific Water Quality Management Plan prepared by Omega Engineering Consultants, January 2018)**

**Less Than Significant Impact:** The project is over one acre in size and is required to have coverage under the State’s General Permit for Construction Activities (SWPPP). As stated in the Permit, during and after construction, best management practices (BMPs) will be implemented to reduce/eliminate adverse water quality impacts resulting from development. Furthermore, the City has ensured that the development does not cause adverse water quality impacts, pursuant to its Municipal Separate Storm System (MS4) permit through the project’s WQMP (Appendices G and H).

The proposed development will increase the amount of impervious surface area in the City. This impervious area includes paved parking areas, sidewalks, roadways, and building rooftops; all sources of runoff that may carry pollutants and, therefore, has the potential to degrade water quality. This development has been required to prepare preliminary BMPs that have been reviewed and approved by the Public Works Department. Final BMPs will be required prior to grading permit issuance. The purpose of this requirement is to insure treatment BMPs are installed/constructed as part of the project so that the pollutants generated by the project will be treated in perpetuity. Therefore, impacts related to degrading water quality are less than significant directly, indirectly and cumulatively.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**9g. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps 06065C-0733G)**

**No Impact:** This project does not involve the construction of housing and does not lie within a flood hazard area. There would be no impact caused by this project directly, indirectly or cumulatively as it would not place housing within a 100-year flood hazard area.

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**9h. Response:** (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps 06065C-0733G)

**No Impact:** The project site is not located within or near a 100-year flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas and the National Flood Insurance Rate Map (Map Number 06065C-0733G). Therefore, the project would not place a structure within a 100-year flood hazard area that would impede or redirect flood flows and no impact would occur directly, indirectly or cumulatively.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**9i. Response:** (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas, and FEMA Flood Hazard Maps Number 06065C-0733G)

**No Impact:** The project site is not located within or near a flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas and the National Flood Insurance Rate Map (Map Number 06065C-0335G) or subject to dam inundation as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas. Therefore, the project would not place a structure within a flood hazard or dam inundation area that would expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam and therefore no impact directly, indirectly or cumulatively would occur.

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

**No Impact:** Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis would occur directly, indirectly or cumulatively. Additionally, the project site is within an urbanized area not within proximity to Lake Mathews, Lake Evans, the Santa Ana River, Lake Hills, Norco Hills, or Box Springs Mountain Area; therefore, no impact potential for seiche or mudflow exists either directly, indirectly or cumulatively.

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

**10a. Response:** (Source: General Plan 2025 Land Use and Urban Design Element, Project site plan)

**No Impact:** Physical division of an established community can occur where a new land use, a freeway or major roadway for example, creates a physical barrier causing travel within the community to become fragmented. The project site is itself, an isolated parcel located between Sycamore Canyon Boulevard and the I-215 southbound off-ramp. However, the project is intended to serve travelers and is consistent with the C – Commercial General Plan Land Use designation and the proposed CG – Commercial general Zone. Therefore, no impacts would occur with respect to dividing an established community.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**10b. Response:** (Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Title 19 – Zoning Code)

**No Impact:** The project consists of a fueling station, convenience store, car wash, and drive-thru restaurant and is intended to serve travelers of the adjacent I-215/Moreno Valley Freeway. The project site has a General Plan Land Use designation of C – Commercial and a proposed zoning designation of (CG) Commercial General Zone. Upon approval of the proposed rezone, there would be no impact with respect to conflicts with an applicable land use plan, policy, or regulation of an agency with jurisdiction of the project.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**10c. Response:** (Source: Biological Technical Report for Central and Sycamore Project, prepared by Glenn Lukos Associates, Inc. June 30, 2017)

**Less Than Significant Impact:** As discussed above in 4f, the project is not directly adjacent to existing MSHCP conservation area; but proposed Constrained Linkage 7 is south of the Project site, on the south side of Central Avenue. The project has existing roads (Sycamore Canyon Boulevard and Central Avenue) and a vacant property between it and Proposed Constrained Linkage 7. Pursuant to mitigation measure **BIO-3**, the project would be required to implement measures pursuant to the MSHCP Urban/Wildlands Interface Guidelines (Volume I, Section 6.1.4 of the MSHCP). These guidelines are intended to address indirect effects associated with locating projects (particularly development) in proximity to the MSHCP Conservation Area. To minimize potential edge effects, the guidelines are to be implemented in conjunction with review of individual public and private development projects in proximity to the MSHCP Conservation Area. Therefore, impacts (direct, indirect, and cumulative) would be less than significant with implementation of MSHCP adjacency guidelines as conditions of approval.

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

**11a. Response:** (Source: General Plan 2025 Figure – OS-1 – Mineral Resources, California Division of Mines and Geology Surface Mining and Reclamation Policies and Procedures)

**Less Than Significant Impact:** The project is located in MRZ-4, which indicates that the presence or absence of mineral resources under the site is not known. The California Department of Conservation Division of Mines and Geology emphasizes that this does not necessarily mean that the presence of mineral resources at the site is unlikely; rather just that there is insufficient information available to determine presence or absence. However, mining operations in the City have not been active for decades and according to the Riverside General Plan EIR, the maximum potential for mineral extraction has occurred. Therefore, the project would not result in loss of availability of any known or unknown mineral resource more than currently occurs. A less than significant impact would occur.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**11b. Response:** (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)

**No Impact:** The GP 2025 FPEIR determined that there are no specific areas with the City of Sphere Area which have locally-important mineral resource recovery sites and that the implementation of the General Plan 2025 would

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

not significantly preclude the ability to extract state-designated resources. The project is consistent with the General Plan 2025. Therefore, there would be no impact.

<b>12. NOISE.</b> Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**12a. Response:** (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code, and Noise Impact Study prepared by Eilar Associates, Inc. September 2017)

**Less Than Significant Impact:** Noise levels of the proposed equipment were calculated at surrounding properties to the south and west. As there are no noise-sensitive receivers located at the sidewalk/street to the south and west, receivers have been calculated at the nearest noise-sensitive properties across Central Avenue and Sycamore Canyon Boulevard, respectively. All receivers were calculated at a height of five feet above grade, to account for the height of an average individual’s ears above the ground. Calculations include the shielding that would be provided by the proposed on-site structures as well as the topography of the site and surrounding area.

In addition, appropriate duty cycles were applied to the car wash equipment operating on site. The total duration of a typical automatic car wash is approximately 5 minutes, from start to finish. Therefore, it was assumed that a maximum of 12 car washes would take place during any given hour. Typically, the dryer unit of an automatic car wash operates for one minute out of each cycle. For this reason, the dryer unit was evaluated assuming that it would be in use for one minute per car wash, for a maximum expected duty cycle of 12 minutes per hour. This scenario would also be considered representative of a 10-minute average noise level, which is the noise metric used by the City of Riverside Noise Element. These scenarios are assumed to be a worst-case estimate of usage at the car wash. Air conditioning equipment and drive-through intercom systems have been evaluated as being operational during the entire hour. Results of the analysis are shown in Table 4 below. Construction noise is exempt from the municipal code because it is considered temporary and occurs only during the daytime hours.

**Table 4. Calculated Commercial Facility Noise Impact Levels**

Receiver Number	Receiver Location	Noise Limit (dBA)	Equipment Noise Level (dBA)
R-1	South Residential Property	60 / 45	43.2
R-2	West Property	65	45.4

As shown in Table 4 above, with the currently anticipated on-site equipment, noise levels generated at the project site are expected to comply with the most stringent applicable noise limits of the City of Riverside and the County of Riverside at the nearest residential and recreational properties. The calculated receivers represent the highest amount of noise exposure at off-site properties, and other receivers are expected to have lesser noise impacts due to added distance attenuation. No additional project design features are necessary to attenuate noise impacts.

As this analysis was conducted using typical assumptions regarding car wash equipment, it should be noted that the car wash equipment must be selected appropriately in order to maintain compliance. Provided the car wash dryer does not generate a noise level of greater than 84 A-weighted decibels (dBA) at a distance of 10 feet from the exit of the tunnel (a condition satisfied by the Mark VII rollover car wash with AquaDri E-20 dryer), noise impacts

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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generated at off-site receivers are expected to be equal to or lesser than the noise impacts projected herein. Impacts would be less than significant.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**12b. Response:** *(Source: City of Riverside Municipal Code Title 7 – Noise Control)*

**Less Than Significant Impact:** Construction of the project does not require rock blasting, pile driving, or the use of a jack hammer, but may require the use of a vibratory roller, and small bulldozer, and loaded trucks. These construction activities would be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturdays, and are prohibited on Sundays and federal holidays. Therefore, construction-related impacts related to exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels would be less than significant.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**12c. Response:** *(Source: Noise Impact Study prepared by Eilar Associates, Inc. September 2017)*

**Less Than Significant Impact:** The primary existing noise sources in the project area are transportation facilities. Vehicular traffic along I-215 is the dominant source of ambient noise and the project site lies within the 70-decibel Community Noise Equivalent Level (CNEL) Contour according to Figure N-2 of the Noise Element (General Plan 2025). A substantial permanent increase in ambient noise levels associated with the project would occur if the project would cause noise levels to increase by 3 dBA or more. 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 (GP 2025 FPEIR).

Although individual activity associated with the project may generate additional noise, as discussed in 12a above, the noise impact analysis took into account the existing ambient noise levels. As shown in Table 4 above, noise levels would not exceed exterior noise thresholds at nearby receptors.

Calculations show that, with the currently anticipated equipment (Mark VII car wash system), exterior noise levels generated at the project site are expected to comply with the applicable City of Riverside and County of Riverside daytime and nighttime noise limits at the nearest noise-sensitive property lines. With the car wash equipment selected accordingly, noise impacts at off-site receivers would be less than significant.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**12d. Response:** *(Source: City of Riverside Municipal Code Title 7 – Noise Control)*

**Less Than Significant Impact:** As discussed in checklist response 12a, construction activities are exempt pursuant to Section 7.35.020[G] of the Noise Code. Further, operational noise that would be generated by the proposed project is evaluated previously in Responses 12.a and 12.c.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
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**12e. Response:** (Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, RCALUCP)

**Less Than Significant Impact:** As discussed in 8e, the project site is more than two miles from both the Flabob Airport and Riverside Municipal Airport but is within Zone ‘E – Other Airport Environs’ of the March Air Reserve Base (ARB)/Inland Port Airport. The March Air Reserve Land Use Compatibility Plan states that Zone E has a low impact with respect to noise, with occasional overflights being intrusive to some outdoor activities. The project site is not within a noise contour area for the March ARB; therefore, impacts related to exposure of people residing or working in an airport land use plan area to excessive noise is considered less than significant directly, indirectly and cumulatively.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**12f. Response:** (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP)

**No Impact:** Per the GP 2025 Program FPEIR, there are no private airstrips within the City that would expose people working or residing in the City to excessive noise levels. Because the project is not located within proximity of a private airstrip, and does not propose a private airstrip, the project would not expose people residing or working in the City to excessive noise levels related to a private airstrip and would have no impact directly, indirectly or cumulatively.

<b>13. POPULATION AND HOUSING.</b> Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**13a. Response:** (Source: General Plan 2025 Table LU-3 – Land Use Designations)

**No Impact:** The project is intended to serve travelers of the adjacent I-215/Moreno Valley Freeway and is consistent with the General Plan and proposed Zoning for the project site. The project does not propose any residential or housing units and would not directly lead to an increase in population. The project would have no impact on population growth in the area.

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

**No Impact:** The project site is vacant and would not necessitate the removal of housing nor the construction of replacement housing elsewhere. No impact would occur with respect to existing housing, whether directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**13c. Response:** (Source: site photographs)

**No Impact:** The project site is vacant and would not necessitate the removal of housing nor the construction of replacement housing elsewhere. No impact would occur with respect to existing housing, whether directly, indirectly, or cumulatively.

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

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

**Less Than Significant Impact:** There are 14 fire stations strategically placed throughout the City. As discussed in 8h above, Fire Station 14 located at 725 Central Avenue is approximately 0.75 mile from the project site would serve the site. Since the project proposes commercial, not residential uses, the project site would not be continuously occupied by the maximum number of possible individuals. Therefore, the project would cause a minimal incremental increase in the need for fire protection services which, in and of itself, would not create the need for new or altered fire services. As with all development within the City, the project applicant shall pay applicable development impact fees to support the provision of fire services. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, impacts on the demand for additional fire facilities or services would be less than significant.

b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**14b. Response:** (Source: Riverside Police Department Field Operations Division, General Plan 2025 Figure PS-8 –Neighborhood Policing Centers, Riverside Municipal Code – Section 16.36.010 to 16.36.090)

**No Impact:** The project consists of a fueling station, with convenience store, car wash, and restaurant. Adequate police facilities and services are provided by the University Neighborhood Enhancement Team (UNET)/University of California-Riverside (UCR) Station located at 1201 University Avenue to serve this project. As with all development within the City, the project applicant shall pay applicable development impact fees to support the provision of police services. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Police Department practices, there would be no impact on the demand for additional police facilities of services either directly, indirectly or cumulatively.

c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**14c. Response:** (Source: FPEIR Figure 5.13-2 – RUSD Boundaries)

**No Impact:** Since the project proposes commercial rather than residential uses, no additional housing would be generated such that the number of school-aged children would increase as a result of the project. The project

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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applicant shall pay school development impact fees, as required pursuant to Senate Bill 50 and California Government Code, Section 65995. Through compliance with Senate Bill 50 and California Government Code, Section 65995, no impact to schools would occur.

d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**14d. Response:** (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types)

**No Impact:** The project proposes a commercial, rather than a residential use, and would not involve the addition of housing units that would permanently increase the population. Additionally, the project site is not located in an area of the City identified to have a parkland shortage. Therefore, no significant increase in demand on park uses or recreational facilities would occur. In accordance with the City’s Parks, Recreation, and Community Services-Park Planning Department, the applicant would make payment of all applicable Park Development Impact Fees (local, aquatic, regional/reserve, and trail fees) for privately developed areas. With the payment of applicable development impact fees, the project would have no impact on the demand for additional park facilities or services.

e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**14e. Response:** (Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 – Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers)

**No Impact:** Adequate public facilities and services, including libraries and community centers, are provided in and around the Sycamore Canyon/Canyon Springs Neighborhood to serve this project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Park and Recreation and Community Services and Library practices, there would be no impact on the demand for additional public facilities or services either directly, indirectly or cumulatively.

<b>15. RECREATION.</b>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**15a. Response:** (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails)

**No Impact:** The project proposes a commercial rather than a residential use and would not involve the addition of housing units that would permanently increase the population. The City’s adopted standard for developed park acreage of 3 acres per 1,000 residents would not be adversely affected. Additionally, the project site is not located in an area of the City identified to have a parkland shortage. Since the project does not include uses that would increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facilities would occur or be accelerated, this project would have no impact on existing neighborhood and regional parks.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**15b. Response:** (Source: Project Site Plans)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**No Impact:** The project would not include new recreational facilities or require the construction or expansion of recreational facilities. Additionally, the project proposes a commercial use rather than residential and would not involve the addition of housing units that would permanently increase the population. Therefore, the construction or expansion of recreational facilities in the absence of a population increase is not necessary; there would be no impact directly, indirectly or cumulatively.

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

**16a. Response:** (Source: *General Plan 2025 Circulation and Community Mobility Element; Traffic Impact Study prepared by Darnell & Associates, Inc. December 29<sup>th</sup>, 2017*)

**Less Than Significant Impact:** Consistent with the City of Riverside’s traffic study guidelines, the 2010 *Highway Capacity Manual* (HCM 2010) analysis methodologies were used to determine intersection Levels of Service (LOS) for all study area intersections. The study area intersections fall under the jurisdictions of the City of Riverside and City of Moreno Valley. For projects in conformance with the City’s General Plan, a significant project impact occurs at a study intersection when the peak hour LOS falls below LOS D (i.e., to LOS E or F) per Policy CCM-2.3 of the General Plan 2025, which strives to maintain LOS D or better on arterial streets wherever possible. The project is consistent with the existing General Plan Land Use Designation for the project site, as well as other applicable General Plan policies, and as such the Traffic Impact Analysis considers a reduction of peak hour LOS at study intersections below LOS D (i.e., LOS E or F) to be a significant impact.

Study intersections were selected based on discussion with City staff and where project traffic has the potential to cause a significant impact. The study area includes the following four intersections:

1. Sycamore Canyon Boulevard/Central Avenue;
2. Central Avenue/SR-60 Southbound On/Off Ramp;
3. Central Avenue/ SR-60 Northbound Off Ramp; and
4. Watkins Drive at Poarch/SR-60 Westbound On Ramp.

For purposes of this analysis, the following scenarios are included:

- **Existing Conditions** refers to that condition which exists on the ground today including existing traffic and existing lane configurations at roadway segments.
- **Opening Day 2019 Conditions** refers to those conditions which include the traffic volumes and lane configurations generated by Opening Day 2019 conditions in the absence of the proposed project.
- **Opening Day 2019 Plus Project Conditions** refers to those conditions which include the Opening Day 2019 traffic volumes and lane configurations plus the traffic generated by of the project.

The trip generation for the project was developed using rates from the ITE Trip Generation (9th Edition) Land Use (946) for the Service Station with C-Store and Carwash and Land Use (934) for the Fast Food Restaurant with drive thru window. The Service Station and Restaurant uses would typically draw trips from the traffic passing the site on an adjacent street. These trips are not “new” trips made for the sole purpose of visiting the site, but are trips made as

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

an intermediate stop en-route to an ultimate destination. These trips are referred to as “pass-by” trips and only affect traffic at project driveways and on streets adjacent to the project. As detailed in the traffic impact study (Appendix H) the project is expected to generate 4,332 gross daily trips; 363 AM peak hour trips and 347 PM peak hour trips. After accounting for pass-by trips, the project would generate 3,248 net new trips; 373 in the AM peak hour, and 260 net new trips in the PM peak hour.

### 2019 Opening Day Plus Project Roadway Segments

Table 5 summarizes the daily roadway segments level of service for Opening Day 2019 and Opening Day 2019 Plus Project conditions. As shown on Table 5, based on Opening Day 2019 conditions all of the roadway segments would operate at LOS D or better. Further review of Table 5 shows with the addition of project traffic all of the roadway segments would continue to operate at LOS D or better.

Roadway	Roadway Classification	LOS E Capacity	Opening Year 2019 ADT			Opening Year 2019 Plus Project			
			ADT	V/C	LOS	Project ADT	ADT	V/C	LOS
<b>Central Avenue</b>									
West of Sycamore Canyon Boulevard	4-Lane Arterial (100')	33,000	24,061	0.73	B	812	24,873	0.76	B
East of Sycamore Canyon Boulevard	4-Lane Arterial (100')	33,000	19,620	0.60	B	1,083	20,703	0.63	B
I-215 SB Ramp to I-215 NB Ramp	4-Lane Arterial (100')	33,000	19,832	0.60	B	1,147	20,979	0.64	B
<b>Sycamore Canyon Boulevard</b>									
North of Project	2-Lane Collector	12,500	5,618	0.45	B	866	6,484	0.51	B
North of Central Ave.	2-Lane Arterial	18,000	5,618	0.31	A	3,466	9,084	0.51	A
South of Central Ave.	4-Lane Arterial (88')	22,000	18,820	0.86	C	325	19,145	0.87	C
<b>Watkins Drive</b>									
Between I-215 NB Off Ramp and I-215 NB On Ramp	4-Lane Arterial (88')	22,000	19,573	0.89	D	812	19,898	0.90	D

### 2019 Opening Day Plus Project Intersection Analysis

Table 6 presents the results of the intersection analysis for 2019 Opening Day Plus Project. Review of Table 6 shows all of the intersections would operate at LOS D or better for Opening Day 2019 conditions and Opening Day 2019 plus Project Conditions. Further review of Table 6 shows the project driveways would each operate at LOS B under full access and the project’s northerly access would operate at LOS C with the southerly access restricted to right in/out movement.

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

**Table 6 – Opening Day 2019 Intersection Level of Service**

Intersection	Traffic Control	Peak Hour	Opening Year (2019)		Opening Year (2019) Plus Project		Opening Year (2019) Plus Project (RIRO** at South Proj Dwy)	
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Delay (a)	LOS (b)
Sycamore Canyon Rd & Central Ave	Signal	AM	48.8	D	52.7	D	41.3	D
		PM	49.9	D	53.0	D	34.2	C
SR-60 EB Ramps & Central Ave	Signal	AM	9.4	A	9.8	A	9.8	A
		PM	11.4	B	14.0	B	14.0	B
SR-60 WB Off-Ramp & Watkins Dr/Central Ave	Signal	AM	16.5	B	16.8	B	16.8	B
		PM	22.6	C	23.0	C	23.0	C
Watkins Dr & Poarch Rd/SR-60 WB On-Ramp	OWSC*	AM	18.7	B	20.6	C	20.6	C
		PM	13.5	B	14.2	B	14.2	B
Sycamore Canyon Rd & North Proj Dwy	OWSC	AM	n/a		15.7	C	20.3	C
		PM	n/a		12.6	B	15.1	C
Sycamore Canyon Rd & South Proj Dwy (c)	OWSC	AM	n/a		17.1	C	13.1	B
		PM	n/a		13.6	B	10.2	B

Notes:

- (a) Delays are reported as the average control delay for the entire intersection at signalized intersections and the worst movement at unsignalized intersections.
- (b) LOS calculations are based on the methodology outlined in the 2010 Highway Capacity Manual (HCM) and performed using Synchro 8.
- (c) Drawing restricted to right-in/out (RIRO).
- \*One Way Stop Control
- \*\*Right-in, Right-out.

As shown in Tables 5 & 6, all roadway segments and intersections would perform at LOS D or better during 2019 opening day plus project conditions. Since the project is consistent with the City’s General Plan and LOS D or better would be maintained under the “with the project” for the Project Opening Year 2019 and the Opening Year 2019 Plus Project scenarios, operational impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant.

b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**16b. Response: (Source: General Plan 2025 Circulation and Community Mobility Element; Traffic Impact Study prepared by Darnell & Associates, Inc. December 29, 2017)**

**Less Than Significant Impact:** As previously described in question 16a, with the addition of project traffic, all study intersections would continue to operate at LOS D or better. Based on the City of Riverside’s significance thresholds, there are no projected impacts to the study intersections from a decrease in the LOS level. The project is consistent with the Transportation Demand Management/Air Quality components of the Program. A less than significant impact would occur.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**16c. Response:** (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP)

**Less Than Significant Impact:** The project is located in Zone E of the RCALUCP for March ARB but is not within an accident potential zone (APZ). Zone E has no maximum density or people per acre and does not require open land. In addition, there are no prohibited uses with the exception of those which may be hazardous to flight. The project would not change air traffic patterns, increase air traffic levels, or change the location of air traffic patterns. As such, this project would have a less than significant impact directly, indirectly or cumulatively on air traffic patterns.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**16d. Response:** (Source: Traffic Impact Study [TIS] prepared by Darnell & Associates, Inc. December 29, 2017)

**Less Than Significant Impact:** The project proposes each driveway to function with full access movement at each driveway. The TIS evaluated the available corner sight distance looking north from the project’s proposed northerly driveway. The TIS identified 415’ feet of corner sight distance looking north from the project’s northerly driveway and 415’ feet of stopping sight distance for southbound Sycamore Canyon Boulevard traffic approaching the project’s northerly driveway.

To accommodate full access to the project and improve safety exiting the project’s driveways, the TIS recommends a channelization concept to restripe Sycamore Canyon Boulevard to provide a two-way left turn median in the vicinity of the project’s northerly driveway. The project proposes to implement the restriping to provide a two-way left turn median as part of the project design. The TIS also analyzed the project’s internal circulation, including the stacking for the carwash and fast food restaurant drive thru, and found the circulation to be satisfactory. There would be a less than significant impact.

e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**16e. Response:** (Source: Traffic Impact Study [TIS] prepared by Darnell & Associates, Inc. December 29, 2017)

**No Impacts:** As discussed for 8g and 16d above, the TIS analyzed project access and found that both access points as well as internal circulation were adequate and met minimum requirements for emergency access. There would be no impacts relative to emergency access.

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

**Less Than Significant Impact:** There is a Class 2 bikeway adjacent to the project site. The nearest public transit facility is Central + Quail Run stop of Riverside Transit Agency (RTA)’s Route 16 bus line, approximately 3,000 feet west of the Project Site on Central Avenue.. The project would not require, permanently or temporarily, the relocation or closure of any transit stops or the bikeway. The project as designed is not in conflict with adopted policies, plans, or programs supporting alternative transportation. Therefore, the project impacts related to adopted

<b>ISSUES (AND SUPPORTING INFORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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policies, plans, or programs supporting alternative transportation are less than significant directly, indirectly and cumulatively.

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

**17a. Response:** *(Source: Phase 1 Historical/Archaeological Resources Survey prepared by CRM Tech, September 2017)*

**Less Than Significant Impact:** As discussed for 5b above, the Phase 1 Historical/Archaeological Resources Survey identified a prehistoric (i.e., Native American) archaeological site consisting of a bedrock outcrop with three milling slicks, 33-006002 (CARIV- 5669), which was recorded within the project area in 1995, but was subsequently removed during mass grading on the property. No other potential “historical resources” or “tribal cultural resources” were identified within or adjacent to the project area throughout the course of the survey. Impacts would be less than significant.

<p>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.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**17b. Response:** *(Source: Phase 1 Historical/Archaeological Resources Survey prepared by CRM Tech, September 2017)*

**Less Than Significant with Mitigation Incorporated:** Please see the response to 17a above. With respect to tribal consultation pursuant to AB 52, eleven designated spokespersons for the tribes (as previously identified by the appropriate tribal government staff) were contacted. As of this time, four tribal representatives have responded in writing (see App. 2). Among them, Shasta Gaughen, Tribal Historic Preservation Officer for the Pala Band of Mission Indians, stated that the tribe had no objection to the proposed project and would defer to other tribes located in closer proximity. Ray Teran of the Viejas Band of Kumeyaay Indians wrote that the project location has “little cultural significance or ties” to the tribe. He also deferred to other tribes in closer proximity but requested to be informed of any cultural resource discoveries in the project area. The City received a request to consult from the Morongo, Pechanga, and Soboba tribes. Consultation from Morongo and Soboba has closed, however, consultation with Pechanga remains open at this time as they are reviewing the revised CR Report.

Chris Devers of the Pauma Band of Luiseño Indians noted that, while it was unfortunate that a known cultural resource (i.e., Site 33-006002) had been destroyed, the tribe was unaware of any additional resources on the property. The tribe recommended that, depending on the level of ground disturbances, “a monitoring team should be

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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used.” Jessica Mauck, Cultural Resources Analyst for the San Manuel Band of Mission Indians, found the project vicinity to be within the ancestral territory of the tribe. She recommended “a thorough land use history, and perhaps subsurface testing” to determine the likelihood of any subsurface artifact deposits.

Therefore, as discussed in 5b, mitigation measures CR-1 through CR-3 would be implemented to ensure that impacts to unknown resources or Tribal Cultural Resources would be less than significant. CR-1 requires that in the unlikely event buried cultural materials are discovered during construction, the City of Riverside would immediately be notified, and all work in the immediate vicinity would be halted or diverted until a qualified geologist can evaluate the nature and significance of the finds. While the project has little potential to disturb human remains, mitigation measures CR-2 and CR-3 require notification of any changes to project site design and/or proposed grades prior to the issuance of a grading permit, and if remains are found, that proper curation and disposition measures be followed. All mitigation measures are described in greater detail in section 5b. Implementation of these mitigation measures would reduce impacts to less than significant with mitigation incorporated.

<b>18. UTILITIES AND SYSTEM SERVICES.</b> Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**18a. Response:** (Source: General Plan 2025 Figure PF-2 – Sewer Facilities Map, FPEIR Figure 5.16-5 – Sewer Service Areas, Table 5.16-L - Estimated Future Wastewater Generation for the Planning Area Served by WMWD, Figure 5.8-1 – Watersheds, Wastewater Integrated Master Plan and Certified EIR)

**Less Than Significant Impact:** The project is within the boundaries of the Santa Ana RWQCB and subject to the Riverside County Drainage Area Management Plan. The project would connect to existing wastewater collection and conveyance facilities owned and operated by the City via sewer laterals from the project site to the main line within Central Avenue. Wastewater from the project site and vicinity would be transported to the Riverside Regional Water Quality Control Plant. The project is consistent with projections for growth, therefore, sufficient capacity is available to service to project. If an existing sewer lateral would be utilized, video inspection prior to connection would be required in accordance with the City’s Municipal Separate Storm Sewer Permit (MS4) as part of the City’s Development Review Process through the Public Works Department.

All new development is required to comply with all provisions of the NPDES program and the City’s MS4, as enforced by the RWQCB. Therefore, the project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system within the City. Because the project is required to adhere to the above regulations related to wastewater treatment the project would have a less than significant impact.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**18b. Response:** (Source: Allen Sipes, Senior Project Architect, Barghausen Consulting Engineers, Inc.)

**Less Than Significant Impact:** The car wash equipment proposed for the project is the Mark VII car wash system which uses 15 gallons of water per vehicle. The applicant anticipates servicing an average of 45 vehicles per day for a total water usage of 675 gallons. The applicant is proposing to incorporate an on-site water clarification/recycling system which would allow for 6 gallons (out of 15 gallons/vehicle) to be re-used. This would, therefore, reduce total water demand to nine gallons of fresh water per vehicle or 405 total gallons of water per day. This would be consistent with General Plan projections for this type of use and a less than significant impact would occur.

<b>ISSUES (AND SUPPORTING INFORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**18c. Response:** *(Source: (Source: FPEIR Figure 5.16-2 - Drainage Facilities)*

**Less Than Significant Impact:** The project would result in an increase of impervious surface areas. The approximately 2-acre increase in impervious surface area would generate increased storm water flows with potential to impact drainage facilities and require the provision of additional facilities. However, the Subdivision Code (Title 18, Section 18.48.020) requires drainage fees to be paid to the City for new construction. Fees are transferred into a drainage facilities fund that is maintained by Riverside County Flood Control and Water Conservation District. This Section also complies with the California Government Code (section 66483), which provides for the payment of fees for construction of drainage facilities. Fees are required to be paid as part of the conditions of approval/waiver for filing of a final map or parcel map.

General Plan 2025 Policies PF 4.1 and PF 4.3 require the City to continue to routinely monitor its storm drain system and to fund and improve those systems as identified in the City’s Capital Improvement Plan. Implementation of these policies would ensure that the City is adequately served by drainage systems. The General Plan 2025 also includes policies and programs that would minimize the environmental effects of the development of such facilities. Therefore, the project would have less than significant impact on existing storm water drainage facilities and would not require the expansion of existing facilities directly, indirectly, or cumulatively.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**18d. Response:** *(Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E– RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025)*

**Less Than Significant Impact:** The City’s Urban Water Management Plan must be updated every five years to include the most recent population trends. Similarly, the City must consult with the Western Municipal Water District regarding development projects exceeding the thresholds noted in the CEQA Guidelines Section 15155 to ensure that sufficient water supplies are available, and this review took place. A will serve letter has been provided for the project site by the Western Municipal Water District. The site is within close proximity to existing water connections that are adequately sized to serve the site. Therefore, this project was found to have a less than significant impact on water supplies either directly, indirectly or cumulatively, after consultation with the Western Municipal Water District analysis water supply assessment.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**18e. Response:** *(Source: (Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area, and Wastewater Integrated Master Plan and Certified EIR)*

**No Impact:** The project would not exceed wastewater treatment requirements of the RWQCB or RPU. The project is consistent with the General Plan 2025 Typical Growth Scenario where future wastewater generation was

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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determined to be adequate (see Table 5.16-K of the General Plan 2025 FPEIR). Further, the current Wastewater Treatment Master Plan anticipates and provides for this type of project. Therefore, no impact to wastewater treatment directly, indirectly or cumulatively would occur.

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

**No Impact:** The project is consistent with the General Plan 2025 Typical Build-out Project level where future landfill capacity was determined to be adequate (see Tables 5.16-A and 5.16-M of the General Plan 2025 FPEIR). Therefore, no impact to landfill capacity would occur directly, indirectly or cumulatively.

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

**No Impact:** The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The City is currently achieving a 60 percent diversion rate, well above State requirements. In addition, the California Green Building Code requires all developments to divert 50 percent of nonhazardous construction and demolition debris for all projects and 100 percent of excavated soil and land clearing debris for all nonresidential projects beginning January 1, 2011. The project must comply with the City's waste disposal requirements as well as the California Green Building Code and as such would not conflict with any Federal, State, or local regulations related to solid waste. Therefore, no impact related to solid waste statutes would occur directly, indirectly or cumulatively.

<b>19. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**19a. Response:** (Source: (Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, and Habitat Assessment prepared by Chambers Group in June 2006 and supplemented November 2015), FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code)

**Less Than Significant with Mitigation Incorporated:** As discussed in the Biological Resources Section of this Initial Study, because there is no potential habitat for any special-status plant species, the project would not impact

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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special-status plants. The project may impact one special-status species, coastal whiptail. An individual was observed during the field visit. Given the small size and location of the Project site, no more than a few individuals of this species are expected to occur on the site. No other special-status animals are expected. The removal of coastal whiptail habitat and potential mortality to a few individuals would not be potentially significant under CEQA. In addition, coastal whiptail is a fully covered species under the MSHCP, meaning that any potential impacts to the species by the project would be mitigated by the MSHCP.

The Project site occurs within the MSHCP survey area for burrowing owl. Although the site lacked potential burrows, MSHCP Objective 6 for burrowing owls requires pre-construction surveys prior to site grading. As such, measure **BIO-1** is required to avoid direct impacts to burrowing owls and to ensure consistency with the MSHCP. In addition, the Project site contains vegetation with the potential to support nesting birds. As discussed above, the MBTA and California Fish and Game Code prohibit impacts to nesting birds. Mitigation measure **BIO-2** is required to avoid impacts to nesting birds; while implementation of the MSHCP land use adjacency guidelines are required (BIO-3) in order to minimize potential edge/ adjacency effects.

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 in the Cultural Resources Section of this Initial Study and were found to be less than significant with implementation of mitigation measures **CR-1** through **CR-4**.

b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**19b. Response:** (Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)

**Less Than Significant Impact:** The project has either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues pursuant to CEQA. Due to the limited scope of direct physical impacts to the environment associated with the project, the project’s impacts are primarily project-specific in nature. In addition, since the project is consistent with the General Plan 2025, no new cumulative impacts are anticipated and, therefore, cumulative impacts of the project beyond those previously considered in the GP 2025 FPEIR are less than significant.

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

**Less Than Significant Impact:** The project will not consist of a use or activities that will negatively affect persons in the vicinity. All resource topics associated with the proposed project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to pose no impacts or less than significant impacts. Consequently, the project will not result in any environmental effects that will cause substantial adverse effects on human beings directly or indirectly. Cumulative impacts of the proposed projects are less than significant.

<b>ISSUES (AND SUPPORTING INFORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**Note:** Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151, Public Resources Code; Sundstrom v. County of Mendocino, 202 Cal.App.3d 296 (1988); Leonoff v. Monterey Board of Supervisors, 222 Cal.App.3d 1337 (1990).

*Staff Recommended Mitigation Measures*

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring / Reporting Method
<b>Biological Resources</b>	BIO-1: A qualified biologist shall conduct a pre-construction presence/absence survey for burrowing owls within 30 days prior to site disturbance. If burrowing owls are detected on-site, the owls shall be relocated/excluded from the site outside of the breeding season following accepted protocols, and subject to the approval of the RCA and wildlife agencies.	Prior to Grading Permit	Planning Division and Public Works Department	A Preconstruction survey shall be submitted to the City Planning Division no greater than 30 days prior to the commencement of grading activities.
<b>Biological Resources</b>	BIO-2: As feasible, vegetation clearing should be conducted outside of the nesting season, which is generally identified as February 1 through September 15. If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior to any disturbance of the site, including disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.	Prior to Grading Permit	Planning Division and Public Works Department	A Preconstruction survey shall be submitted to the City Planning Division no greater than 30 days prior to the commencement of grading activities.
<b>Biological Resources</b>	BIO -3: <b>Drainage</b> - projects in proximity to the MSHCP Proposed Constrained Linkage 7 and shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES) requirements, to ensure that the quantity and quality of runoff discharged to the MSHCP Proposed Constrained Linkage 7 is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Proposed Constrained Linkage 7. Stormwater systems, as applicable, shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Proposed Constrained Linkage 7. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems. The Project's contractor shall develop a Stormwater Pollution Prevention Plan (SWPPP) to runoff and water quality during construction. However, following the completion of activities, the Project site shall not	Prior to Grading Permit	Planning Division and Public Works Department	

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring / Reporting Method
	<p>contain any developed or paved areas, that will in any way result in increased drainage to the MSHCP Proposed Constrained Linkage 7. As such, no measures would be required post-construction.</p> <p><b>Toxics</b> - Land uses proposed in proximity to the MSHCP Proposed Constrained Linkage 7 that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Proposed Constrained Linkage 7. Measures such as those employed to address drainage issues shall be implemented. The project shall implement a SWPPP that shall address runoff during construction.</p> <p><b>Lighting</b> - Night lighting shall be directed away from the MSHCP Proposed Constrained Linkage 7 to protect species from direct night lighting. If night lighting is required during construction, shielding shall be incorporated to ensure ambient lighting in the MSHCP Proposed Constrained Linkage 7 is not increased.</p> <p><b>Noise</b> - Proposed noise generating land uses affecting MSHCP Conservation Area shall incorporate setbacks, berms or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards.</p> <p><b>Invasives</b> - Projects adjacent to the MSHCP Conservation Area (including MSHCP Proposed Constrained Linkage 7) shall avoid the use of invasive plant species in landscaping, including invasive, nonnative plant species listed in Volume I, Table 6-2 of the MSHCP.</p>			
<b>Cultural Resources</b>	CR-1: Archaeological and Paleontological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown	Prior to Grading Permit	Planning Division and Public Works Department	Submission of an Archaeological Monitoring Plan

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring / Reporting Method
	<p>archaeological resources.</p> <p>The Project Archaeologist, in consultation with interested tribes, the Developer and the City, shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the Plan shall include:</p> <ul style="list-style-type: none"> <li>a. Project grading and development scheduling;</li> <li>b. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists;</li> <li>c. The protocols and stipulations that the Applicant, tribes and project archaeologist/paleontologist shall follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;</li> <li>d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site;</li> <li>e. The scheduling and timing of the Cultural Sensitivity Training per CR-4</li> </ul>			
<b>Cultural Resources</b>	<p>CR-2: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, Applicant, and interested tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/ preservation of the cultural resources on the project site.</p>	Prior to Grading Permit	Planning Division and Public Works Department	Submission of an Archaeological Monitoring Plan

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring / Reporting Method
	The City and the Applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised.			
<b>Cultural Resources</b>	<p>CR-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 shall be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>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 shall be thoroughly inventoried with tribal monitor oversight of the process; and</li> <li>2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: <ol style="list-style-type: none"> <li>a) Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;</li> <li>b) A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County,</li> </ol> </li> </ol>	Prior to Grading Permit	Planning Division and Public Works Department	Submission of a Monitoring Report

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring / Reporting Method
	<p>to be accompanied by payment of the fees necessary for permanent curation;</p> <p>c) For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and;</p> <p>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 shall be submitted to the City of Riverside, Eastern Information Center and interested tribes:</p>			
<b>Cultural Resources</b>	<p>CR-4: Cultural Sensitivity Training: The County of Riverside Certified Archaeologist and Native American Monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</p>	Prior to Grading Permit	Planning Division and Public Works Department	Submission of a Monitoring Report