

Comments and Responses

This document provides responses to comments received during the public review period for the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the proposed Project. The Responses to Comments have been prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines to address environmental issues raised by responsible agencies and members of the public. The responses clarify, correct, or amplify the information contained in the IS/MND and identify where, if applicable, revisions to the environmental document are warranted. Collectively, the responses form part of the administrative record and are intended to assist the Lead Agency in its consideration of the Project under CEQA.

Based on consideration of the comments received, certain technical analyses have been updated, and the IS/MND is being recirculated for public review in accordance with CEQA Guidelines Section 15073.5. The recirculation is limited to those environmental topics for which new or revised information has been added in response to comments or to provide additional clarification. Other sections of the IS/MND for which no revisions were made remain unchanged and are relied upon, where applicable, in responding to comments. Accordingly, this Responses to Comments document should be read in conjunction with both the original IS/MND and the recirculated IS/MND, as applicable to the specific issue being addressed.

For purposes of this Responses to Comments document, the following terms and acronyms are used:

- **CEQA:** California Environmental Quality Act, the State statute that establishes procedures for environmental review of discretionary projects.
- **IS/MND:** Initial Study/Mitigated Negative Declaration, the environmental document prepared pursuant to CEQA that evaluates whether a project may result in significant environmental effects and identifies mitigation measures, if necessary, to reduce impacts to a less than significant level.
- **Recirculated IS/MND:** The IS/MND that has been revised and recirculated for public review to address specific updated analyses, consistent with CEQA Guidelines Section 15073.5.
- **Project:** The proposed Gas Station and Convenience Store development located at the southeast corner of Arlington Avenue and Monroe Street in the City of Riverside, including all associated discretionary approvals.
- **City:** The City of Riverside, acting as the Lead Agency under CEQA.

The presence of comments expressing concern or opposition does not, by itself, indicate the existence of a significant environmental impact. CEQA requires that the Lead Agency evaluate the potential environmental effects of the Project based on substantial evidence in the record. Where the IS/MND adequately addresses the issues raised, the City has relied on those analyses in formulating its responses. Where revisions have been made and reflected in the recirculated IS/MND, those revisions are identified in the responses, as appropriate. Public agencies, organizations, and individuals who submitted comments

during the public review period are identified in **Table 1: List of Commenting Public Agencies, Organizations, and Individuals.**

Table 1: List of Commenting Public Agencies, Persons, and Organizations

No. ¹	Letter Date	Author Name	Author Title	Agency or Organization
A.1	February 26, 2026	Sam Wang	Program Supervisor	South Coast Air Quality Management District
A.2	March 3, 2026	Rajindar Singh	Community Member	Community Member
A.3	March 3, 2026	Robert Sanchez	Community Member	Community Member
A.4	March 4, 2026	Robert Sanchez	Community Member	Community Member
A.5	March 4, 2026	Sharon Chase	Community Member	Community Member
1) For ease of reference, each comment letter has been uniquely labeled/numbered, as indicated in this table. The responses are also labeled/numbered and correlate to each comment letter.				

Comment Letter A.1, South Coast Air Quality Management District (February 26, 2026)



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

ycid@riversideca.gov

Yenifer Cid, Associate Planner

City of Riverside

3900 Main Street, 3rd Floor

Riverside, CA 92522

February 26, 2026

**Draft Mitigated Negative Declaration (Draft MND) for the
Gas Station and Convenience Store (Proposed Project)
(SCH No: 2026020582)**

The South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to comment on the above-referenced document. The City of Riverside is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD has provided a brief summary of the Proposed Project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft MND

Based on the Draft MND, the Proposed Project consists of a 4,650 square-foot (sf) convenience store, a gas station with 12 vehicle fueling positions and an underground storage tank with capacity of 40,000 gallons on an approximately 1.3 acre site. The Project site is located on the southeastern corner of Arlington Avenue and Monroe Street in the City of Riverside (City), within Riverside County (County), adjacently west of Interstate 215 (I-210) and approximately six miles east of the Interstate 15 (I-15). The Project site bounded by Arlington Street to the north, Monroe Street to the west, and residences to the east and south. Commercial uses are located to the north and west, across Arlington Street and Monroe Street.

Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptors (e.g., residential development) are located 15 feet to the east and south of the project site. Construction of the Proposed Project is anticipated to occur in approximately duration of 12 months.

South Coast AQMD Comments

Inadequacy of Qualitative Operational Health Risk Assessment

CEQA Guidelines Sections 15126.2 and 15126.4 require a CEQA document to include a description of the significant environmental effects of a Proposed Project, significant environmental effects which cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a “substantial, or potentially substantial, adverse change in the environment.” In addition to the air quality impacts from the criteria air pollutants and greenhouse gases, the adverse air quality health risk impacts associated

A.1-1

A.1-2

with increased emissions of toxic air contaminants (TACs) from all sources (including but not limited to expected future permitted stationary and portable sources, mobile sources, and other emission sources) during the operation phases need to be appropriately evaluated using qualitative and/or quantitative approaches to justify whether there will be potentially substantial adverse impacts.

The Draft MND relies on the California Air Resources Board (CARB) Air Quality and Land Use Handbook: A Community Health Perspective and the California Air Pollution Control Officers Association (CAPCOA) Gasoline Service Station Industry-Wide Risk Assessment Guidelines to conclude that operational health risks would be less than significant and that a quantitative Health Risk Assessment (HRA) is not required. Specifically, the Draft MND states that because the proposed gasoline dispensing facility would have an annual fuel throughput of less than 3.6 million gallons, a quantitative HRA is unnecessary.¹ However, the Draft MND does not contain a site-specific evaluation of operational TAC emissions that reflects the actual project configuration and proximity to nearby sensitive receptors.

According to the Air Quality Assessment, single-family residences are located immediately adjacent to the east and as close as 20 feet to the south of the Project site.² CAPCOA's screening guidance indicates that facilities meeting certain standardized assumptions, including a 50-foot receptor distance and specified fuel throughput, are expected to result in a cancer risk below 10 in one million. However, the nearest residences to the Proposed Project are substantially closer than the 50-foot receptor distance assumption by CAPCOA. Reliance solely on screening-level guidance may therefore underestimate potential cancer risk, and the Draft MND does not disclose the specific maximum annual fuel throughput proposed for the Project to demonstrate that the screening assumptions would be satisfied.

The CARB's Air Quality and Land Use Handbook explains that the recommended 50 feet separation distances are provided as guidance for land use planning agencies to reduce potential exposure to toxic air contaminant.³ The Handbook describes these distances as advisory recommendations intended to assist in planning decisions and does not state that compliance with a recommended distance eliminates the need for further project-specific evaluation. Similarly, CAPCOA's screening guidelines provide risk estimates based on standardized modeling assumptions, including a representative facility configuration, specified fuel throughput, and a 50-foot receptor distance.⁴

In addition, the Focused Health Risk Assessment states that a quantitative operational HRA was not performed because the facility is expected to have less than 3.6 million gallons per year throughput. However, the Draft MND does not disclose the maximum annual fuel throughput proposed for the Project and therefore does not demonstrate that the Project would remain below the throughput level assumed in the screening guidance.

¹ Draft MND, Appendix C – Focused Health Risk Assessment Report, p. 1.

² Appendix A – Air Quality and GHG Report.

³ CARB, Air Quality and Land Use Handbook: A Community Health Perspective: available at: [ARB's Community Health: 2005-04-00 ARB's Air Quality and Landuse Handbook: A Community Health Perspective](#), Chapter1, p. 4.

⁴ California Air Pollution Control Officers Association, Gasoline Service Station Industry-Wide Risk Assessment Guidelines, Section 2 – Methodology.

Therefore, South Coast AQMD recommends that the Lead Agency:

A.1-3

- 1) Perform a refined operational HRA using District HRA tool or dispersion modeling, including the actual site layout, dispensing equipment locations, and project-specific receptor distances (including receptors located approximately 15–20 feet from the site boundary);
- 2) Clearly define and cap the maximum annual fuel throughput in the CEQA document; and
- 3) Include the maximum throughput as an enforceable Mitigation Measure or Condition of Approval to ensure that operational emissions remain within the levels analyzed.

If modeling demonstrates that operational cancer risk exceeds the 10-in-one-million threshold, the impact would be considered potentially significant based on South Coast AQMD thresholds, and preparation of an Environmental Impact Report (EIR) or substantial revision of the MND may be required.

South Coast AQMD Air Permits and Role as a Responsible Agency

A.1-4

Since the Proposed Project includes a gasoline service station with 12 fueling positions, the facility would require a South Coast AQMD permit.⁵ Gasoline contains benzene, a recognized toxic air contaminant. Accordingly, the Lead Agency should quantify and disclose the potential health risks associated with benzene and other toxic air contaminants in the Final CEQA document, based on site-specific modeling results to ensure that nearby sensitive receptors are not exposed to significant or unmitigated health risks.

In addition, if implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,⁶ Rule 203 – Permit to Operate,⁷ Rule 401 – Visible Emissions,⁸ Rule 402 – Nuisance,⁹ Rule 403 – Fugitive Dust,¹⁰ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹¹ Rule 1113 – Architectural Coatings,¹² Regulation XIII – New Source Review,¹³ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁴ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹⁵ etc. It is important to note if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast

⁵ South Coast AQMD. Guidance for performing a gasoline dispensing station health risk assessment can be found here: <https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/iws-facilities/iws-gas-station>

⁶ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁷ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

⁸ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-401.pdf>

⁹ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-402.pdf>

¹⁰ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-403>

¹¹ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹² South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹³ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁴ South Coast AQMD, Rule 1410 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1410.pdf>

¹⁵ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

A.1-4
Cont.

Conclusion

A.1-5

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:JA

RVC260212-06

Control Number

Responses to Comment Letter A.1, South Coast Air Quality Management District (February 26, 2026)

A.1-1 This introductory comment is noted for the record and will be made available to the decision-makers for their review and consideration. Specific issues raised by the commenter are addressed in Response to Comment Nos. A.1-2 through A.1-5 below. This comment does not raise an issue regarding the adequacy of the analysis contained in the Initial Study/Mitigated Negative Declaration (IS/MND); therefore, no further response is required.

A.1-2 The comment is acknowledged and a site-specific Health Risk Assessment (HRA) was prepared for the Project in 2026 (in addition to the prior 2020 HRA). The 2026 HRA (Appendix C to the IS/MND) quantitatively evaluated both construction-related and operational toxic air contaminant (TAC) emissions, including diesel particulate matter (DPM) and fueling-related emissions, using project-specific assumptions. The TAC analysis addresses all potential sources identified in the comment including mobile and stationary sources. The HRA explicitly accounted for:

- The actual site layout and equipment configuration;
- Receptor locations immediately adjacent to the Project site, including residences located approximately 15 to 20 feet from the site boundary;
- Construction equipment emissions and operational emissions from the gasoline dispensing facility and associated sources.

Accordingly, the IS/MND air quality analysis, as updated, no longer relies solely on screening-level guidance to characterize health risk impacts. The preparation of the HRA directly addresses the concern raised by South Coast Air Quality Management District (SCAQMD) regarding the need for a refined, site-specific evaluation. The HRA evaluated short-term construction health risks associated primarily with diesel exhaust emissions from off-road construction equipment.

The HRA conservatively identified and evaluated all existing nearby sensitive receptors based on current site conditions. This included the residence immediately adjacent to the fuel pump area along Arlington Avenue, which is located approximately 15 to 20 feet from the Project site boundary. Although this residence is owned by the project applicant and is anticipated to be demolished and converted to commercial use in the future, it currently exists and was therefore included as a sensitive receptor in the health risk analysis.

Additionally, the operational health risk analysis in the Recirculated IS/MND and the 2026 HRA were based upon a defined maximum annual throughput of 3.6 million gallons per year consistent with the Project description and permitting assumptions.

Construction-Related Health Risks and Mitigation

The analysis determined that, based on conservative assumptions, unmitigated construction cancer risk could exceed SCAQMD thresholds due to the close proximity of sensitive

receptors. Mitigation requiring the use of Tier 4 (or equivalent) construction equipment was therefore incorporated as a project requirement. With implementation of Tier 4 construction equipment mitigation construction-related cancer risk would be reduced to less than significant levels. Mitigated construction health impacts would not exceed SCAQMD health risk thresholds. (See Appendix C – Health Risk Assessment Technical Report, pp. 21-23.) This mitigation measure has been included as an enforceable requirement in the Recirculated IS/MND, and its effectiveness is supported by the quantitative analysis presented in the HRA, Air Quality Report and IS/MND.

Operational Health Risk Evaluation

The HRA also evaluated long-term operational health risks associated with the proposed gasoline dispensing facility, including benzene and other TAC emissions. The analysis demonstrated that unmitigated operational cancer risk would be less than SCAQMD's significance thresholds. Therefore, operational emissions would not result in a potentially substantial adverse health impact to nearby sensitive receptors. Because operational risk levels were quantified and demonstrated to be below applicable thresholds, no operational health risk mitigation is required.

Combined Construction and Operational Health Risks

The HRA also evaluated combined construction and operational cancer risk. The analysis showed that the combined cancer risk from construction (with mitigation) and operations would remain below SCAQMD health risk thresholds. The Project would not result in a cumulatively considerable health risk impact. Therefore, the Project would not expose nearby sensitive receptors to unacceptable combined health risks.

Chronic and Acute Hazard Indices

In addition to cancer risk, the HRA evaluated chronic non-cancer hazard indices and acute hazard indices. The HRA demonstrated that both chronic and acute hazard indices would be less than significant and below applicable SCAQMD thresholds and the Project would not result in substantial non-cancer health effects.

- A.1-3** Refer to Response A.1-2, above. Regarding the first recommendation, as noted in Response A.1-2, a site-specific HRA was prepared for the Project and impacts were determined to be less than significant with construction mitigation. Regarding the second and third recommendations, the HRA includes the fuel throughput assumptions. Although the Project's maximum annual throughput is not expected to exceed 3.6 million gallons per year based on the Project description and permitting assumptions, the operational health risk analysis in the Recirculated IS/MND and the 2026 HRA conservatively assumed 4.6 million gallons per year. This conservative assumption provides a higher analytical throughput than anticipated for Project operations. The throughput limits and operational parameters used in the air quality analysis and HRA would also be reflected in, and the Project therefore constrained by,

subsequent SCAQMD permitting (e.g., gasoline dispensing facility permits). In other words, the modeled throughput is tied to the project description and permit-level design/operations that the facility must comply with independent of the California Environmental Quality Act (CEQA). Accordingly, the throughput value functions as an analytical parameter rather than a mitigation trigger, and does not need to be formalized as a mitigation measure where no significant impact has been identified. The response discloses the throughput explicitly to ensure transparency and consistency between the project description, technical analyses, and permitting framework.

Further, as no air quality impact requiring mitigation was identified, a mitigation measure limiting annual gasoline throughput would lack nexus to a project environmental impact. Such a measure would regulate commercial activity and consumer demand rather than the physical characteristics of the project, and thus would fall outside the scope of CEQA mitigation. Furthermore, compliance would require ongoing monitoring of proprietary sales data, which is not reasonably available to the lead agency. Accordingly, such a mitigation measure does not meet CEQA's standards for enforceability, effectiveness, or feasibility (CEQA Guidelines §15126.4(a)(2)).

Because the quantitative HRA demonstrates that operational risks are less than significant without mitigation, and because construction risks are mitigated to below significance through Tier 4 equipment requirements, the Lead Agency has determined that additional operational throughput caps are not required to mitigate a significant impact under CEQA. Nevertheless, fuel throughput assumptions used in the analysis are disclosed to ensure transparency and consistency with the environmental analysis.

- A.1-4** It is acknowledged that the Project would require applicable SCAQMD permits, including permits associated with the gasoline dispensing facility and any other regulated stationary or portable sources. The Project will be required to comply, and will comply, with all applicable SCAQMD rules and permitting requirements, including but not limited to rules governing gasoline dispensing facilities, diesel engines, architectural coatings, fugitive dust, and nuisance emissions. Permit compliance is a regulatory requirement independent of CEQA and does not alter the conclusions of the environmental analysis regarding significance of impacts.
- A.1-5** The CEQA record has been revised to include a project-specific quantitative HRA; mitigation for construction health risks where necessary; and substantial evidence supporting all conclusions regarding cancer risk, chronic hazard, and acute hazard. With these revisions all potential air quality health impacts have been fully evaluated and all potentially significant impacts have been mitigated to less than significant levels. The Recirculated IS/MND satisfies the requirements of CEQA Guidelines Sections 15126.2, 15126.4, and Appendix G. The Recirculated IS/MND includes discussion of applicable SCAQMD rules including Rule 402 (Nuisance), Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). If others are determined to be applicable, the Project will comply with those rules and any related permitting requirements. As this document is not a Draft EIR, the consultation procedures at

CEQA Guidelines Section 15086 are not applicable. However, the IS/MND has been noticed, circulated and is being recirculated in compliance with CEQA Guidelines Sections 15072 and 15703. This provides the SCAQMD the opportunity to provide comments to the document, to which the Lead Agency has herein responded. Accordingly, the Lead Agency concludes that adoption of the Mitigated Negative Declaration remains appropriate.

Comment Letter A.2, Rajindar Singh (March 3, 2026)

From: **Rajindar Singh** <rajindarasingh@gmail.com>

Date: Tue, Mar 3, 2026, 2:29 PM

Subject: Public comment Re: IS/MND, Planning Case PR:2021-000894

To: <ycid@riversudeca.gov>

I Rajindar Aujla Singh, am submitting a public input/rebuttal for the record in **opposition** to the potential adoption of the IS/MND and approval of the project.

A.2-1

My opinions are as such:

A.2-2

1. Why didn't the Agency's consultant prepare a full biological resource assessment (including the site walk?ground survey) when assessing the biological resource of a 1.3 acre -vacant site - the survey is meant to confirm the desktop research, and to address potential species presence or absence, and survey the the habitat for foraging and nesting potential for plants animals and birds that may visit or occupy the site.

I personally have seen Golden Eagles and Kestrels near site on numerous occasions. Also, the biological resources assessment of the IS/MND should at least contain a pre-construction nesting bird survey as a mitigation measure. I thought that was the Industry Standard for this type of site.

2. Why didn't the Agency's consultant prepare a full Health Risk Assessment (HRA) - construction + operation - instead of omitting assessment operation (when the traffic occurs and when the pumps are running) because they estimated the project would be below a reporting threshold due to proposed pump location and estimated fuel throughput.

A.2-3

3. Omitting these standard "data points" unnecessarily EXPOSES the CEQA document and project to negative board member and public review.

In closing, I fully understand that there are many areas in Riverside that have hazmat issues and development still occurred. However, there are already 6 (LUST) Leaking Underground Fuel Tank Sites in close proximity to proposed site:

A.2-4

A. 6859 Arlington site, 276 feet from proposed site.

B. 8970 Arlington Ave 1.4 miles away (near Rutland).

C. 5995 Arlington Ave 0.6 miles away (near Adams).

D. 4975 Van Buren Bl.1.2 miles away (near California ave.)

E. 4865 Van Buren Bl. 1.6 miles away (near Colorado Ave).

In addition there are over 20 Gas Stations in close proximity (Jurupa area adjacent to proposed site. Aerial hazards exist and there have been six fatal plane crashes in adjacent Neighborhood areas. This includes the proposed site where a Single Engine plane crashed on 6/7/1977 at "exact location" on empty lot at the corner of Monroe and Arlington. Please see FAA Factual Aircraft Accident Report (LAX) 77-F-A050. NTSB-MR-3-OCR.

A.2-5

In closing, there are three prong directional hazards that would cause hazardous harm to Public Safety. **1. Aerial. 2. Subsurface** with neighborhood completely enveloped by surrounding existing unmitigated sites where Ground Water Wells have been severely compromised with the potential for Birth Defects and Cancer. **3. Surface contamination:** Regional Water Quality investigations suggest that there are also hazards from Contaminant INHALATION from several LUST sites that have encircled our precious Communities. The factual existing hazards are just too numerous and would have a significant detrimental impact on the health and safety of this vibrant Community. Oversaturation could potentially lead to our area becoming a Federal Superfund site. I implore on the Planning Commission to reject further plans that would clearly pose a health and safety RISK and reject IS/MND, Planning Case PR: 2021-000894.

A.2-6

Thank you.

Cordially,
Rajindar Aujla Singh (Raj)
Senior Technical Writer
www.linkedin.com/in/rajtechwriter

Responses to Comment Letter A.2, Rajindar Singh (March 3, 2026)

A.2-1 This introductory comment is noted for the record and will be made available to the decision-makers for their review and consideration.

A.2-2 The Initial Study/Mitigated Negative Declaration (IS/MND) was prepared in accordance with the State California Environmental Quality Act (CEQA). Guidelines. CEQA does not require that biological field surveys be conducted for every project, nor does it require preparation of a biological resources technical report where substantial evidence demonstrates that a project would not result in a significant impact to biological resources (CEQA Guidelines §§ 15063, 15064).

As described in the IS/MND, Section 4, Biological Resources (pp. 14–15), the Project Site is a previously developed and disturbed parcel located within a fully urbanized area. The biological resources analysis relied on a review of applicable City and regional planning documents and mapping, including the Riverside General Plan 2025, the General Plan Final Program Environmental Impact Report (EIR), and Multiple Species Habitat Conservation Plan (MSHCP) mapping. Specifically, the analysis reviewed MSHCP Core Reserves and Linkages, Criteria Species Survey Areas, Narrow Endemic Plant Survey Areas, and Burrowing Owl Survey Areas, as well as other relevant biological resource datasets. This review determined that the Project Site does not support sensitive natural communities, riparian habitat, wetlands, wildlife corridors, or suitable habitat for special-status plant or wildlife species. Based on this substantial evidence, the IS/MND concluded that the Project would result in no impact to biological resources.

Given the highly disturbed condition of the site, its urban setting, and the absence of biological resources or suitable habitat, the lead agency determined that a site visit or focused biological surveys were not necessary to support the impact conclusions. CEQA does not require biological surveys where existing information and site conditions adequately demonstrate that biological resources are not present, and where no potentially significant impact has been identified. Under CEQA Guidelines sections 15063 and 15064, the lead agency may rely on substantial evidence in the record to determine whether a project may result in a significant impact. Where, as here, existing biological information, site conditions and planning documents demonstrate that sensitive biological resources are absent and no potentially significant biological impact has been identified, additional biological surveys are not required. The Guidelines specifically recognize that a no impact conclusion can be based on existing information rather than requiring new field surveys in every instance.

With respect to observations of raptors in the general area, birds of prey and other avian species may travel over or forage broadly within urban environments. However, occasional overflight or off-site observations do not indicate that the Project Site provides suitable nesting, roosting, or foraging habitat, nor do they constitute a biological impact under CEQA. As reflected in the IS/MND, Section 4, Biological Resources (pp. 14–15), the biological

resources evaluation appropriately focused on on-site habitat conditions, which are the relevant factors for determining potential biological resource impacts.

With respect to the comment regarding whether the IS/MND must include pre-construction nesting bird surveys as a mitigation measure, pre-construction nesting bird surveys are not required for all projects and are typically included only where construction would affect existing suitable nesting habitat and where a potentially significant impact has been identified. In this case, the IS/MND determined that the Project Site does not contain nesting habitat and that the Project would result in no impact to biological resources. Therefore, mitigation measures related to nesting birds are not required.

Notwithstanding the above, the Project remains subject to all applicable federal and State wildlife protection regulations, including the Migratory Bird Treaty Act and the California Fish and Wildlife Code, which prohibit the take or disturbance of active nests and protected species. Compliance with these regulations is required independent of CEQA.

Based on the substantial evidence in the record and the analysis contained in the IS/MND, Section 4, Biological Resources (pp. 14–15), biological resources have been adequately evaluated, and no revisions or additional mitigation measures are required in response to this comment.

A.2-3 Refer to Response A.1-2. As noted in Response A.1-2, a site-specific Health Risk Assessment (HRA) was prepared for the Proposed Project and impacts were determined to be less than significant with mitigation. The HRA and associated modeling data (we presume this is what the comment regarding omitted “data points” references) are included in the Recirculated IS/MND.

A.2-4 As discussed in the IS/MND, Section 9, Hazards and Hazardous Materials (pp. 23–24), the Project Site is not listed on hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List) and is not subject to any known active cleanup requirements (see IS/MND Section 9.d, p. 24). Accordingly, the Project Site would not create a significant hazard to the public or the environment due to its inclusion on a Cortese List site.

The IS/MND evaluated hazards and hazardous materials impacts in accordance with CEQA Guidelines Appendix G and determined that the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor through reasonably foreseeable upset or accident conditions (see Section 9.a and 9.b, IS/MND p. 23).

With respect to leaking underground storage tank (LUST) sites listed in the comment, certain of which are under active regulatory oversight, including the referenced facility located at 6859 Arlington Avenue approximately 276 feet from the Project Site, available regulatory information indicates that the nearby site is currently undergoing additional investigation under the oversight of the Regional Water Quality Control Board, including evaluation of

petroleum hydrocarbons and benzene in groundwater. Monitoring wells associated with this investigation are located near the property boundary; however, these monitoring locations reflect on-site characterization of conditions and do not, in themselves, indicate migration of contamination to the Project Site. These facilities are subject to the jurisdiction and oversight of applicable regulatory agencies, which require investigation, monitoring, and remediation, as necessary, to protect human health and the environment. Based on standard regulatory practice, such sites are required to meet cleanup objectives and closure requirements that are protective of nearby land uses. The Project will have no physical or environmental impact on these off-site facilities.

CEQA does not require a project to remediate pre-existing off-site contamination that is unrelated to a project. The IS/MND considered whether existing surrounding conditions would expose future occupants or workers on the Project Site to a significant hazard and concluded that impacts would be less than significant (see Section 9, Hazards and Hazardous Materials, pp. 23–24). In addition, the Project would be required to comply with all applicable federal, State, and local hazardous materials laws and regulations during construction and operation (see Sections 9.a and 9.b, IS/MND p. 23).

Potential exposure pathways from offsite LUST sites, including soil vapor intrusion or groundwater migration, are limited by distance, site conditions, and regulatory controls at the source sites. Although groundwater impacts have been identified at monitoring wells on the adjacent property at 6859 Arlington Avenue, there is no information from these monitoring activities that indicates that contamination has migrated onto the Project Site. Given the separation distance, intervening urban development and infrastructure, and the absence of evidence indicating an exposure pathway affecting the Project Site, no substantial risk to future occupants or workers has been identified.

In addition, potential airborne exposure to hazardous constituents was evaluated in the project-specific Health Risk Assessment (Appendix C of the IS/MND), which assessed toxic air contaminant emissions associated with construction and operation of the proposed Project and determined that health risks would be less than significant. The HRA provides a conservative assessment of inhalation exposure and does not identify a mechanism by which nearby LUST sites would result in significant health impacts to sensitive receptors at the Project Site.

Further, the Project would be required to comply with all applicable federal, State, and local hazardous materials laws and regulations during construction and operation (see Sections 9.a and 9.b, IS/MND p. 23). Accordingly, the comment does not identify new information that would alter the conclusions of the IS/MND, and no revisions to the IS/MND are required in response to this comment.

- A.2-5** The portion of the comment that notes the existence of nearby gas stations is noted, but does not identify a CEQA issue or substantive comment regarding the project and therefore does

not merit further response. With regard to the portion of the comment regarding aerial hazards, as discussed in the IS/MND, Section 9, Hazards and Hazardous Materials (p. 24), the Riverside County Airport Land Use Commission (ALUC) reviewed the Project to ensure that the Project is consistent with Airport Compatibility Zone D as well as with the land use standards in the Riverside County Airport Land Use Compatibility Plan (ALUCP), including safety compatibility criteria. On February 8, 2024, the ALUC determined that the Project is consistent, subject to specified conditions, with the ALUCP. As the Project is consistent with the ALUCP, impacts related to hazards from airports are less than significant.

A.2-6 As discussed in the IS/MND, Section 9, Hazards and Hazardous Materials (pp. 23–24), hazards and hazardous materials impacts were evaluated in accordance with CEQA Guidelines Appendix G. The analysis considered whether the Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset or accident conditions (Sections 9.a and 9.b, p. 23). Based on this evaluation, the IS/MND concluded that impacts would be less than significant.

As to the portion of this comment that relates to aerial hazards, refer to Response A.2-5 above.

With respect to subsurface conditions and nearby LUST sites (we presume that these are the referenced “ground water wells”), refer to Response A.2-4 above. The IS/MND determined that the Project Site is not listed on hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List) and is not subject to any known active cleanup requirements (Section 9.d, p. 24). CEQA does not require a project to remediate or eliminate pre-existing off-site contamination that is unrelated to the project. The IS/MND evaluated whether existing surrounding conditions would expose future occupants or workers on the Project Site to a significant hazard and determined that impacts would be less than significant (Section 9, pp. 23–24).

To the extent the comment asserts inhalation risk associated with adjacent LUST sites, the IS/MND did not identify substantial evidence of an exposure pathway from offsite contamination to the Project Site, such as documented vapor intrusion or migration of contamination onto the Project Site. Accordingly, no separate quantitative inhalation analysis of adjacent LUST sites was required or prepared under the Hazards and Hazardous Materials section.

Separately, the Recirculated IS/MND includes a project-specific Health Risk Assessment (Appendix C of the IS/MND) that evaluated construction- and operation-related toxic air contaminant emissions from the proposed Project itself, including diesel particulate matter during construction and operational emissions associated with the proposed gasoline dispensing facility. With implementation of Mitigation Measure MM HRA-1, construction-

related health risks would be reduced to less than significant levels, and operational health risks would remain less than significant.

Thus, the Health Risk Assessment evaluates inhalation risk associated with the proposed Project, while the Hazards and Hazardous Materials analysis addresses whether offsite contamination would create a significant hazard for Project occupants or workers. Based on the absence of an identified exposure pathway from adjacent LUST sites to the Project Site, and the conclusions of the project-specific Health Risk Assessment, the Project would not expose people to hazardous conditions at levels that would result in a significant environmental impact.

Accordingly, the comment does not identify new information or substantial evidence that would alter the conclusions of the IS/MND. No revisions to the IS/MND are required.

Comment Letter A.3, Robert Sanchez (March 3, 2026)

From: Robert Sanchez robertm38sanchez@yahoo.com
Sent: Tuesday, March 3, 2026 2:50 PM
To: Ward3 <Ward3@riversideca.gov>; Cid, Yenifer YCid@riversideca.gov
Cc: Robert Sanchez robertm38sanchez@yahoo.com
Subject: [EXTERNAL] Against PLANNING CASE PR: 2021-000894

Good afternoon Steven Robillard and Yenifer Cid . My residence is 4807 Monroe I, Robert Sanchez , Sanchez family and all neighbors on Monroe and surrounding neighbors strongly oppose the construction of a 7-Eleven gas station at the corner of Arlington and Monroe, and we strongly oppose a rezoning of residential property to commercial. This project will have a significant and negative impact on our community, and this concern is well-established. Known facts: Gas stations in California pose significant threats to human health and the environment, primarily through the release of toxic air contaminants, potential contamination of soil and groundwater, and, more recently, the sale of dangerous, unregulated substances. These risks are heightened for residents, workers, and children located within 500 feet of these facilities. www.conservationaction.org +3
Here are the main threats that gas stations present to humans in California:

A.3-1

1. Toxic Air Pollution (Cancer and Respiratory Risks)

- **Benzene Exposure:** Gas stations emit vapors containing benzene, a known carcinogen linked to leukemia, multiple myeloma, and non-Hodgkin lymphoma.
- **Volatile Organic Compounds (VOCs):** Vapors contain harmful substances like toluene, ethylbenzene, and xylenes (collectively BTEX), which can damage the nervous, reproductive, and respiratory systems.
- **Elevated Cancer Risk:** Studies show that living within 50–100 meters of a service station is associated with higher risks of cancer, particularly childhood leukemia.
- **High-Volume Fumes:** Research indicates that some gas station vent pipes emit far more toxic fumes than previously estimated, especially at stations where multiple pumps are in use. Beyond Toxics +4

A.3-2

2. Groundwater and Soil Contamination

- **Leaking Underground Storage Tanks (USTs):** Even modern, double-walled tanks can leak over time, allowing petroleum products to seep into soil and contaminate groundwater.
- **Toxic Cleanup Costs:** These leaks often create "petroleum brownfields," turning land unusable and costing millions to remediate.

A.3-3

- **Environmental Injustice:** Gas stations are often disproportionately located in lower-income neighborhoods and communities of color, creating heightened, inequitable health risks. CalMatters +2

A.3-3
Cont.

3. "Gas Station Heroin" and Substance Abuse

- **Synthetic Opioid Danger:** A dangerous synthetic opioid named 7-Hydroxymitragynine (7-OH), often referred to as "gas station heroin," is sold at many gas stations and smoke shops in California.
- **Fatal Overdoses:** This drug is significantly stronger than morphine and has been linked to multiple deaths in California.
- **Unregulated Products:** These products are often packaged to appeal to youth, containing tianeptine or 7-OH, which can cause severe, fatal reactions when combined with other substances. U.S. Food and Drug Administration (.gov) +2

A.3-4

4. Fire, Explosion, and Safety Hazards

- **Operational Accidents:** Accidents during fuel delivery (when tankers refill underground tanks) or car accidents at the pump can cause fires and explosions that threaten nearby residential areas.
- **Idling and Noise:** Chronic noise from vehicle traffic and diesel engines, along with increased exhaust pollution, impacts the quality of life and health for immediate neighbors. Los Angeles County - DPH (.gov) +2

A.3-5

Mitigation Efforts in California

In response to these risks, some California cities (such as Santa Rosa) have banned the construction of new gas stations to protect public health and the environment. Additionally, the state enforces strict vapor-recovery laws and requires Proposition 65 warnings about cancer and birth defects at service stations. California State Portal | CA.gov +2

A.3-6

I know for a fact that a 711-gas station will impact my neighbor's and my family's life. It's a scary thought that the city would approve a project that would have a negative impact to the community.

The purpose of the Zoning Code is to encourage, classify, designate, regulate, restrict and segregate the highest and best location and use of buildings, structures and land for agriculture, residence, commerce, trade, industry, water conservation or other purposes in appropriate places; to regulate and limit the height, number of stories and size of buildings and other structures hereafter erected or altered; to regulate and determine the size of yards and other open spaces; and, to regulate and limit the density of population and for

A.3-7

such purpose to divide the City into zones of such number, shape and area as may be deemed best suited to carry out these regulations and provide for their enforcement. Further, such regulations are deemed necessary to encourage the most appropriate use of land; to conserve and stabilize the value of property; to provide adequate open spaces for light and air and to prevent and fight fires; to prevent undue concentration of population; to lessen congestion on streets; to facilitate adequate provisions for community utilities and facilities such as transportation, water, sewerage, schools, parks and other public facilities; and, to promote the public health, safety and general welfare, all as part of the General Plan of the City.

A.3-7
Cont.

(Ord. 6966 §1, 2007) The construction of a 7-Eleven gas station would conflict with the City of Riverside's zoning codes and would not preserve the value of our residential properties. It would introduce a significant fire hazard to the homes located south of Arlington and create substantial increases in both foot and vehicle traffic along Monroe Street. This added congestion would also bring unwanted attention to our neighborhood, increasing the likelihood of crime and traffic accidents. Overall, the project does not support the safety, health, or general well-being of the community and is inconsistent with the City of Riverside's General Plan.

No family would willingly sacrifice their health or their children's health by living next to a gas station. I am confident that you, too, would not choose to live beside one. Imagine an investor purchasing homes near your property, demolishing them, and attempting to convert residentially zoned land into commercial use for a gas station. I believe you would strongly oppose such a proposal.

A.3-8

On behalf of my family and neighbors, I respectfully ask that you consider the negative impacts this project would have on our community and the wildlife that shares our neighborhood. Protecting the safety and health of our community should remain the priority.

Best Regards,
Robert M. Sanchez

Responses to Comment Letter A.3, Robert Sanchez (March 3, 2026)

A.3-1 The comment expresses generalized opposition to the project but does not state a specific concern regarding the adequacy or accuracy of the environmental analysis provided in the Initial Study/Mitigated Negative Declaration (IS/MND), or "substantial evidence" that the project would result in a significant environmental impact (California Environmental Quality Act (CEQA)) Guidelines Section 15064(f)). Because this comment does not identify a specific CEQA defect, allege a significant environmental impact, or question an analysis within the environmental document, no further response is required. The comment is noted for the record and will be forwarded to the applicable review body for their consideration prior to any final action on the Project. Specific issues raised by the commenter are addressed in Response to Comment Nos. A.3-2 through A.3-6, below.

A.3-2 Refer to Response A.1-2. As noted in Response A.1-2, a site-specific Health Risk Assessment (HRA) was prepared for the Proposed Project. The HRA quantitatively evaluated both construction-related and operational Toxic Air Contaminant (TAC) emissions, including Diesel Particulate Matter (DPM) and fueling-related emissions, using project-specific assumptions. The fueling-related emissions analysis included benzene, and other volatile organic compounds such as ethylbenzene, naphthalene, n-Hexane, and propylene. The analysis demonstrated that unmitigated operational cancer risk would be less than the South Coast Air Quality Management District (SCAQMD) significance thresholds. Therefore, the IS/MND analysis concludes that operational emissions would not result in a potentially substantial adverse health impact to nearby sensitive receptors.

A.3-3 The comment expresses concerns regarding the potential for leaking underground storage tank (LUST)s, associated groundwater and soil contamination, cleanup costs, and disproportionate impacts on environmental justice communities. As discussed in the in the Hazards and Hazardous Materials section of the IS/MND, the proposed Project Site is not listed on any hazardous materials site lists compiled pursuant to Government Code Section 65962.5, including Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and Department of Toxic Substances Control (DTSC) EnviroStor, and therefore is not identified as a contaminated or brownfield site (Section 9.d, p. 24).

With respect to LUSTs and hazardous materials, the IS/MND acknowledges that operation of a fueling station would involve the storage and use of petroleum products; however, such activities are subject to extensive federal, State, and local regulations governing the design, installation, monitoring, operation, and maintenance of underground storage tank systems, including compliance with the California Building Code, California Health and Safety Code, and oversight by applicable regulatory agencies (Sections 9.a and 9.b, p. 23). Compliance with these regulatory requirements would minimize the potential for accidental releases, and the routine transport, use, and storage of hazardous materials would therefore not create a significant hazard to the public or the environment. As evaluated in the Hazards and Hazardous Materials section of the IS/MND, potential impacts related to upset and accident

conditions are considered less than significant with adherence to existing laws and regulations (Section 9.b, p. 23).

Regarding groundwater quality, the Project would be required to comply with National Pollutant Discharge Elimination System (NPDES) requirements and implement an approved Project-Specific Water Quality Management Plan (WQMP), which includes source control and treatment best management practices such as a bioretention basin to address potential contaminants in stormwater runoff (Sections 10.a and 10.e, pp. 25–27). The IS/MND concludes that, with implementation of these measures and compliance with applicable water quality regulations, the Project would not violate water quality standards, degrade groundwater quality, or interfere with sustainable groundwater management, and impacts would be less than significant (Sections 10.a and 10.b, p. 25).

With respect to environmental justice concerns, the IS/MND evaluates potential exposure of nearby sensitive receptors to hazardous materials and pollutants and concludes that, with regulatory compliance and project design features, the Project would not result in substantial adverse effects on human health or safety (Sections 9 and 10, pp. 23–27). The CEQA analysis does not identify disproportionately high and adverse impacts on surrounding communities, and no unmitigated significant impacts related to hazards, water quality, or human health were identified (Section 21.c, p. 42).

Accordingly, the IS/MND supports adoption of a Mitigated Negative Declaration, as the Project would not result in significant impacts related to groundwater or soil contamination or environmental justice considerations.

A.3-4 The comment does not state a specific concern regarding the adequacy or accuracy of the environmental analysis provided in the IS/MND, or offer "substantial evidence" that the project would result in a significant environmental impact (CEQA Guidelines Section 15064(f)). Social impacts that do not contribute to or are not caused by physical impacts on the environment, including substance abuse, are not CEQA environmental issues. Generalized and unsubstantiated claims regarding drugs and substance abuse issues do not constitute substantial evidence. (CEQA Guidelines, Section 15384 ["Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."].)

Because this comment does not identify a specific CEQA defect, allege a significant environmental impact, or question an analysis within the environmental document, no further response is required. The comment is noted for the record and will be forwarded to the applicable review body for their consideration prior to any final action on the Project.

A.3-5 The comment also raises concerns regarding potential operational accidents associated with the proposed gasoline station use. As discussed in the IS/MND, Section 9, Hazards and

Hazardous Materials (pp. 23–24), the operation of a fueling station involves the storage and handling of petroleum products; however, such uses are subject to extensive federal, State, and local regulations governing design, installation, monitoring, and operation of fuel storage and dispensing systems, including requirements for leak detection, spill containment, and emergency shutoff systems. Compliance with these regulatory requirements, including oversight by applicable agencies, is intended to minimize the potential for accidental releases or upset conditions.

The IS/MND specifically evaluated whether the Project would create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions and concluded impacts would be less than significant (Section 9.b, p. 23). Accordingly, the potential for operational accidents has been evaluated and would not result in a significant environmental impact.

With respect to the comment regarding idling and noise, project noise impacts were analyzed in the Noise and Vibration Technical Report (2020). The technical report documented noise and groundborne vibration impacts resulting from the Project on nearby residences. The 2020 noise study was reviewed in February 2026 in light of the current Project design. The review confirmed that the original analysis remains adequate and valid for the Project. No revisions to the original noise study are warranted.

The original noise analysis evaluated Project-related traffic noise and determined that the Project would not measurably change the area's long-term noise environment. The projected increase on Arlington Avenue is approximately 0.8 A-weighted decibels (dBA) (imperceptible), and even under a conservative worst-case assumption for Monroe Street, traffic noise would not exceed the 65 dBA CNEL (Community Noise Equivalent Level) and Ldn (Day-Night Average Sound Level) contour to nearby residences. Therefore, implementation of the Project would not result in significant off-site traffic noise impacts.

Additionally, the noise analysis evaluated on-site noise and determined that the Project would generate noise levels at the nearest residences that are generally consistent with applicable exterior standards; however, intermittent nighttime engine start-ups could exceed the nighttime threshold. To avoid potential exceedances at the nearest homes to the east, the Project would include a stand-alone noise barrier with a height of 6 feet along the project's eastern property line, which is incorporated as a project feature in the IS/MND (Section 13.a, pp. 29–31).

With regard to the portion of the comment regarding increased exhaust pollution from vehicles, air quality emissions were also analyzed in the IS/MND and emissions were modeled with the SCAQMD-recommended California Emissions Estimator Model (CalEEMod) and gas station volatile organic compound (VOC) emissions were modeled with the United States Environmental Protection Agency (U.S. EPA)'s potential to emit calculator for gasoline dispensing facilities. As noted in the IS/MND and supporting air quality assessment, Project

emissions would not exceed SCAQMD mass emission thresholds or localized significance thresholds and impacts would be less than significant.

A.3-6

With regard to the portion of the comment regarding gas station bans in other jurisdictions, the comment does not state a specific concern regarding the adequacy or accuracy of the environmental analysis provided in the IS/MND, or "substantial evidence" that the project would result in a significant environmental impact (CEQA Guidelines Section 15064(f)). General information regarding inapplicable regulations from other cities does not constitute substantial evidence. While some jurisdictions in California have adopted local policy decisions to restrict or prohibit new gas stations, such actions are local legislative determinations and are not requirements of state law or CEQA. The City of Riverside has not adopted a prohibition on new gasoline service stations, and the Proposed Project is evaluated based on existing adopted regulations and standards applicable within the City's jurisdiction. With regard to the portion of the comment regarding state laws concerning air quality, the Project has been evaluated under CEQA and, as approved, would be required to comply with all applicable federal, state, regional, and local laws and regulations, including those governing air quality, toxic air contaminants, and public health protections. Specifically, the Project would be subject to and required to comply with all applicable SCAQMD rules and permitting requirements, including regulations governing gasoline dispensing facilities and vapor control systems. These regulations include state-mandated vapor recovery requirements that are designed to minimize gasoline vapor emissions during fuel storage, transfer, and dispensing operations.

In addition, the Project would be required to comply with California Proposition 65 requirements, including the provision of warnings related to potential exposure to chemicals known to the State of California to cause cancer or reproductive harm, as applicable. Compliance with Proposition 65 is a statewide legal requirement and is independent of CEQA approval.

The Project has been evaluated under CEQA and, as approved, would be required to comply with all applicable federal, state, regional, and local laws and regulations, including those governing air quality, toxic air contaminants, and public health protections.

As demonstrated in the environmental analysis and the project-specific Health Risk Assessment prepared in response to public comments, the Project's construction and operational health risks would be less than significant, with construction risks mitigated through required measures and operational risks remaining below applicable SCAQMD health risk thresholds. Accordingly, compliance with existing regulatory requirements, including vapor recovery laws and other air quality controls, provides substantial evidence supporting the conclusion that the Project would not result in significant public health impacts.

A.3-7

The Project would require approval of a General Plan Amendment (GPA) and Rezone. Upon approval of these entitlements, the Project would be consistent with the City's General Plan

and Zoning Code. As discussed in IS/MND Section 11, Land Use and Planning (pp. 27-28), the Project is also aligned with numerous General Plan goals and policies. In addition, the Project would provide several community benefits, including development of a commercial use along Arlington Avenue that is compatible with the roadway's classification and traffic context, the provision of services and economic benefits to the City, and the creation of a transitional buffer between Arlington Avenue and adjacent residential neighborhoods. Refer to IS/MND, Section 11, Land Use and Planning (pp. 27-28).

As discussed in the IS/MND, Section 9, Hazards and Hazardous Materials (pp. 24-25) and Section 20, Wildfire (p. 41), the Project Site is not within a State Responsibility Area or a Very High Fire Severity Zone. Based on this substantial evidence, the IS/MND concluded that the Project would result in no wildfire-related impacts.

Traffic impacts were analyzed in the Traffic Impact Analysis (2025). As discussed in the IS/MND, Section 17, Transportation, roadway capacity is adequate to accommodate the Project's projected traffic volumes. Increased pedestrian activity is not a CEQA issue.

As discussed in Response A.3-4, social impacts that do not contribute to or are not caused by physical impacts on the environment, such as criminal activity, are not CEQA environmental issues. Regardless, the claim that the Project will increase criminal activity is unsubstantiated by any evidence in the record. (CEQA Guidelines, Section 15384 ["Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."].) As such, the comment does not state a specific concern regarding the adequacy or accuracy of the environmental analysis provided in the IS/MND, or offer "substantial evidence" that the project would result in a significant environmental impact (CEQA Guidelines Section 15064(f)).

A.3-8 The comment does not state a specific concern regarding the adequacy or accuracy of the environmental analysis provided in the IS/MND, or offer "substantial evidence" that the project would result in a significant environmental impact (CEQA Guidelines Section 15064(f)). Because this comment does not identify a specific CEQA defect, allege a significant environmental impact, or question an analysis within the environmental document, no further response is required. This comment is noted for the record and will be made available to the decision-makers for their review and consideration.

Comment Letter A.4, Robert Sanchez (March 4, 2026)

From: Robert Sanchez <robertm38sanchez@yahoo.com>

Sent: Wednesday, March 4, 2026 1:56 PM

To: Ward3 <Ward3@riversideca.gov>; Cid, Yenifer <YCid@riversideca.gov>

Cc: Robert Sanchez <robertm38sanchez@yahoo.com>

Subject: [EXTERNAL] Re: Against PLANNING CASE PR: 2021-000894

Good afternoon Steven Robillard and Yenifer Cid.





The trees in our neighborhood at the southeast corner of Arlington and Monroe—south of Arlington and east of Monroe—are an important habitat for local wildlife. The eucalyptus trees, many of them over 75 feet tall, provide essential nesting areas for several bird species that rely on the high treetops for safety. Recently, my daughter and I rescued a hawk that had fallen from one of these trees and brought it to the Sunshine Wildlife Rehabilitation Center, which shows just how active this habitat is. These trees also serve as a natural windbreak. As you know, the winds south of Arlington can be very strong, and the tree line provides significant protection for the surrounding homes. I’m sharing these pictures of my home surrounded by trees so you can get a better idea of what I’m talking about, as well as some proof of the wildlife I’ve encountered.

Extreme fire hazard is one of many major concerns we have. The state of California does **not** recommend having gas stations near eucalyptus trees, as it creates an extreme fire risk. Eucalyptus trees are highly flammable, often called "gasoline trees" due to their oily, peeling bark.

Key Considerations:

- **Extreme Fire Hazard:** Eucalyptus trees (especially Blue Gum) contain volatile oils, shed bark, and create large amounts of dry fuel, making them a significant hazard near potential ignition sources like gas stations.
- **"Gasoline Tree" Risk:** Their bark can catch fire easily, carrying embers and causing fire to jump into the canopy.
- **Structural Damage:** Their roots are aggressive, posing a risk to underground pipes and foundations, which could cause further issues near a gas station.

With the information I’m sharing, we hope to paint a clearer picture of the risks that come with placing a gas station next to our homes. We do not want to see a disaster like the recent LA fire happen anywhere else—especially not in our neighborhood. We strongly oppose the construction of a fuel station at the southeast corner of Arlington and Monroe. This area is zoned residential for a reason, and it should remain that way for the safety and well-being of everyone who lives here.

Best Regards,

Robert M. Sanchez

Responses to Comment Letter A.4, Robert Sanchez (March 4, 2026)

A.4-1 The City acknowledges the commenter’s observations regarding existing eucalyptus trees and wildlife activity in the surrounding neighborhood, and has reviewed the photographs submitted with this comment. The images depict off-site residential landscaping and anecdotal wildlife observations, which do not alter the biological resources analysis or conclusions presented in the Initial Study/Mitigated Negative Declaration (IS/MND). As evaluated in the IS/MND, Section 4, Biological Resources, the Project Site is previously disturbed, located within a fully urbanized area, and contains limited ornamental vegetation, including some shrubs and trees (Section 4.a, p. 14). The IS/MND determined that, despite the presence of this vegetation, the Project Site does not contain riparian habitat, sensitive natural communities, or habitat for special-status species, and that implementation of the Project would not result in a substantial adverse effect on wildlife resources (Sections 4.a and 4.b, pp. 14–15).

While birds and other urban-adapted wildlife may utilize trees located off-site within the surrounding residential neighborhood, the presence of common wildlife or anecdotal observations of individual animals does not, in itself, indicate the presence of sensitive biological resources as defined under the California Environmental Quality Act (CEQA). As detailed in the IS/MND, the Project would not remove or directly disturb off-site vegetation located on private residential properties, nor would it substantially interfere with wildlife movement, nesting habitat, or established wildlife corridors (Sections 4.d and 4.f, pp. 15–16). Accordingly, impacts related to biological resources were determined to be less than significant.

A.4-2 The City acknowledges the commenter’s concerns regarding fire hazards associated with eucalyptus trees located in proximity to the Project Site and has reviewed the information provided regarding vegetation and surrounding site conditions. As evaluated in the IS/MND, the Project Site is located within a fully urbanized area and is not located within a State Responsibility Area or a Very High Fire Hazard Severity Zone (Section 20.a, p. 41; Section 20.b, p. 41). The Wildfire section of the IS/MND concludes that the Project would not expose people or structures to significant wildfire risks, nor would it exacerbate wildfire conditions, and impacts related to wildfire hazards were determined to be less than significant (Section 20, p. 41).

Fueling stations and associated underground storage tanks are subject to extensive federal, State, and local regulations, including the California Fire Code, California Building Code, and review and approval by the Riverside Fire Department, which govern site design, separation distances, fire protection systems, emergency shut-off features, and fuel storage and dispensing infrastructure. Compliance with these requirements would minimize ignition risks and ensure safe operation. The City has reviewed the photographs provided with this comment; however, the images depict existing off-site eucalyptus trees and residential conditions and do not present substantial evidence of a project impact relating to the wildfire,

hazards, or fire-risk conclusions set forth in the IS/MND. As evaluated in Section 9, Hazards and Hazardous Materials, impacts associated with fire hazards, upset and accident conditions, and hazardous materials handling would be less than significant with compliance with applicable codes and regulations (Sections 9.a and 9.b, p. 23).

With respect to concerns regarding eucalyptus root systems and underground infrastructure, all underground utilities and storage systems would be designed and installed in accordance with applicable engineering standards, building codes, and utility requirements. Compliance with these standards would reduce the potential for damage to underground pipes or foundations, and impacts would be less than significant (Section 7, pp. 18–20).

Land use and zoning considerations, including the proposed General Plan Amendment and Rezone, were evaluated in the Land Use and Planning section of the IS/MND. The Project is subject to discretionary review by the City, and the IS/MND concludes that the proposed infill development would not result in significant environmental impacts related to land use compatibility (Sections 11.a and 11.b, pp. 27–28).

Based on the analysis contained in the IS/MND, the City concludes that potential fire hazard concerns associated with the Project have been adequately evaluated and addressed, and no revisions to the IS/MND are required in response to this comment.

Comment Letter A.5, Sharon Chase (March 4, 2026)

March 4, 2026

City of Riverside, Planning Department
3900 Main Street, 3rd Floor
Riverside, CA 92522
Attn:Yenifer Cid, Associate Planner

RE: PLANNING CASE PR:2021-000894 (GPA, RZ, CUP, DR, PCRN, VR), 6902, 6892, and 6836
Arlington Avenue, situated on the southeast corner of Arlington Avenue and Monroe Street

I oppose the change in land use designation and rezoning to permit this specific development of a gas station with convenience store and restaurant. I oppose issuance of a Conditional permit use for sale of off-site alcohol and the (PCN) Public Convenience and Necessity permit and variance. I don't see justification of the approval of these entitlements as there is no lack of currently operating gas stations and grocery stores near the planned site. There are Gas stations to the West and East at Arlington /Van Buren and Arlington/Adams. There are Grocery stores with food and alcohol sales, as well as many fast food businesses on the North and South side of Arlington/Van Buren Blvd intersection. Additionally there is an operating Liquor Store 276 feet across the street from the planning site. Liquor licenses currently granted in area are (6) which exceed the CA State Allowance of (4). if approved this would make (7). That is an over saturation of permits to sale alcohol.

A.5-1

Gas Stations are a leading source of neighborhood based pollution of the air, soil and water. Adding more toxic pollutants in area that has a cluster of gas stations should not be permitted.
I submit for consideration the fact that there is an existing Order for Clean up and Abatement, Order R8-2021-0006 which was issued by the State of California Regional Water Quality Board on 6/18/2021 against the parcel on the corner of Arlington/Adams, commonly known as 6160 and 6020 Arlington Ave, Riverside, CA, due to ground water contamination caused by a gas station operation. This Order is still active as the remediation efforts have been piecemeal and to date not satisfied. The scope of the contamination extends beyond the parcel site. The order indicates migration of contamination to Single Family Residences on San Vicente, and other surroundings parcels in the vicinity ,which include Adams Elementary School. See screen shot of 6160 and 6020 Arlington Ave. A full copy can be provided if requested, exceeds page limit allowance. Additionally, Geotracker.Waterboards.ca.gov website shows there are (6) LUST sites ("Leaking Underground Fuel Tank") in close proximity to the proposed development site under consideration. These sites have a leak or spill of hazardous substances, copies attached. These LUST sites are located at the following:

A.5-2

- (1) 6859 Arlington Ave, (276 feet across street from proposed planning site)
- (2) 8970 Arlington Ave, (1.4 miles away from proposed planning site (near Rutland),
- (3) 5995 Arlington Ave, Riverside, CA (0.6 miles away from proposed planning site (near Adams),
- (4) 4975 Van Buren Blvd, (1.2 miles away from proposed planning site (Near California Ave.).
- (5) 4865 Van Buren Blvd. (1.6 miles away from proposed planning site (near Colorado Ave)
- (6) 4865 Van Buren Blvd (1.6 miles away from proposed planning site (near Colorado Ave)

I am also concerned that the reports that were issued in 2021 to analyze the environmental impact are dated. The original demolition and build were scheduled for 2021/2022. The updated Appendixes indicate that since the only changes to the plan are orientation of the building and reduction of square footage to the convenience store that the assessments are still applicable to the updated site plan. However newer modeling has been adopted as noted below in red font. How can the Planning Commission rely on the determination of "**Less than significant effect on the environment with mitigation measures incorporated**" if the most current and best available information has not been provided. This data should be updated due to the significant amount of time passed and newer modeling available. I also submit newer studies published for your consideration.

A.5-3

Appendix A - AQ GHG Report- Threshold tables for Air Contaminants and Associated Public Health Concerns are dated 2017-2019. The various sited sources for the studies had source dates of 2016, 2019. Pg 11- Source: South Coast Air Quality Management District, Air Quality Management Plan, 2016; California Air Resources Board, Ambient Air Standards, May 6, 2016., Source: South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, April 2019. However The South Coast Air Quality Management District (SCAQMD) adopted the 2022 AQMP on December 2, 2022. This plan focuses on attaining the 2015 8-hour ozone standard, while the 2016 version focused on earlier, less stringent ozone and PM2.5 standards..

A.5-4

Appendix B - Greenhouse Gas Analysis- Source: California Air Resources Board, California Greenhouse Gas Emissions for 2000 to 2018, 2020.5 California Air Resources Board, California's 2017 Climate Change Scoping Plan, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed March 12, 2020. The City of Riverside has not adopted project specific GHG significance thresholds. For the purposes of this evaluation, the proposed Project's emissions compared to the SCAQMD interim screening level numeric bright-line threshold of 3,000 MTCO₂e per year. The Project's construction and operational emissions were calculated using the California Emissions Estimator Model ver 2016.3.2(CalEEMod). However there is a CalEEMod Version 2022.1, which includes updated emission factors (such as EMFAC2021) and improved data for calculating construction and operational emissions used? in updated report Version 2022.1.1.38: This is the current version, incorporating updated data from CARB and improved modeling for land use projects..

A.5-5

Appendix C - Focused Health Risk Assessment Technical Report Source: CalEEMod than 2016.3.2 for construction related Construction emissions . However there is an updated 2024 version CalEEMod 2020.4.0 and the more recent CalEEMod 2022.1.1.38, which are required by many districts for air quality assessments.

A.5-6

New scientific research is establishing that gas stations pollute the air to a much greater extent than previously understood, and that exposure to benzene is a significant cause of leukemia and other cancers, see citations below with hyperlinks.

Underestimated Emissions: Studies by Columbia University Mailman School of Public Health and ScienceDaily revealed that vent pipe emissions can be 10 times higher than previous estimates used to determine safety distances for nearby locations. Source Science daily /Columbia University's Mailman School of Public Health dated 10/4/2018.

Benzene Exposure Risk: PubMed Central (PMC) - NIH reports that benzene, a known carcinogen, exceeded safety levels within 7 to 8 meters of vent pipes. Source: Published in final edited form as: Sci Total Environ. 2018 Sep 24;650(Pt 2):2239–2250. doi:

Another study using PubMed Central (PMC) - NIH found that clusters of gas stations significantly increase cancer risks compared to individual stations. Source: J Environ Health Sci Eng. Source 2021 Jan 7;19(1):273–283. doi: [10.1007/s40201-020-00601-w](https://doi.org/10.1007/s40201-020-00601-w)

The impacted census tract would be better served by development of these parcels under the current land use designation and zoning. The Development of offices and or Single family residential homes would have “**No Negative Impact**”.

A.5-7

Respectfully submitted,

Sharon Chase
Resident- 8710 Driftwood Drive, Riverside
stchase1@gmail.com



POMA AUTOMATED FUELING INC. (FLITE CHIEF) (T0606500628) - (MAP) [SIGN UP FOR EMAIL ALERTS](#)

6859 ARLINGTON AVE
RIVERSIDE, CA 92504
RIVERSIDE COUNTY
LUST CLEANUP SITE (INFO)
OPEN - REMEDIATION AS OF 7/5/2010 - DEFINITION
PRINTABLE CASE SUMMARY / CSM REPORT

CUF Claim #: 15420

CUF Priority Assigned: B

CUF Amount Paid: \$1,495,000

CLEANUP OVERSIGHT AGENCIES
SANTA ANA RWQCB (REGION 8) (LEAD) - CASE #: 0833038277
CASE MANAGER: GONGDE CHEN
RIVERSIDE COUNTY - CASE #: 9915558
CASE MANAGER: SHARON BOLTINGHOUSE

Summary

Case Reviews

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Regulatory Activities

Environmental Data (ESI)

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Related Cases

LUST CUF Data

Regulatory Profile

CLEANUP STATUS - DEFINITIONS
OPEN - REMEDIATION AS OF 7/5/2010 - CLEANUP STATUS HISTORY

POTENTIAL CONTAMINANTS OF CONCERN
GASOLINE

FILE LOCATION
REGIONAL BOARD

DWR GROUNDWATER SUB-BASIN NAME
Upper Santa Ana Valley - Riverside-Arlington (8-002.03)

GROUNDWATER MONITORING FREQUENCY
OF WELLS MONITORED - QUARTERLY : 14

REASONS FOR QUARTERLY OR MONTHLY OR OTHER GROUNDWATER MONITORING:

- Assessment incomplete - Additional downgradient and crossgradient assessment is approved. A second release may have been discovered in the north.

POTENTIAL MEDIA OF CONCERN
AQUIFER USED FOR DRINKING WATER SUPPLY

DESIGNATED GROUNDWATER BENEFICIAL USE(S) - DEFINITIONS
MUN, AGR, IND, PROC

CALWATER WATERSHED NAME
Santa Ana River - Middle Santa Ana River - Arlington (801.26)

PRINTABLE CASE SUMMARY

Site History

Two 10,000-gallon gasoline and two 10,000-gallon diesel fuel underground storage tanks were removed from the site on August 10, 1999. An unauthorized release report for the release of gasoline and diesel fuel from the UST systems was issued on August 26, 1999. Groundwater in the excavation was observed to contain product and a grab groundwater sample was collected. The highest concentrations of petroleum hydrocarbons detected in samples collected at that time are shown on the table below:

Contaminant Soil Sample Number Soil Sample Concentration (mg/kg) Grab Groundwater Sample Concentration (g/l)

Total Petroleum Hydrocarbons as gasoline TB-W-12	17,700	274.000
Total Petroleum Hydrocarbons as diesel fuel D5	26,000	509.000
Benzene TB-W-12	43.9	7.560
Toluene TB-W-12	856	10.100
Ethylbenzene TB-W-12	297	4.230
Total Xylenes TB-W-12	1,670	12.900
Methyl tert-butyl ether TB-W-12	81.4	44.700

Five groundwater monitoring wells were installed on March 22, 2004 and initially sampled on March 26, 2004. Quarterly sampling occurred on February 7, 2005 and May 9, 2005. Groundwater was found at approximately 7 feet below ground surface. Groundwater monitoring confirmed the presence of significant contamination in groundwater. Higher concentrations of benzene, toluene, ethylbenzene and xylenes than those reported on the table above were detected in samples collected from wells MW3, MW4 and MW5.



STATE WATER RESOURCES CONTROL BOARD
GEOTRACKER



Tools

Reports

UST Case Closures

How to Use GeoTracker

ESI

Information

ARLINGTON SNACK AND AUTO (T0606500454) - (MAP)

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8970 ARLINGTON AVE
RIVERSIDE, CA 92503
RIVERSIDE COUNTY
LUST CLEANUP SITE (INFO)
OPEN - REMEDIATION AS OF 6/16/2010 - DEFINITION
PRINTABLE CASE SUMMARY / CSM REPORT

CUF Claim #: 17380 CUF Priority Assigned: B CUF Amount Paid: \$1,389,151

CLEANUP OVERSIGHT AGENCIES
SANTA ANA RWQCB (REGION 6) (LEAD) - CASE #: 0633027997
CASE MANAGER: CHRIS JARINQ
RIVERSIDE COUNTY - CASE #: 960121
CASE MANAGER: SHARON BOLTINGHOUSE

Summary Case Reviews Cleanup Action Report Regulatory Activities Environmental Data (ESI) Site Maps / Documents Community Involvement Related Cases LUST CUF Data

Regulatory Profile

CLEANUP STATUS - DEFINITIONS

OPEN - REMEDIATION AS OF 6/16/2010 - [CLEANUP STATUS HISTORY](#)

POTENTIAL CONTAMINANTS OF CONCERN

GASOLINE

FILE LOCATION

REGIONAL BOARD

DWR GROUNDWATER SUB-BASIN NAME

Upper Santa Ana Valley - Riverside-Arlington (8-002.03)

GROUNDWATER MONITORING FREQUENCY

OF WELLS MONITORED - QUARTERLY : 2, SEMI-ANNUALLY : 6

REASONS FOR QUARTERLY OR MONTHLY OR OTHER GROUNDWATER MONITORING:

- Assessment Incomplete - Additional on-site and off-site, downgradient wells proposed
- Well Being Sampled Within First Year of Being Installed - MW-5 and MW-6 First sampled 1st Qtr 2009

POTENTIAL MEDIA OF CONCERN

AQUIFER USED FOR DRINKING WATER SUPPLY

DESIGNATED GROUNDWATER BENEFICIAL USE(S) - DEFINITIONS

MUN, AGR, IND, PROC

CALWATER WATERSHED NAME

Santa Ana River - Middle Santa Ana River - Arlington (801.26)

PRINTABLE CASE SUMMARY

Site History

The site is an active AM/PM and ARCO retail fueling station, located at 8970 Arlington Avenue, in Riverside, California. Structures onsite consist of two parallel dispenser islands, an associated canopy and a mini-mart building. Along the western property line are three underground storage tanks (USTs) used as storage for unleaded gasoline. Results of previous site assessment and ongoing groundwater monitoring indicate that hydrocarbon affected soil and groundwater are present in the vicinity of the former UST cavity located on the southeastern portion of the site. The dissolved phase hydrocarbon plume extends offsite to the southeast. The site is underlain by clayey sand, silty sand, sand and weathered and decomposed granite to a depth of 30 feet, the maximum depth explored. The general groundwater flow direction beneath the site is to the southeast. In 2011, a full scale ozone injection system was installed at the site. The system has been operating since December 13, 2011.

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STATE WATER RESOURCES CONTROL BOARD
GEOTRACKER

SHELL STATION #5995 (FORMER) (T0606560462) - (MAP) SIGN UP FOR EMAIL ALERTS

5995 ARLINGTON AVENUE
RIVERSIDE, CA 92504
RIVERSIDE COUNTY
LUST CLEANUP SITE (INFO)
OPEN - VERIFICATION/MONITORING AS OF 6/1/2021 - DEFINITION
PRINTABLE CASE SUMMARY / FSM REPORT

CLEANUP OVERSIGHT AGENCIES
SANTA ANA RWOCB (REGION 8) (LEAD) - CASE #: 0833040627
CASE MANAGER: GONGSDE, CHEN
RIVERSIDE COUNTY - CASE #: unknown
CASE MANAGER: Riverside County LOP

CUF Claim #: 20867 CUF Priority Assigned: D CUF Amount Paid: \$785,530

Summary Case Reviews Cleanup Action Report Regulatory Activities Environmental Data (ESI) Site Maps / Documents Community Involvement Related Cases LUST CUF Data

Regulatory Profile

CLEANUP STATUS - DEFINITIONS
OPEN - VERIFICATION MONITORING AS OF 6/1/2021 - CLEANUP STATUS HISTORY
POTENTIAL CONTAMINANTS OF CONCERN
GASOLINE
FILE LOCATION
REGIONAL BOARD
DWR GROUNDWATER SUB-BASIN NAME
Upper Santa Ana Valley - Riverside-Arlington (8-002.03)
GROUNDWATER MONITORING FREQUENCY
OF WELLS MONITORED - SEMI-ANNUALLY : 8

POTENTIAL MEDIA OF CONCERN
AQUIFER USED FOR DRINKING WATER SUPPLY
DESIGNATED GROUNDWATER BENEFICIAL USE(S) - DEFINITIONS
MUN, AGR, IND, PROCC - Note: Also incl parts of 801.26.
CALWATER WATERSHED NAME
Santa Ana River - Middle Santa Ana River - Arlington (801.26)

PRINTABLE CASE SUMMARY

Site History

Environmental reports pertaining to subsurface investigations/testing and site remediation performed in conjunction with this project, as well as the Regional Board case file, should be reviewed in their entirety to obtain further details regarding this cleanup effort. Regional Board staff are not responsible for the accuracy of any professional interpretations provided in reports submitted by consultants working for the responsible party.



STATE WATER RESOURCES CONTROL BOARD
GEOTRACKER

G AND K PETRO (T0606500386) - (MAP) [SIGN UP FOR EMAIL ALERTS](#)

4975 VAN BUREN BLVD
RIVERSIDE, CA 92503
RIVERSIDE COUNTY
LUST CLEANUP SITE (INFO)
OPEN - REMEDIATION AS OF 8/21/2025 - [DEFINITION](#)
[PRINTABLE CASE SUMMARY / CSM REPORT](#)

CLEANUP OVERSIGHT AGENCIES
SANTA ANA RWOCB (REGION 8) (LEAD) - CASE #: 08302504T
CASE MANAGER: CHRIS MARINO
RIVERSIDE COUNTY
CASE MANAGER: SHARON BOLTINGHOUSE

CUF Claim #: 9088 CUF Priority Assigned: B CUF Amount Paid: \$1,109,298

Summary Case Reviews Cleanup Action Report Regulatory Activities Environmental Data (ESI) Site Maps / Documents Community Involvement Related Cases LUST CUF Data

Regulatory Profile

CLEANUP STATUS - [DEFINITIONS](#)
OPEN - REMEDIATION AS OF 8/21/2025 - [CLEANUP STATUS HISTORY](#)
POTENTIAL CONTAMINANTS OF CONCERN
GASOLINE
FILE LOCATION
DWR GROUNDWATER SUB-BASIN NAME
Upper Santa Ana Valley - Riverside-Arlington (8-002.03)
GROUNDWATER MONITORING FREQUENCY
OF WELLS MONITORED - SEMI-ANNUALLY : 11

PRINTABLE CASE SUMMARY

POTENTIAL MEDIA OF CONCERN
AQUIFER USED FOR DRINKING WATER SUPPLY
DESIGNATED GROUNDWATER BENEFICIAL USE(S) - [DEFINITIONS](#)
MUN, AGR, IND, PROC
CALWATER WATERSHED NAME
Santa Ana River - Middle Santa Ana River - Arlington (801.26)

Site History

Beginning in 1993, G&K Petroleum is under the direction of this agency to investigate the extent and remediate the gasoline-affected soil and groundwater that underlies their former site located at 4975 Van Buren Blvd., Riverside. G&K Petroleum has conducted subsurface investigations that indicate that the soil and groundwater underlying the former G&K Petroleum gasoline service facility were affected by past discharges of gasoline. These efforts have included installation soil borings and groundwater monitoring wells. These investigations indicate that the impacted groundwater extends to the west of former G&K Petroleum facility across Van Buren Blvd towards the southern portion of the subject Wal-Mart facility parking lot. Groundwater has been found to flow in a general westerly direction towards the southern portion of the Wal-Mart property.

Subsequent investigations indicate the the extent of the MTBE plume extends beyond the Walmart priking lot to the northwest into the residential neighborhood.



SIGN UP FOR EMAIL ALERTS

NCS STOP & GO #0132 (BEACON/NCS 13349) (T0606500252) - (MAP)

4865 VAN BUREN BLVD
RIVERSIDE, CA 92503
RIVERSIDE COUNTY
JUST CLEANUP SITE (INFO)

OPEN - REMEDIATION AS OF 7/1/2020 - DEFINITION

PRINTABLE CASE SUMMARY / CSM REPORT

CLEANUP OVERSIGHT AGENCIES
SANTA ANA RWQCB (REGION 6) (LEAD) - CASE # 0833019647
CASE MANAGER: CHRIS JARINO
RIVERSIDE COUNTY - CASE # 89209
CASE MANAGER: Riverside County LOP

Summary Case Reviews Cleanup Action Report Regulatory Activities Environmental Data (ESI) Site Maps / Documents Community Involvement Related Cases

Regulatory Profile

PRINTABLE CASE SUMMARY

CLEANUP STATUS - DEFINITIONS
OPEN - REMEDIATION AS OF 7/1/2020 - CLEANUP STATUS HISTORY

POTENTIAL CONTAMINANTS OF CONCERN

GASOLINE

FILE LOCATION

REGIONAL BOARD

DWR GROUNDWATER SUB-BASIN NAME

Upper Santa Ana Valley - Riverside-Arlington (8-002.03)

GROUNDWATER MONITORING FREQUENCY

OF WELLS MONITORED - SEMI-ANNUALLY : 6

POTENTIAL MEDIA OF CONCERN

AQUIFER USED FOR DRINKING WATER SUPPLY

DESIGNATED GROUNDWATER BENEFICIAL USE(S) - DEFINITIONS

MUN, AGR, IND, PROC

CALWATER WATERSHED NAME

Santa Ana River - Middle Santa Ana River - Arlington (801.26)

Site History

The Property consists of approximately 1.78 acres at the southeastern corner of the intersection with Colorado Avenue and Van Buren Boulevard in the City of Riverside, California. A Thrifty Oil station is located at the northwest corner of the intersection of Van Buren and Wells Avenue. A former Shell Oil station was located at the southwestern corner of subject intersection. An Arco-branded service station is located at the northeastern corner of the intersection.

The subject site is impacted from past discharges of gasoline from former underground storage tanks (USTs) and a dispenser system associated with the operation of a gas station at the site. The site was operated as an independent Unocal-branded service station until around 1982. In 1985, National Convenience Stores (NCS), Inc. purchased the property and removed the USTs at the site. Beginning in 1985 to 1994, NCS conducted site investigations and groundwater monitoring activities to define the extent of the affected groundwater and to assess the effectiveness of cleanup activities conducted at the site. These activities included the installation of six on-site groundwater monitoring wells and seven off-site groundwater monitoring wells. The results of these investigations indicated that past discharges of petroleum hydrocarbons from the former UST system at the subject property had impacted the underlying soil and groundwater and that discharges of petroleum hydrocarbons have occurred on the adjacent gasoline service stations at the subject intersection. In September 1987, approximately 750 cubic yards of petroleum affected soil was excavated, treated on-site, and disposed on site.

In 1991, NCS filed for bankruptcy. In 1995, Diamond Shamrock, purchased the NCS Go-Stop N Go-Stop stations and merged with Ultramar, Inc. in 1996. In 1998, approximately 420 lbs of oxygen releasing compound was injected into the subsurface to address petroleum hydrocarbons in the groundwater. In 2001, Valero Energy Corporation acquired Ultramar Diamond Shamrock. Valero, as NCS's successor, has assumed responsibility for conducting testing, monitoring, and cleanup at the site. In 2004, Ultramar sold the property to Van Buren Property Investment, Inc, the current property owner, and National Convenience Stores, Inc. indemnified Van Buren Property Investment of liabilities from existing pollutants from past operations of the site. In a July 14, 2004 letter, Regional Board staff issued a Letter to Van Buren Property Investment stating Regional Board policy regarding the potential responsibility of prospective purchasers of a contaminated property. A copy of this letter is attached herein.

Between 2004 and 2008, all the on-site groundwater monitoring wells were abandoned because they were either damaged, dry or needed to be abandoned to facilitate proposed development of the site. In April 2013, six on-site groundwater monitoring wells were installed at the site. The results indicated elevated concentrations of petroleum hydrocarbons remain in the groundwater underlying at the site. A soil vapor survey was conducted in October 2014.

In October 2014, up to 0.89 feet of free floating product was detected in two of the on-site wells. Valero's consultant asserted that the likely source of the free product was the former Shell Station located across Van Buren Blvd and requested site closure asserting that the site meets the criteria for site closure under the State Water Resources Control Board UST Low Threat Closure Policy. Board staff believes that the site does not meet the Low Threat Closure Criteria at this time and has not concurred with Valero's closure request.

Responses to Comment Letter A.5, Sharon Chase (March 4, 2026)

A.5-1 The comment expresses generalized opposition to the project but does not state a specific concern regarding the adequacy or accuracy of the environmental analysis provided in the Initial Study/Mitigated Negative Declaration (IS/MND), or "substantial evidence" that the project would result in a significant environmental impact ((California Environmental Quality Act (CEQA) Guidelines Section 15064(f)). The prevalence of gas stations, grocery stores, and liquor stores in the area of the Property is not a CEQA environmental issue. Regardless, as discussed in the IS/MND, two off-sale licenses are allowed in this census tract per the allotment of the California Department of Beverage Control (ABC), and six off-sale licenses already exist in this census tract. Because the number of existing licenses exceeds the ABC allocation, approval of an additional off-sale license would require a finding of Public Convenience or Necessity (PCN) by the City and approval by ABC. One additional off-sale license will not result in an "over saturation" of permits to sell alcohol.

Because this comment does not identify a specific CEQA defect, allege a significant environmental impact, or question an analysis within the environmental document, no further response is required. The comment is noted for the record and will be forwarded to the applicable review body for their consideration prior to any final action on the Project.

A.5-2 The commenter raises concerns regarding existing groundwater contamination and leaking underground storage tank (LUST) sites in the vicinity of the Project, including reference to an active Cleanup and Abatement Order affecting off-site properties, and provided GeoTracker images depicting these off-site sites. Regarding the list of LUST sites, the commenter is referred to Response A.2-4 above. As evaluated in the IS/MND, the Project Site is not included on any hazardous materials site lists compiled pursuant to Government Code Section 65962.5, including databases identifying sites subject to cleanup or regulatory enforcement, and no known soil or groundwater contamination has been identified on the Project Site (Section 9.d, p. 24).

The Cleanup and Abatement Order cited in the comment pertains to separate, off-site parcels and is not associated with the proposed Project Site. The IS/MND determined that the proposed Project would not disturb contaminated soil or groundwater, nor would it exacerbate or interfere with ongoing remediation efforts at off-site locations (Section 9, pp. 23–24). CEQA does not require a project to remediate existing contamination that it did not cause, nor does the presence of off-site contamination, by itself, constitute a significant impact of the proposed Project.

Fueling stations and underground storage tanks are subject to extensive federal, State, and local regulatory requirements, including design, installation, monitoring, and leak detection standards enforced by applicable agencies. Compliance with these regulations would minimize the potential for releases of hazardous substances. As analyzed in IS/MND Section 9, Hazards and Hazardous Materials, the routine use, storage, and transport of hazardous

materials associated with the Project would not create a significant hazard to the public or the environment (Sections 9.a and 9.b, p. 23).

With respect to groundwater quality, the Project would be required to comply with applicable National Pollutant Discharge Elimination System (NPDES) requirements and implement an approved Project-Specific Water Quality Management Plan (WQMP). The IS/MND concludes that the Project would not violate water quality standards, degrade groundwater quality, or contribute to existing contamination conditions, and impacts related to groundwater and water quality would be less than significant (Sections 10.a and 10.b, p. 25; Section 10.e, p. 27).

Cumulative impacts related to hazardous materials and groundwater conditions were evaluated in the IS/MND. The analysis determined that the proposed Project would not result in a cumulatively considerable contribution to hazardous materials or groundwater impacts when considered in combination with past, present, and reasonably foreseeable future projects (Section 21.b, p. 42). Accordingly, no significant cumulative impacts were identified.

Based on the analysis contained in the IS/MND, no revisions to the document are required in response to this comment.

A.5-3 Since circulation of the IS/MND, the air quality and greenhouse gas analyses have been comprehensively updated to reflect the most current modeling tools, methodologies, and regulatory guidance available at the time of recirculation. Additionally, as noted in Response A.1-2, a site-specific Health Risk Assessment (HRA) was prepared for the Proposed Project and impacts were determined to be less than significant with mitigation.

Specifically the technical studies supporting the Project have been updated using the latest available version of the California Emissions Estimator Model (CalEEMod) and current emissions factors, thresholds, and analytical approaches. The updated modeling reflects revised construction schedules, updated operational assumptions, and the current site plan, including changes to building orientation and reductions in convenience store square footage. The analyses no longer rely on outdated assumptions associated with the original 2021 demolition and construction timeline and instead evaluate the Project under current baseline conditions and applicable regulatory standards. These updated studies have been fully incorporated into the Recirculated IS/MND and replace or supersede earlier versions prepared for prior project iterations.

With respect to the determination of “less than significant impact with mitigation incorporated,” CEQA does not require that conclusions be based on the originally circulated studies if more recent, more accurate information is available. Rather, CEQA expressly allows and encourages lead agencies to update and recirculate environmental analysis when new information or refined methodologies are used, which has occurred in this case. The Recirculated IS/MND reflects the best available information and analytical tools and provides the public with an opportunity to review and comment on those updates.

The Lead Agency has reviewed the newer studies submitted by the commenter as part of the administrative record. However, CEQA does not require adoption of every newly published study if the environmental analysis already relies on current, accepted methodologies and substantial evidence demonstrates that impacts are adequately characterized and mitigated. In this case, the updated modeling and methodologies incorporated into the Recirculated IS/MND provide a sound and defensible basis for the environmental conclusions.

Accordingly, the Recirculated IS/MND appropriately relies on updated technical analyses using the latest modeling tools and methods, and that the conclusions regarding environmental impacts, including impacts that are less than significant with mitigation incorporated, are supported by substantial evidence in the record.

- A.5-4** Refer to Response A.5-3, above. As noted above, the Air Quality and Greenhouse Gas analyses have been updated to reflect current regulatory standards, modeling tools, and guidance, and these updated analyses have been incorporated into the Recirculated IS/MND. The reports have been updated to use the latest version of CalEEMod and evaluate the latest South Coast AQMD Air Quality Management Plan.
- A.5-5** Refer to Response A.5-3, above. As noted above, the Greenhouse Gas analysis has been updated to reflect current regulatory standards, modeling tools, and Greenhouse Gas reduction plans, including the [California Air Resources Board](#) (CARB) 2022 Scoping Plan.
- A.5-6** Refer to Response A.1-2, above. As noted in Response A.1-2, a site-specific HRA was prepared for the Proposed Project and impacts were determined to be less than significant with mitigation. The HRA and associated modeling data are included in the Recirculated IS/MND.
- A.5-7** This comment, which concludes the letter and expresses general opposition to the Project, is noted for the record and will be made available to the decision-makers for their review and consideration.