CITY OF MORENO VALLEY

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE MORENO VALLEY FARM BUREAU 139 RESIDENTIAL PROJECT

Tentative Tract Map 38955 for Condominium Purposes (PEN24-0058)
Plot Plan (PEN24-0059)
Variance (PEN24-0144)

September 2025

Lead Agency
CITY OF MORENO VALLEY
14177 Frederick Street
Moreno Valley, CA 92553

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TABLE OF CONTENTS

FIGURES

TABLES

APPENDICES

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INITIAL STUDY (IS) FOR FARM BUREAU 139 RESIDENTIAL PROJECT

BACKGROUND INFORMATION AND PROJECT DESCRIPTION

1. **Project Case Number(s):**
   PEN24-0058 – Tentative Tract Map 38955 for Condominium Purposes
   PEN24-0059 – Plot Plan
   PEN24-0144 – Variance

2. **Project Title:** Farm Bureau 139 Residential Project

3. **Public Comment Period**: **October 3, 2025 through November 3, 2025**

4. **Lead Agency**: City of Moreno Valley
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   951.413.3206
   Planningnotices@moval.org

5. **Documents Posted at**: https://moval.gov/cdd/documents/about-projects.html

6. **Prepared By:** Debra Leight, Environmental Practice Lead
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   dleight@mnsengineers.com

7. **Project Sponsor:**

Applicant/Developer	**Property Owner**
Bryan Bergeron, Vice President, Land Development Foremost Pacific Group 27271 Las Ramblas, Suite 100 Mission Viejo, CA 92691 fpginfo@foremostpacific.com	Same as project sponsor.

8. **Project Location**: North of Box Springs Road, east of Morton Road, and west of Lewisia Avenue, with existing residential uses bordering the site to the north and west (APNs 256-200-002, 256-200-003, and 256-200-004). Refer to Exhibits 1 (Regional Vicinity) and 2 (Project Location) for project location information.

9. **General Plan Designation**: Residential/Office (R/O)
According to the City's General Plan, the primary purpose of areas designated as Residential/Office is for the establishment of areas for office-based working establishments or residential developments of up to 15 dwelling units per acre. The zoning regulations shall identify the particular uses and types of residential development allowed on each parcel of land. Overall development intensity shall not exceed a Floor Area Ratio of 1.0.

10. **Specific Plan Name and Designation**:
There is no Specific Plan within the project area.

11. **Existing Zoning: Multi-Family Residential (R15**)
According to the City's General Plan, the primary purpose of areas designated R15 Residential is to provide a range of multi-family housing types for those not desiring dwellings on individual lots that include amenities such as common open space and recreational facilities. The maximum allowable density shall be 15.0 dwelling units per acre. The density of the proposed development is 15 du/ac.

12. **Surrounding Land Uses and Setting:**

	Land Use	General Plan	Zoning
Project Site	Residential/Office (R/O)	Residential/Office (R/O)	Multi-Family Residential (R15)
North	Residential: Max. 5 du/ac (R5)	Residential: Max. 5 du/ac (R5)	Suburban Residential (R5)
South	Commercial (C)	Commercial (C)	Commercial (CC)
East	Residential (R5) and Office (O)	Residential (R5) and Office (O)	Office (O)
West	Residential (20)	Residential (20)	Multi-Family Residential (R20)

13. **Description of the Site and Project:**

Environmental Setting

The project site consists of approximately 9.33 gross acres located north of Box Springs Road, east of Morton Road, and west of Lewisia Avenue, with existing residential uses bordering the site to the north and west. The project site consists of three parcels, identified as APNs 256-200-002, 256-200-003, and 256-200-004. Approximately 1.5 acres of the project site along the frontage with Box Springs Road is developed with a small, linear strip mall of separate offices and storefronts. There are two paved entrances to the parking lot in front of the strip mall and a graded parking area behind the strip mall. The remainder of the site is vacant and is subject to routine weed abatement activities (i.e., disking, tilling), resulting in heavily disturbed surface soils. The site topography is relatively flat terrain with elevations ranging from approximately 1,533 to 1,564 feet above mean sea level.

The project site is surrounded to the east, west and north by single and multi-family residential development. A park with children's play structures is located to the

northeast, along with turf and other maintained landscaping associated with the residential communities that surround the site.

Project Description

The City of Moreno Valley is processing an application for a Tentative Tract Map (TTM 38955), for the development of a 139-unit multi-family residential condominium project within three parcels totaling approximately 9.33 gross acres, including all associated access, circulation, infrastructure, utility hardscape/landscape improvements. Proposed open space and recreational amenities within the site would include a clubhouse, pool, and gym, 1.04-acre (4,532 square feet) common open space area, and 21,165 square feet of private outdoor space consisting of decks or patios attached to each unit. The proposed project also includes demolition of the existing structures on-site.

The project site has a General Plan land use designation of Residential/Office (R/O) Use and is zoned Multi-Family, High Density Residential (R-15), which is intended as an area for development of attached residential dwelling units with a maximum allowable density of 15 dwelling units per net acre (du/ac). The density of the proposed development is 15 du/ac. A variance from Moreno Valley Municipal Code Section 9.03.040(F)(1) is also being sought to allow a 50-foot rear setback of the project (zoned R-15) to be measured from any residential structure (exceeding one story) on the project site to the property line of any parcel containing a residential structure in the adjacent residential subdivision since there is an intervening easement that precludes the development of a single-family structure within said easement.

In 2006, the City conducted a comprehensive update of its 1996 General Plan, resulting in the City of Moreno Valley General Plan (2006 General Plan), which was adopted on July 11, 2006. This document can be found on the City's website at https://moval.gov/city_hall/general-plan.html.

The City's current (2006) General Plan and 2006 General Plan EIR were relied upon or consulted in the preparation of this IS/MND, as applicable, and are hereby incorporated by reference:

- *City of Moreno Valley General Plan*, City of Moreno Valley, adopted on July 11, 2006.
- *Final Environmental Impact Report for the City of Moreno Valley General Plan* (SCH No. 200091075), certified July 11, 2006

On June 15, 2021, the City of Moreno Valley City Council approved and adopted the City of Moreno Valley General Plan 2040 Update (referred to herein as the "2040 General Plan"), a Change of Zone and Municipal Code Update, and a Climate Action Plan (CAP), and certified an EIR (State Clearinghouse [SCH] No. 2020039022), as having been prepared in compliance with the California Environmental Quality Act (CEQA) in connection with the approvals. A lawsuit entitled Sierra Club v. The City of Moreno Valley, Riverside Superior Court Case

No. CVRI2103300, challenged the validity of the 2040 General Plan, the CAP, and the EIR. In June 2024, the City Council set aside the 2021 approvals and certification, based on a May 2024 ruling and judgment of the court. The City is in the process of readopting the 2040 General Plan, Municipal Code, Zoning, and CAP consistent with the court's decision and issued a Notice of Preparation of a Revised Environmental Impact Report for MoVal 2040: The Moreno Valley Comprehensive General Plan Update, Municipal Code and Zoning (including Zoning Atlas) Amendments, and CAP on July 30, 2024. In response to a Peremptory Writ of Mandate (Case No. CVRI2103300) issued by Hon. Judge Firetag of Riverside County Superior Court on or about May 6, 2024, the Moreno Valley City Council rescinded its prior approval of the MoVal 2040 General Plan Update, Climate Action Plan and Final Program Environmental Impact Report. The City Council also subsequently repealed in response to the Peremptory Wirt of Mandate (Case No. CVRI2103300) its prior approval of the 2040 MoVal General Plan Zoning ordinance. As a result, the City of Moreno Valley's 2006 General Plan and associated zoning were reinstated as the General Plan and zoning policies and regulations applicable to the Project.

The Zoning Code is located under Title 9, *Planning and Zoning,* of the Moreno Valley Municipal Code. The City's Zoning Code can be found on the Moreno Valley Municipal Code hosting website at: https://library.qcode.us/lib/moreno_valley_ca/pub/municipal_code. Refer to Exhibit 3 (Land Use) for land use and zoning information. Additional project details including the grading plan, site plan and water quality management plan (WQMP) best management practices (BMP) is included in Exhibits 4 (Conceptual Grading Plan), 5 (Site Plan), and 6 (WQMP BMP Map).

14. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The City has established a Tribal Historic Preservation Office (THPO) contact list pursuant to Public Resources Code Section 21080.3. The City has distributed letters to applicable THPOs on the City's contact list, providing initial information about the project and inviting consultation. Tribal consultation was completed in 2024/2025 and the City has incorporated the requested mitigation measures and cultural resources report updates. See Section 4.18, *Tribal Cultural Resources*, of this IS/MND for additional information.

The City of Moreno Valley initiated AB52 consultation on September 11, 2024, for

a 30-day period. The City sent notices regarding the Project to the following California Native American tribes that may have knowledge regarding tribal cultural resources in the Project vicinity:

- Agua Caliente Band of Cahuilla Indians
- Desert Cahuilla Indians
- Morongo Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians)
- Soboba Band of Luiseño Indians

The Pechanga Band of Indians, Morongo Band of Mission Indians, Soboba Band of Luiseño Indians, and Rincon Band of Luiseño Indians, requested consultation regarding the proposed Project, under Assembly Bill (AB52). The City received correspondence from the Yuhaaviatam of San Manuel Nation declining AB52 consultation, stating that the proposed project was located outside of Serrano ancestral territory and as such, would not be requesting to receive consultation party status or participating in the scoping, development or review of documents created pursuant to legal and regulatory mandates.

The consulting tribes support and request that efforts to preserve and protect sensitive Tribal Cultural Resources be made as early as possible in the development process. They also requested to participate in the environmental review process.

The consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented tribal archaeological and cultural resources during construction. These mitigation measures are incorporated in this Initial Study. The Pechanga Band of Indians, Morongo Band of Mission Indians, Soboba Band of Luiseño Indians, and Rincon Band of Luiseño Indians, requested monitoring for all ground disturbing activities.

City staff completed formal tribal consultation under AB52 on September 10, 2025. Any further input from the tribes will be through the 30-day public review period for CEQA.

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

a. Eastern Municipal Water District (EMWD) – Water and wastewater connection permits
b. California Department of Fish and Wildlife 1602 Streambed Alteration Agreement
c. Santa Ana Regional Water Quality Control Board – Section 401/Porter Cologne Act Permit, National Pollutant Discharge Elimination System (NPDES) Approval

d. State Water Resources Control Board – Stormwater Pollution Prevention Plan (SWPPP) Approval

16. **Other Technical Studies Referenced in this Initial Study (Provided as Appendices):**

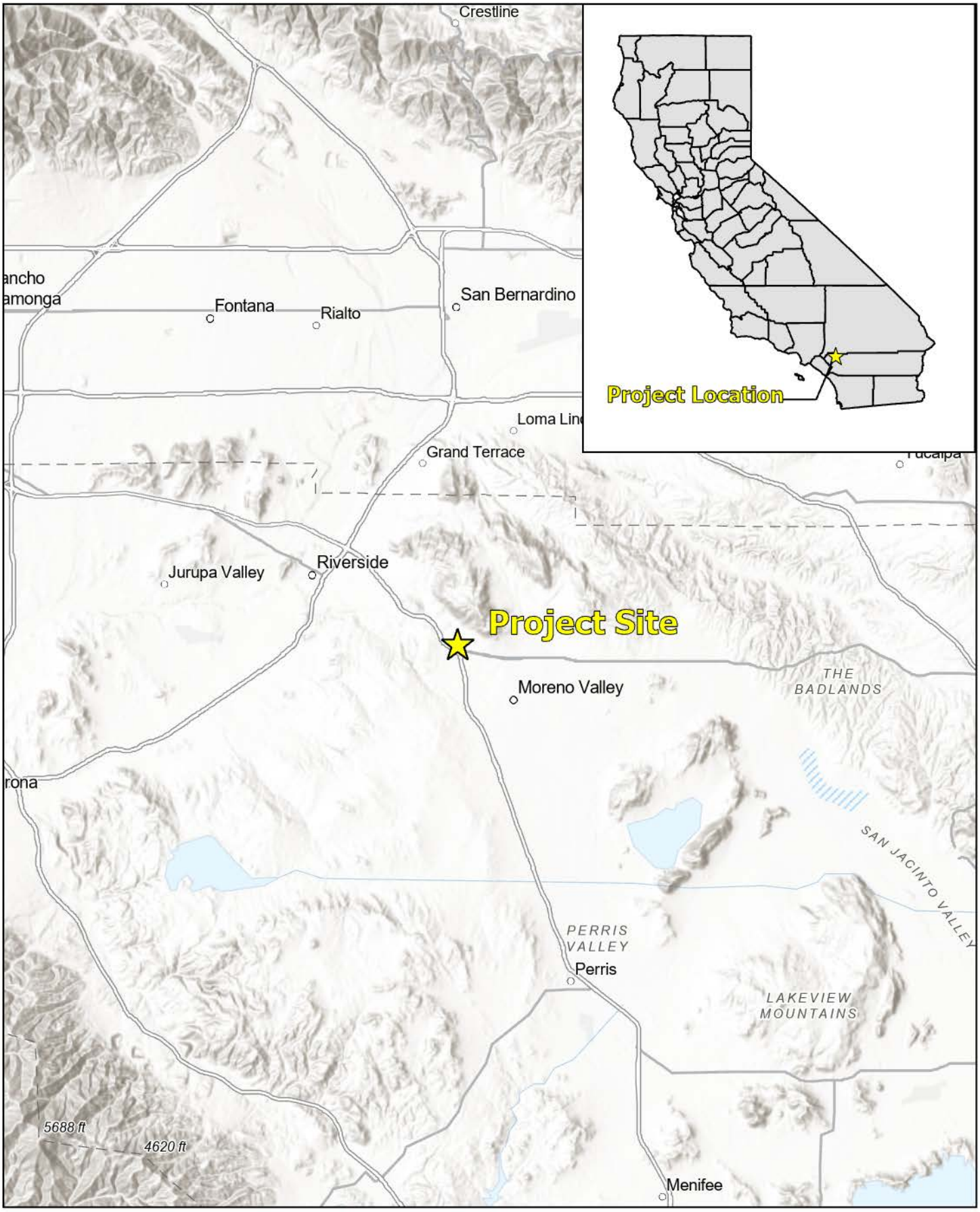
1. Air Quality, Greenhouse Gas, Health Risk Assessment and Energy Impact Analysis Report
2A. Biological Resources Assessment and MSHCP Consistency Analysis
2B. Burrowing Owl Focused Survey Report
2C. Crotch's Bumblebee Focused Survey Report
3. Phase I Cultural Assessment
4A. Soils Report
4B. Web Soils Survey
5. Phase I Environmental Site Assessment
6A. Hydrology Report
6B. Water Quality Management Plan
7. Noise Impact Analysis Report
8A. Trip Generation Assessment
8B. Vehicle Miles Traveled Assessment
9. Fire Protection Plan

17. **Acronyms:**

AB52 -	Assembly Bill 52
ADA -	American with Disabilities Act
ALUC -	Airport Land Use Commission
ALUCP -	Airport Land Use Compatibility Plan
AQMP -	Air Quality Management Plan
BUOW -	Burrowing Owl
BMP -	Best Management Practices
CEQA -	California Environmental Quality Act
CIWMD -	California Integrated Waste Management District
CMP -	Congestion Management Plan
DTSC -	Department of Toxic Substance Control
DWR -	Department of Water Resources
EIR -	Environmental Impact Report
EMWD -	Eastern Municipal Water District
EOP -	Emergency Operations Plan
FEMA -	Federal Emergency Management Agency
FMMP -	Farmland Mapping and Monitoring Program
GIS -	Geographic Information System
GHG -	Greenhouse Gas
GP -	General Plan
HCM	Highway Capacity Manual
HOA -	Home Owners' Association
IS -	Initial Study

LHMP -	Local Hazard Mitigation Plan
LOS -	Level of Service
LST -	Localized Significance Threshold
MARB -	March Air Reserve Base
MARB/IPA-	March Air Reserve Base/Inland Port Airport
MSHCP -	Multiple Species Habitat Conservation Plan
MVFP -	Moreno Valley Fire Department
MVPD -	Moreno Valley Police Department
MVUSD -	Moreno Valley Unified School District
MWD -	Metropolitan Water District
NCCP -	Natural Communities Conservation Plan
NPDES -	National Pollutant Discharge Elimination System
OEM -	Office of Emergency Services
OPR -	Office of Planning & Research, State
PEIR -	Program Environmental Impact Report
PW -	Public Works
RCEH -	Riverside County Environmental Health
RCFD -	Riverside County Fire Department
RCFCWCD -	Riverside County Flood Control & Water Conservation District
RCP -	Regional Comprehensive Plan
RCTC -	Riverside County Transportation Commission
RCWMD -	Riverside County Waste Management District
RFD -	Riverside Fire Department
RTA -	Riverside Transit Agency
RTIP -	Regional Transportation Improvement Plan
RTP -	Regional Transportation Plan
SAWPA -	Santa Ana Watershed Project Authority
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SCE -	Southern California Edison
SCH -	State Clearinghouse
SKRHCP -	Stephens' Kangaroo Rat Habitat Conservation Plan
SWPPP -	Storm Water Pollution Prevention Plan
SWRCB -	State Water Resources Control Board
USFWS -	United States Fish and Wildlife
USGS -	United States Geologic Survey
VMT -	Vehicle Miles Traveled
VVUSD -	Valley Verde Unified School District
WQMP -	Water Quality Management Plan
WRCOG -	Western Riverside Council of Government

Figure 1: Regional Vicinity



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MORENO VALLEY FARM BUREAU PROJECT
Initial Study/Mitigated Negative Declaration

REGIONAL VICINITY

Exhibit 1

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Figure 2: Project Location

MORENO VALLEY FARM BUREAU PROJECT
Initial Study/Mitigated Negative Declaration

PROJECT LOCATION

Exhibit 2

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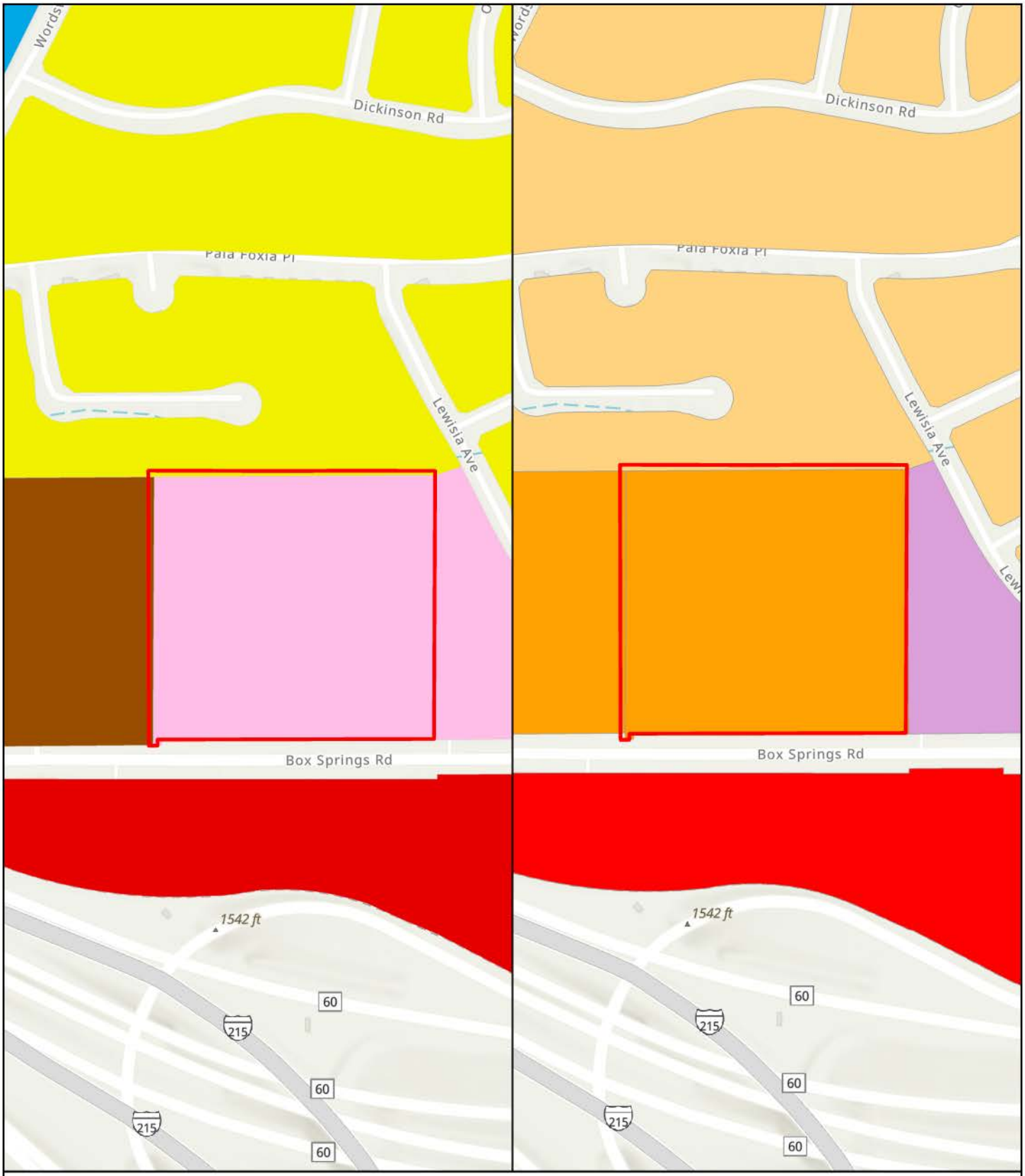
Figure 3: Land Use



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MORENO VALLEY FARM BUREAU PROJECT
Initial Study/Mitigated Negative Declaration

LAND USE

Exhibit 3

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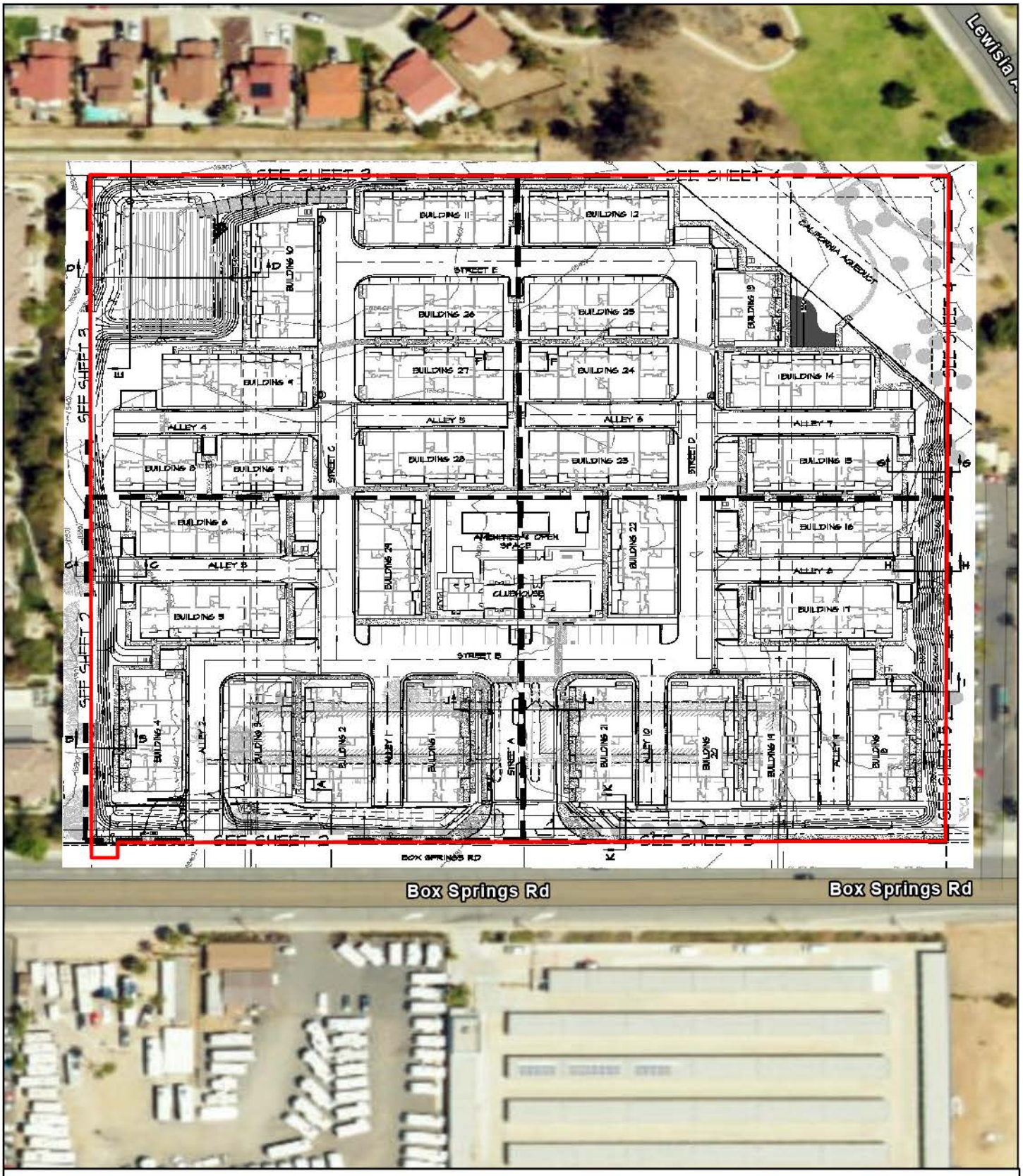
Figure 4: Conceptual Grading Plan



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MORENO VALLEY FARM BUREAU PROJECT
Initial Study/Mitigated Negative Declaration

CONCEPTUAL GRADING PLAN

Exhibit 4

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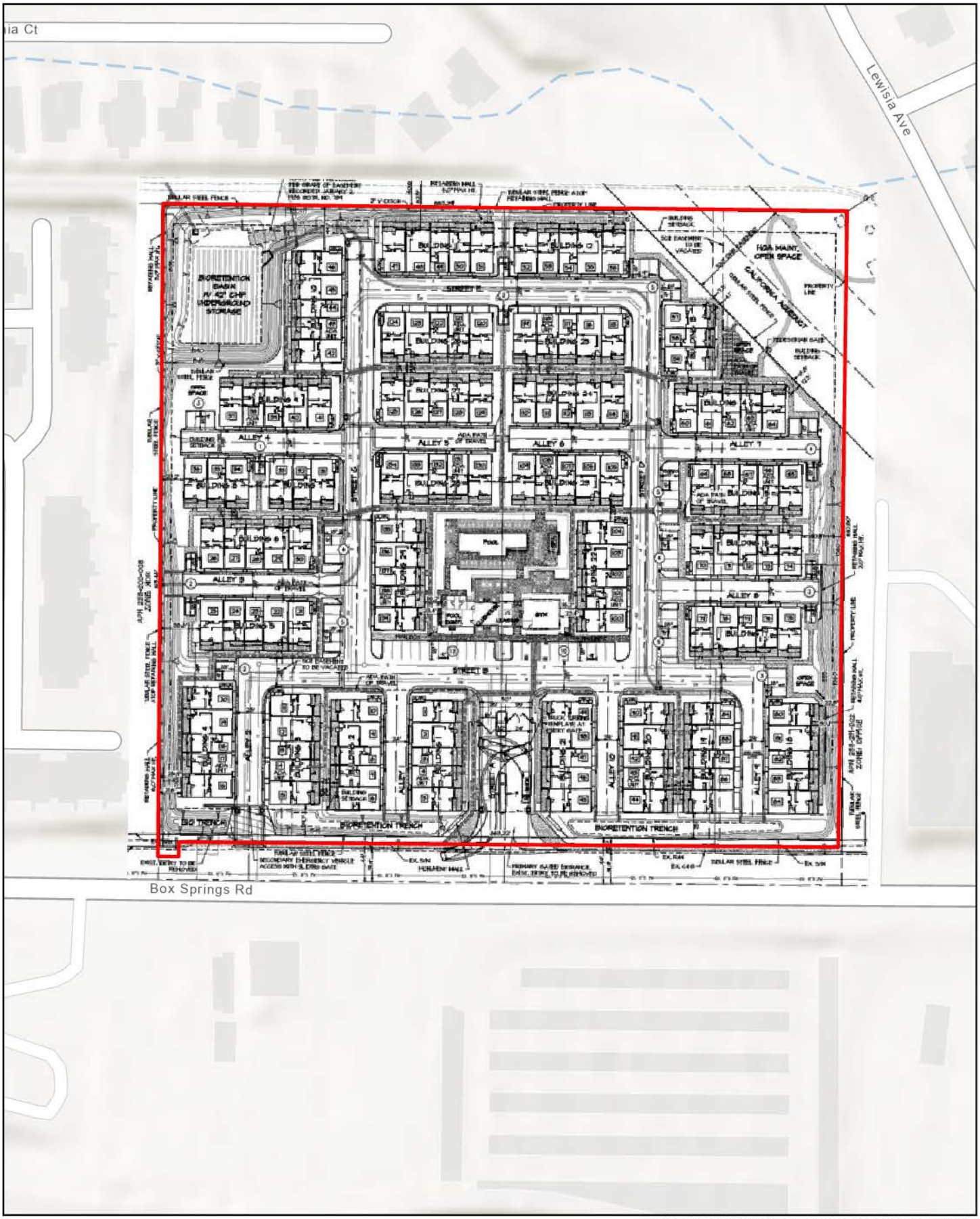
Figure 5: Site Plan



MORENO VALLEY FARM BUREAU PROJECT
Initial Study/Mitigated Negative Declaration

SITE PLAN
Exhibit 5

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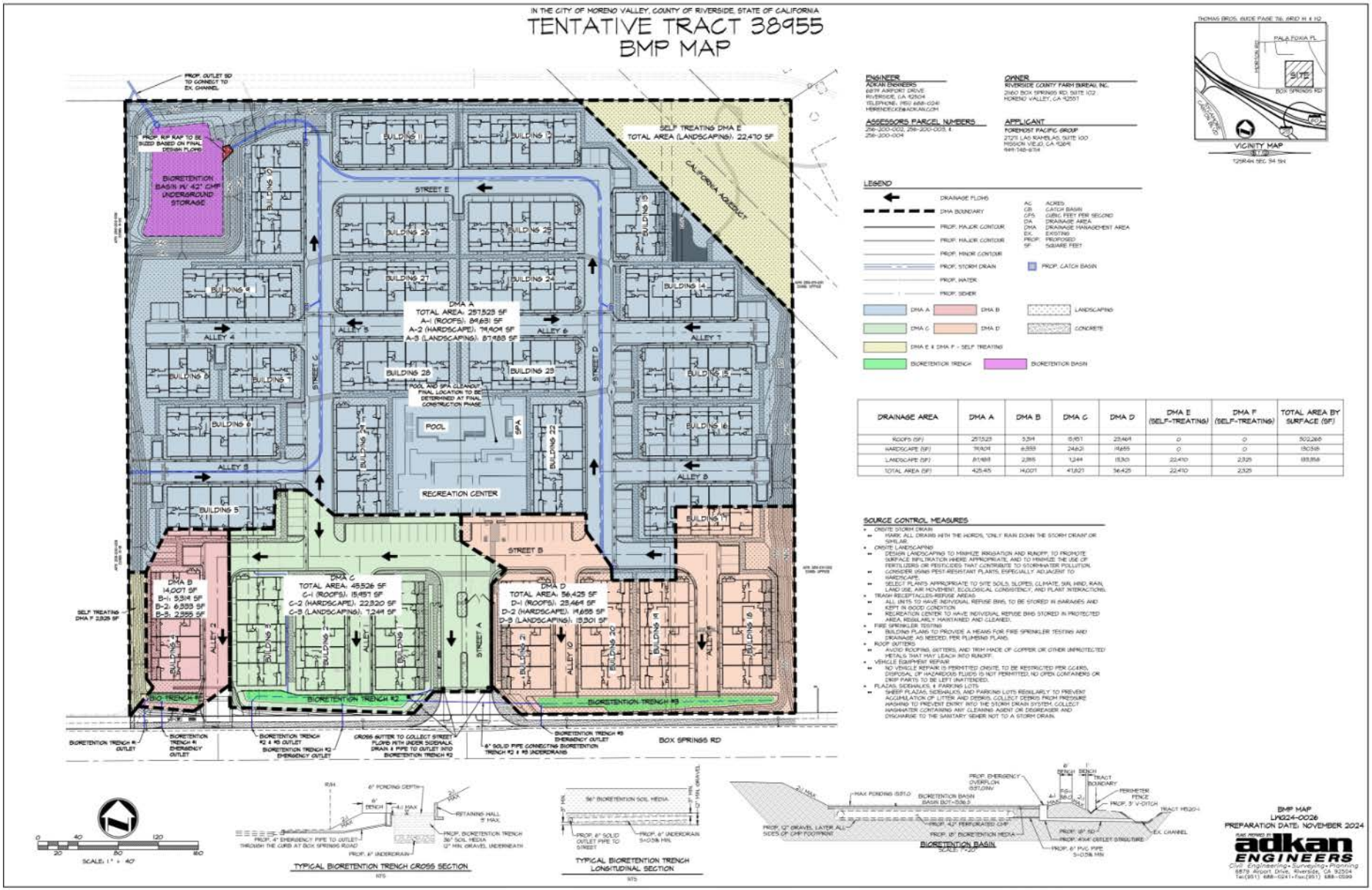
Figure 6: WQMP BMP Map



DRAINAGE AREA	DMA A	DMA B	DMA C	DMA D	DMA E (SELF-TREATING)	DMA F (SELF-TREATING)	TOTAL AREA BY SURFACE (SF)
ROOFS (SF)	257,523	5,314	15,451	23,464	0	0	302,266
HARDSCAPE (SF)	79,404	6,333	24,621	19,655	0	0	130,518
LANDSCAPE (SF)	87,488	2,355	1,244	13,301	22,470	2,325	128,856
TOTAL AREA (SF)	425,415	14,001	41,821	56,425	22,470	2,325	

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact requiring mitigation to be reduced to a level that is less than significant as indicated in the checklist on the following pages.

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

DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY):

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because of the incorporated mitigation measures and revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

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

Signature	Date
Grace Espino-Salcedo	City of Moreno Valley
Printed Name	For

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EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

4) Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

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

   a) Earlier Analyses Used. Identify and state where they are available for review.

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

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

6) Lead agencies are encouraged to incorporate into the checklist references to

information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

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

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

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code §21099 – Modernization of Transportation Analysis for Transit-Oriented Infill Projects – **Would the project:**				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Response: Less than Significant Impact. A scenic vista is generally defined as a view of undisturbed natural lands exhibiting a unique or unusual feature that comprises an important or dominant portion of the viewshed.[1] Scenic vistas may also be represented by a particular distant view that provides visual relief from less attractive views of nearby features. Other designated Federal and State lands, as well as local open space or recreational areas, may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape of nearby features.

According to the 2006 General Plan, the major aesthetic resources within the City include views of the mountains and southerly views of the valley. The major scenic resources within the city are visible from SR-60, the major transportation route in the area. In addition, as discussed in the 2006 General Plan and shown on Figure 7-2, Major Scenic Resources, of the General Plan Conservation Element, upon entering Moreno Valley from the west, the dominant view is of the Box Springs Mountains to the immediate north, which is visible from the Project Site.

According to the *Map OSRC-3: Scenic Resources and Ridgelines*, of the City's 2040 General Plan, the Project Site is not located within a designated view corridor. The nearest designated view corridor adjacent to the site is located approximately 1.75 miles west along Pigeon Pass Road, directed northwest towards the Box Springs Mountains. Distant views of the Box Springs Mountains to the north are afforded from vantage points throughout the majority of the City. Under clear atmospheric conditions, motorists and pedestrians traveling along adjacent roadways including Box Springs Road have partial views of these scenic resources, as the viewshed is obstructed by off-site trees, overhead powerlines, and buildings. However, these views are distant, obstructed, and not expansive. Thus, the project would not have a substantial adverse effect on a scenic vista in this regard and impacts would be less than significant. The proposed project would have a maximum building height not to exceed 30 feet, or two stories, consistent with surrounding development. As such, it is not expected that the new residential buildings would block views of or from the identified scenic resources**. Impacts to scenic resources would be less than significant.**

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

Response: No Impact. There are no officially designated State scenic highways in the City. The nearest scenic highways are State Route 74 (SR-74) (designated as eligible for listing), located approximately 15 miles southeast of the project site, and State Route 243 (SR-243) (officially designated), located approximately 24 miles southeast of the project site.[2] Views of the project site are not afforded from SR-74 or SR-243 due to intervening topography, structures, and vegetation. Thus, the project would not

[1] A viewshed is the geographical area which is visible from a particular location.

[2] California Department of Transportation State Scenic Highway System Map. nd. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa Accessed January 27, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
substantially damage scenic resources within a State scenic highway. **No impact would occur in this regard.**				
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

Response: Less than Significant Impact. The proposed project includes grading and construction of a 139-unit multi-family residential development and would include installation of right-of-way improvements, including sidewalk, street lighting, and landscaping. The project site is located within a moderately developed portion of the City and is surrounded by single- and multi-family residential development to the north, east, and west; office uses (non-profit community center) immediately to the east; and commercial uses (storage facility) to the south. Thus, for the purposes of this threshold, the analysis considers whether the project would conflict with applicable zoning or other regulations governing scenic quality.

The architectural design of the project would adhere to the requirements of 2006 General Plan Conservation Element and 2040 General Plan Land Use and Community Character Element Policy LCC.3-15, which requires that new project designs provide building placement variations, roofline variations, architectural projections, and other embellishments to enhance the visual interest along residential streets. The project design would also adhere to the 2040 General Plan Land Use and Community Character Element Policy LCC.3-13, which states that new and retrofitted fences and walls should incorporate landscape elements and changes in materials or texture to deter graffiti and add visual interest.

In addition, the proposed project is already consistent with the existing land use designation of Residential/Office (R/O) and zoning designation of Multi-Family Residential (R15). As such, no change of land use or zoning would be required with project implementation and the project would be consistent with development standards required by the R/O and R15 land use and zoning designations, as well as both the 2006 General Plan Conservation Element and 2040 Land Use and Community Character Element goals and policies related to scenic quality.

While project implementation would change the visual quality of the site and its surroundings, the proposed project would not degrade the visual quality of the project area because the project is consistent with the City's design guidelines and is consistent with the surrounding development. **Therefore, with adherence to the City's design policies and goals, impacts would be less than significant.**

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

Response: Less than Significant Impact. As the project is located in a moderately urbanized area, existing sources of light and glare typically come from vehicles traveling on Box Springs Road, streetlights, and exterior lighting and reflection from windows and roofs on surrounding existing development

Construction Impacts

Project construction could result in temporary glare impacts as a result of construction equipment and materials present at the site. However, based on the project's limited scope of construction activities, these sources of glare would not be substantial, compared to the existing building materials present in the

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

surrounding area. Construction of the proposed project would be restricted to the City's permitted construction hours in accordance with Moreno Valley Municipal Code Chapter 8.14.040, *Miscellaneous Standards and Regulations*, which are limited to between the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturday. Although some lighting may be required in the early morning or late evening, this lighting would be minimal and consistent with the existing sources of light from the surrounding residential uses, as well as the lights from traffic along Box Springs Road. **Therefore, no adverse light or glare impacts to adjacent properties would result from temporary construction activities and impacts would be less than significant.**

Operational Impacts

Project operations would create new light sources from interior and exterior illumination associated with building materials, windows, exterior lighting, and security lighting. Interior and exterior lighting would conform to the California Green (CALGreen) Building Standards Code and Moreno Valley Municipal Code Article VI, *Applications for Lighting*, Chapter 9.16.280, *General Requirements*. All outdoor lighting would be automatic and programmable to turn on at certain times as necessary as well as adjustable to dim the light intensity between 40 percent and 80 percent to meet the efficiency requirements of California's Building Energy Efficiency Standards (Title 24, Parts 6 and 11).

Although the project would increase light and glare in the surrounding area, light and glare produced on-site would be similar to that of the surrounding existing development. **Adherence to State and local standards and regulations would reduce long-term light and glare from the project, and operational impacts would be less than significant.**

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.3 – Community Design
   - Chapter 7 – Conservation Element – Section 7.8 – Scenic Resources
     - Figure 7-2 – Major Scenic Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.11 – Aesthetics
     - Figure 5.11-1 – Major Scenic Resources
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.110 – Light and Glare of the Moreno Valley Municipal Code.
   - Chapter 9.16 – Design Guidelines
   - Section 9.17.030 G – Heritage Trees

II. AGRICULTURE AND FOREST RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board.

Would the project:

a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland),	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				

Response: No Impact. The California Department of Conservation (DOC) manages the Farmland Mapping and Monitoring Program (FMMP), which identifies and maps significant farmland in the State of California.[3] Pursuant to Public Resources Code Section 21060.1, farmland is classified using a system of five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland is based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the National Resources Conservation Service.

According to the FMMP, a majority of the project site is identified as "Urban and Built-Up Land." The site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, while the site is subject to routine weed abatement activities (i.e., disking, tilling), no agricultural uses are currently supported on the project site. Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), to non-agricultural use. **No impact would occur.**

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

Response: No Impact. As previously discussed, the project site has land use and zoning designations of Residential/Office (R/O) and Multi-Family Residential (R15) with an allowable maximum density of 15 du/ac. This is consistent with surrounding residential development to the west. The properties to the north, east and south of the project site are zoned Residential (R5), Office and Commercial.

The proposed project is already consistent with the existing land use designation of Residential/Office (R/O) and zoning designation of Multi-Family Residential (R15). As such, no change of land use or zoning would be required with project implementation and the project would be consistent with development standards required by the R/O and R15 land use and zoning designations.

Further, no agricultural operations currently occur at the project site and the project site is not covered under an existing Williamson Act contract.[4] **Therefore, no impact would occur related to a conflict with existing zoning for agricultural use or a Williamson Act contract.**

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

Response: No Impact. The City does not have any zoning classifications for forestland, timberland, or timberland production zones. The project site is zoned Multi-Family Residential (R15) and is not occupied

[3] California Department of Conservation. n.d. Important Farmland Finder website, DLRP Important Farmland Finder Accessed January 27, 2025.

[4] California Department of Conservation. n.d. Riverside County Williamson Act Finder website, DLRP Important Farmland Finder Accessed January 27, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
or used for forestland or timberland. As such, project implementation would not conflict with existing zoning of, or result in the rezoning of forestland, timberland, or timberland zoned Timberland Production**. Therefore, no impact would occur.**				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
Response: No Impact. The City does not have any zoning classifications for forestland, timberland, or timberland production zones. Additionally, the project site is not currently occupied with forestland. **Therefore, the project would not result in any loss or conversion of forestland and no impact related to loss of forest land or conversation of forest land to non-forest use would occur.**				
e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
Response: No impact. According to the FMMP, a majority of the project site is identified as "Urban and Built-Up Land." The site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, while the site is subject to routine weed abatement activities (i.e., disking, tilling), no agricultural uses are currently supported on the project site. Additionally, the project site is not currently occupied with forestland. Therefore, no conversion of farmland to non-agricultural use and forest land to non-forest use will occur as a result of the project. **No impact would occur.**				
Sources: 1. Moreno Valley General Plan, adopted July 11, 2006 • Chapter 7 – Conservation Element – Section 7.7 – Agricultural Resources 2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006 • Section 5.8 – Agricultural Resources -Figure 5.8-1 – Important Farmlands 3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code				
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
Response: Less than Significant Impact. The project is located within the South Coast Air Basin (Basin), which is governed by the South Coast Air Quality Management District (SCAQMD). On December 2, 2022, the SCAQMD Governing Board adopted the *2022 Air Quality Management Plan* (2022 AQMP). The 2022 AQMP was approved and adopted by CARB on January 26, 2023. The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions and updated emission inventory methodologies for various source categories. Additionally, the 2022 AQMP utilized information and data from the Southern California Association of Governments (SCAG) and its *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). According to SCAQMD, if a project is consistent with the 2022 AQMP that is intended to bring the Basin into attainment for all criteria pollutants, it is considered to have less than significant cumulative impacts.				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

According to the SCAQMD CEQA *Air Quality Handbook*, in order to determine consistency with 2022 AQMP, two main criteria must be addressed:

Criteria 1: Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in the project's Air Quality, Greenhouse Gas, HRA and Energy Report, short-term construction impacts would not result in significant impacts based on the SCAQMD regional and local thresholds of significance. The Air Quality, Greenhouse Gas, HRA and Energy Report also found that long-term operational impacts would not result in significant impacts since emissions will not exceed the SCAQMD local and regional thresholds of significance. Therefore, the proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

Criteria 2: Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The 2020-2045 RTP/SCS includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this project, the City of Moreno Valley General Plan Land Use Plan defines the assumptions that are represented in the AQMP.

The Project Site has a General Plan land use designation of Residential/Office (R/O) Use and is zoned Multi-Family, High Density Residential (R-15), which is intended as an area for development of attached residential dwelling units with a maximum allowable density of 15 du/ac. The project proposes a gated community of 139 townhome units consisting of 29 buildings, as well as a clubhouse with pool and amenity area. Therefore, as the project is a multi-family residential use, the project is consistent with the City's existing land use designation. The proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project would not result in an inconsistency with the SCAQMD AQMP. **Therefore, impacts associated with compliance with the 2022 AQMP would be less than significant.**

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

Response: Less than Significant Impact.

CRITERIA POLLUTANTS

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of carbon monoxide.

Ozone (O_3). O_3 occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratosphere (the "good" ozone layer) extends upward from about 10

to 30 miles and protects life on Earth from the sun's harmful ultraviolet rays. "Bad" O_3 is a photochemical pollutant, and needs volatile organic compounds (VOCs), NO_x, and sunlight to form; therefore, VOCs and NO_x are O_3 precursors. To reduce O_3 concentrations, it is necessary to control the emissions of these O_3 precursors. Significant O_3 formation generally requires an adequate amount of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

While O_3 in the upper atmosphere (stratosphere) protects the Earth from harmful ultraviolet radiation, high concentrations of ground-level O_3 (in the troposphere) can adversely affect the human respiratory system and other tissues. O_3 is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with pre-existing lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible to the health effects of O_3. Short-term exposure (lasting for a few hours) to O_3 at elevated levels can result in aggravated respiratory diseases such as emphysema, bronchitis and asthma, shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, increased fatigue, as well as chest pain, dry throat, headache, and nausea.

Nitrogen Dioxide (NO_2). NO_x are a family of highly reactive gases that are a primary precursor to the formation of ground-level ozone and react in the atmosphere to form acid rain. NO_2 (often used interchangeably with NO_x) is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO_2 can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO_2 concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM_{10} arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, the California Air Resources Board (CARB) adopted amendments to the Statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25).

Fine Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to $PM_{2.5}$, both State and Federal $PM_{2.5}$ standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with pre-existing cardiopulmonary disease. In 1997, the U.S. Environmental Protection Agency (EPA) announced new $PM_{2.5}$ standards. Industry groups challenged the new standard in court and the implementation of the standard was blocked. However, upon appeal by the EPA, the United States Supreme Court reversed this decision and upheld the EPA's new standards. On January 5, 2005, the EPA published a final rule in the Federal Register that designates the basin as a nonattainment area for Federal $PM_{2.5}$ standards. On June 20, 2002, CARB adopted amendments for Statewide annual ambient particulate matter air quality standards. These standards were revised and established due to increasing concerns by CARB that previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current state standards during some parts of the year, and the Statewide potential for significant health impacts associated with particulate matter exposure was determined to be large and wide-ranging.

Sulfur Dioxide (SO_2). SO_2 is a colorless, irritating gas with a rotten egg smell; it is formed primarily by the combustion of sulfur-containing fossil fuels. SO_2 is often used interchangeably with SO_x. Exposure of a few

minutes to low levels of SO_2 can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include CO, CO_2, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The SCAQMD uses the terms VOC and ROG interchangeably (see below).

Reactive Organic Gases (ROG). Similar to VOC, ROG are also precursors in forming O_3 and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_x react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant.

SHORT-TERM CONSTRUCTION EMISSIONS

Construction activities associated with the proposed project would have the potential to generate air emissions. The project involves construction activities associated with the demolition of existing buildings, slab and parking lot, grading, building construction, paving, and architectural coating applications. The project would be constructed in one phase over approximately 20 months and is anticipated to import approximately 4,000 cubic yards (CY) of material during grading. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model version 2022.1.1.29 (CalEEMod) program defaults, which are provided in the project's Air Quality, Greenhouse Gas, HRA and Energy Report. ***Table 1, Regional Construction-Related Pollutant Emissions***, presents the anticipated daily short-term construction emissions. As indicated in ***Table 1***, criteria pollutant emissions during construction of the proposed project would not exceed the SCAQMD significance thresholds. Therefore, the project's total construction-related air emissions would be less than significant.

Table 1: Regional Construction-Related Pollutant Emissions

Activity	Pollutant (pounds/day)					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions[1]	***11.41***	***31.73***	***34.08***	***0.05***	***9.26***	***5.25***
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Roma Environmental, *Air Quality, Greenhouse Gas, Health Risk Assessment, and Energy Impact Analysis Report,* January 23, 2025, Table 6.

Notes: 1 = Includes both on-site and off-site emissions. On-site site preparation and grading PM-10 and PM-2.5 emissions show compliance with SCAQMD Rule 403 for fugitive dust. Construction, paving and painting phases may overlap.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emission that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather

conditions. Fugitive dust from grading, excavation and construction is expected to be short-term and would cease upon project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particulate health concern is the amount of PM_{10} generated as part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and SO_X combining with ammonia. $PM_{2.5}$ components from material in the Earth's crust, such as dust, are also present, with the amount varying in different locations.

The project would implement required SCAQMD dust control techniques (i.e., daily watering), limitations on construction hours, and adhere to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc.), to reduce PM_{10} and $PM_{2.5}$ concentrations. As depicted in ***Table 1***, total PM_{10} and $PM_{2.5}$ emissions would not exceed the SCAQMD thresholds during construction. Thus, PM_{10} and $PM_{2.5}$ emissions impacts associated with project construction would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, construction worker commutes to the project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to/from the site. As presented in ***Table 1***, construction equipment and worker vehicle exhaust emissions (i.e., ROG, NO_X, CO, SO_2, PM_{10} and $PM_{2.5}$) would not exceed the established SCAQMD thresholds for all criteria pollutants. Therefore, impacts in this regard would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. In accordance with the methodology prescribed by the SCAQMD, ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required by SCAQMD Regulation XI, Rule 1113 – *Architectural Coating*, all architectural coatings would comply with specifications on painting practices as well as regulation on the ROG content of paint. ROG emissions associated with the proposed project would be less than significant; refer to ***Table 1***.

Naturally Occurring Asbestos

Asbestos is listed as a toxic air contaminant (TAC) by the CARB and as a Hazardous Air Pollutant by the EPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. The nearest likely locations of naturally occurring asbestos, as identified in the General Location Guide for Ultramafic Rocks in California prepared by the California Division of Mines and Geology, is located at Asbestos Mountain in the San Jacinto Valley; approximately 52.8 miles southeast of the site. Due to the distance to the nearest natural occurrences of asbestos, the project site is not likely to contain asbestos and no impact would occur.

LONG-TERM OPERATIONAL EMISSIONS

The ongoing operation of the proposed project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the project-generated vehicle trips and through operational emissions from the ongoing use of the proposed project. The operational criteria air quality impacts created by the proposed project have been analyzed through use of the CalEEMod model; the operational emissions printouts from the CalEEMod model are provided in the project's Air Quality, Greenhouse Gas, HRA and Energy Report. The operating emissions were based on the year 2027, which is the anticipated opening year for the proposed project. Regional operational pollutant emissions are detailed in ***Table 2, Regional Operational Pollutant Emissions.*** The results show none of the criteria pollutants would exceed the SCAQMD regional thresholds. Therefore, the project's total operational-related air emissions would be less than significant.

Table 2: Regional Operational Pollutant Emissions

Activity	Pollutant (pounds/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	***9.34***	***4.79***	***45.16***	***0.10***	***8.77***	***2.31***
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Source: Roma Environmental, *Air Quality, Greenhouse Gas, Health Risk Assessment, and Energy Impact Analysis Report,* January 23, 2025, Table 8.

AIR QUALITY HEALTH IMPACTS

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O_3 precursors, VOCs and NO_x, affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

Further, as noted in the Brief of Amicus Curiae by the SCAQMD, the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form.[5] Furthermore, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD), SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.[6]

The SCAQMD acknowledges that health effects quantification from O_3, as an example is correlated with the increases in ambient level of O_3 in the air (concentration) that an individual person breathes. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO_x and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O_3 levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-related health impacts caused by NO_x or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. **Thus, as the project would not exceed SCAQMD thresholds for construction and operational air**

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
emissions, the project would have a less than significant impact relative to air quality health impacts.				
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐

Response: Less than Significant Impact with Mitigation Incorporated.

Localized Significance Thresholds

Localized Significance Thresholds (LSTs) were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Localized Significance Threshold Methodology* (dated June 2003, revised 2008) for guidance. The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in the *Localized Significance Threshold Methodology*. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM10, and PM2.5 from the proposed project could result in a significant impact to the local air quality. The emission thresholds were calculated based on the Metropolitan Riverside Source Receptor Area (SRA) 23 and a disturbance value of five acres per day. According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds.

Sensitive Receptors

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under age 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The nearest sensitive receptors are multi-family residential uses located directly adjacent to the western project boundary, single-family residential uses located adjacent to the northern project boundary (south of Martynia Court), approximately 180 feet (approximately 55 meters) to the east of the project site (east of Lewisia Avenue), and approximately 347 feet (approximately 106 meters) to the north of the project site (south of Pala Foxia Place); therefore, the SCAQMD Look-up tables for 25 meters were used.

Construction LST

Table 3, Local Construction Emissions at the Nearest Receptors, shows the localized construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ compared to the LSTs for SRA 23. As shown in ***Table 3***, the project's localized construction emissions would not exceed the LSTs for SRA 23. Therefore, localized significance impacts from project-related construction activities would be less than significant.

[5] South Coast Air Quality Management District, *Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

[6] San Joaquin Valley Air Pollution Control District, *Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno*, 2014.

Table 3: Local Construction Emissions at the Nearest Receptors

Activity	Onsite Pollutant Emissions (pounds/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	22.20	19.92	2.10	1.02
Site Preparation	31.64	30.18	9.03	5.20
Grading	16.27	17.91	3.49	2.00
Building Construction	9.85	12.97	0.38	0.35
Paving	7.12	9.94	0.32	0.29
Architectural Coating	0.86	1.13	0.02	0.02
SCAQMD Thresholds[1]	**270**	**1,577**	**13**	**8**
Thresholds Exceeded?	***No***	***No***	***No***	***No***

Source: Roma Environmental, *Air Quality, Greenhouse Gas, Health Risk Assessment, and Energy Impact Analysis Report,* January 23, 2025, Table 7.
Notes: 1 = The nearest sensitive receptors to the project include: multi-family residential uses located directly adjacent to the western project boundary, single-family residential uses located adjacent to the northern project boundary (south of Martynia Court), approximately 180 feet (~55 meters) to the east of the project site (east of Lewisia Avenue), and approximately 347 feet (~106 meters) to the north of the project site (south of Pala Foxia Place).

Operational LST

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources (such as heavy-duty trucks) that may spend extended periods queuing and idling at the site (e.g., industrial warehouse or transfer facilities). The proposed project does not include such uses. Thus, due to the lack of such emissions, no long-term LST analysis is needed. Operational LST impacts would be less than significant.

Local Carbon Monoxide Emission Impacts from Project-Generated Vehicular Trips

Carbon monoxide (CO) is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and federal CO standards, which are presented in the project's Air Quality, Greenhouse Gas, HRA and Energy Report.

To determine if the proposed project could cause emission levels in excess of the CO standards, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service (LOS) E or worse.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak CO concentrations in the Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest

intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority[7] evaluated the LOS in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be LOS E during the morning peak hour and LOS F during the afternoon peak hour.

The Trip Generation Assessment prepared for the proposed project showed that the project would generate a maximum of approximately 944 daily vehicle trips, with 56 trips (13 inbound, 43 outbound) produced in the AM peak hour and 71 trips (45 inbound, 26 outbound) produced in the PM peak hour on a "typical" weekday. The City Guidelines indicates a project may be exempt from preparing a Traffic Impact Analysis (TIA) if the project generates less than 100 peak hour trips and has less than 150 units. Therefore, the project would not require any specific intersection analysis that includes LOS. Therefore, as the project's contribution to the intersection volume is not enough to trigger a TIA, it would fall far short of 100,000 vehicles per day. No CO "hot spot" modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the ongoing use of the proposed project.

Diesel Emissions Health Risk Assessment

The proposed project would be exposed to TAC emissions from diesel truck emissions from nearby SR-60 and I-215 freeway vehicular diesel particulate matter (DPM) sources. The CARB Air Quality and Land Use Handbook (CARB Handbook) provides an advisory recommendation to avoid the locating of new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. The boundary lines of the proposed residential uses are within approximately 450 feet of the closest lane of the SR-60 freeway. Therefore, a health risk assessment (HRA) was conducted for the proposed project. The full HRA methodology, assumptions and calculations are provided in the project's Air Quality, Greenhouse Gas, HRA and Energy Report; the results are summarized below.

The assessment requires that a network of receptors be specified where the impacts can be computed at the various locations surrounding the project. Fourteen (14) receptors were located at proposed residential uses within the proposed project, as shown in the Air Quality, Greenhouse Gas, HRA and Energy Report. In addition, the identified sensitive receptor locations were supplemented by the specification of a modeling grid that extended around the proposed project to identify other potential locations of impact. A receptor Pool_10 was included to show the potential exterior impacts at the pool/clubhouse area; however, it should be noted that thresholds would not apply at this location as no sensitive receptor would be living at this location. To ensure that impacts to receptors of all heights were assessed, the receptor height is 0 meters.

Health risks from diesel particulate matter are twofold. First, diesel particulate matter is a carcinogen according to the State of California. Second, long-term chronic exposure to diesel particulate matter can cause health effects to the respiratory system. Each of these health risks is discussed below.

Cancer Risks

According to the *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments*, released by the Office of Environmental Health Hazard Assessment (OEHHA) in February 2015 and formally adopted in March 2015, the residential inhalation dose for cancer risk assessment should be calculated using the following formula:

[Dose-air (mg/(Kg-day)]*Cancer Potency*[1x10-6] = Potential Cancer Risk

Where:

Cancer Potency Factor = 1.1

[7] Metropolitan Transportation Authority, *2004 Congestion Management Plan for Los Angeles County*, Adopted July 22, 2004.

Dose-inh = (C¬air * DBR * A * EF * ED *ASF*FAH* 10-6) / AT

Where:

Cair [Concentration in air (µg/m3)] = (Calculated by AERMOD Model)

DBR [Daily breathing rate (L/kg body weight – day)] = 261 for adults, 572 for children, and 1,090 for infants, and 361 for 3rd trimester per SCAQMD Permit Application Package "N" Table 4.1 D guidance.

A [Inhalation absorption factor] = 1

EF [Exposure frequency (days/year)] = 350

ED [Exposure duration (years)] = 30 for adults (for an individual who is an adult at opening year), 14 for children (from 2-16 years), 14 for adults (from 16-30 years), 2 for infants, and 1 for 3rd Trimester

ASF [Age sensitivity factor) = 10 for 3rd trimester to 2 years of age, 3 for 2 to 16 years of age, and 1 for 16 to 30 years of age

FAH [Fraction of time spent at home] = 0.85 for 3rd trimester to 2 years of age, 0.72 for 2 to 16 years of age, and 0.73 for 16 to 30 years of age

106 [Micrograms to milligrams conversion]

AT [Average time period over which exposure is averaged in days] = 25,550

The full assessment of cancer-related health risk to sensitive receptors within the project vicinity is based on the following most-conservative scenario. An unborn child in its 3rd trimester is potentially exposed to DPM emissions (via exposure of the mother) during the opening year. That child is born opening year and then remains at home for the entire first two years of life. From age 2 to 16, the child remains at home 100 percent of the time. From age 16 to 30, the child continues to live at home, growing into an adult that spends 73 percent of its time at home and lives there until age 30.

Based on the above ultra-conservative assumptions, the 30.25-year, cumulative carcinogenic health risk (3rd trimester [-0.25 to 0 years] + infant [0-2 years] + child [2-16 years] + adult [16-30 years]) to an individual born during the opening year of the project and located in the project vicinity for the entire 30-year duration, all receptors on the project site (in all of the buildings) would be exposed to a cancer risk in excess of 10 in a million; as shown in ***Table 4, Cumulative Carcinogenic Risk 30.25-Year Exposure Scenario***. Receptor Pool_10 shows the impacts to an individual that would reside in the pool area for 30 years; however, as this is not a realistic scenario, as no one would be permanently living in the pool area, this data point has been included to show that activities within the pool area are accompanied by potential health risk.

As shown in ***Table 4,*** the cancer risk would be reduced within residential units on the project site with incorporation of minimum efficiency reporting value (MERV) 13 filtration, as mitigation. **Mitigation Measure AQ-1** would require the installation of MERV 13 filters on all proposed residential units on the project site, which would remove a substantial amount of particulates, including DPM. MERV 13 filters have a particle size removal efficiency rating of greater than at least 90 percent PM10 and a minimum of 85 removal efficiency for PM2.5. A MERV 13 filter creates more resistance to airflow because the filter media becomes denser as efficiency increases. The MERV filters do not remove gaseous pollutants. With the incorporation of MERV 13 filtration in all of the proposed dwelling units on-site, the cancer risk would be reduced to less than 10 in a million at all residential receptor locations on-site (with doors and windows closed). **Therefore, cancer risks relative to DPM associated with project implementation would be reduced to a less than significant level with mitigation incorporated.**

Table 4: Cumulative Carcinogenic Risk 30.25-Year Exposure Scenario

Receptor ID	Cumulative RISK (per million)
1	30.81
2	28.39
3	23.94
4	27.37
5	25.92
6	24.33
7	23.30
8	21.90
9	20.77
Pool_10[2]	17.68
11	16.68
12	17.65
13	14.60
14	13.23
Receptor ID	**Cumulative RISK (per million) with Incorporation of MERV 13 Filtration Mitigation[1]**
1	4.62
2	4.26
3	3.59
4	4.11
5	3.89
6	3.65
7	3.49
8	3.29
9	3.12
Pool_10[2]	17.68
11	2.50
12	2.65
13	2.19
14	1.98

Source: Roma Environmental, *Air Quality, Greenhouse Gas, Health Risk Assessment, and Energy Impact Analysis Report,* January 23, 2025, Table 18.
Notes: 1 = 85 percent reduction in PM2.5
2 = Pool area cannot be mitigated via MERV filtration; however, sensitive receptors will not be residing at the pool area.

Non-Cancer Risks

The relationship for non-cancer health effects is given by the equation:

HIDPM = CDPM/RELDPM

Where,

HIDPM = Hazard Index; an expression of the potential for non-cancer health effects.

CDPM = Annual average diesel particulate matter concentration in µg/m3.

RELDPM = Reference Exposure Level (REL) for diesel particulate matter; the diesel particulate matter concentration at which no adverse health effects are anticipated.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The RELDPM is 5 µg/m3. The OEHHA as protective for the respiratory system has established this concentration. Using the maximum DPM concentration at the closest receptor for the opening year, the resulting Hazard Index is:

HIDPM = 0.04139 /5 = 0.0083

The criterion for significance is a Hazard Index increase of 1.0 or greater. **Therefore, the proposed project would have a less than significant impact due to the non-cancer risk from diesel emissions from the diesel traffic along SR-60 and I-215.**

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

Response: Less than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not include any uses identified by the SCAQMD as being associated with odors. Potential sources that may emit odors during the on-going operations of the proposed project would include odor emissions from intermittent delivery/trash truck emissions and trash storage areas. Due to the distance of the nearest receptors from the project site and through compliance with SCAQMD's Rule 402, a less than significant impact related to odors would occur during the ongoing operations of the proposed project.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed project. Diesel exhaust and VOCs would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site and therefore should not reach an objectionable level at the nearest sensitive receptors. As such, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. **Impacts would be less than significant.**

MITIGATION MEASURES

AQ-1 During project construction, the Project Contractor shall ensure the provision and installation of minimum efficiency reporting value (MERV) 13 filtration on all residential HVAC systems within the project boundary.

SIGNIFICANCE OF IMPACT AFTER MITIGATION

Implementation of **Mitigation Measure AQ-1** would ensure that potentially significant air quality impacts consisting of an exposure of cancer risks (freeway-related DPM emissions) to sensitive receptors associated with the project are mitigated, thereby reducing impacts to a less than significant level.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 5 – Circulation Element
   - Chapter 6 – Safety Element – Section 6.6 – Air Quality
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.3 – Air Quality

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

- Figure 5.3-1 – South Coast Air Basin
- Appendix C – Air Quality Analysis, P&D Consultants, July 2003

3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.050 – Air Quality of the Moreno Valley Municipal Code
   - Section 9.10.150 – Odors of the Moreno Valley Municipal Code
   - Section 9.10.170 – Vibration of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Section 12.50.040 – Limitations on Engine Idling

IV. BIOLOGICAL RESOURCES – Would the project:

The analysis and findings throughout this section are based on the following technical studies:

- *Biological Resources Assessment and MSHCP Consistency Analysis*, prepared by MNS Engineers, dated January 2025, and as provided as **Appendix 2A** of this IS/MND**;** *Results of Focused Burrowing Owl (Athene cunicularia) Surveys,* prepared by MNS Engineers, as provided as **Appendix 2B** of this IS/MND;
- *2025 Crotch's Bumblebee Survey Report,* prepared by Osprey Environmental Associates, dated June 26, 2025, and as provided as **Appendix 2C** of this IS/MND.

Environmental Setting

The project area is located within a partially developed portion of the City of Moreno Valley, north of Box Springs Road and west of Lewisia Avenue. Natural habitats within the survey area have been heavily disturbed due to routine weed abatement activities (i.e., disking, tilling), resulting in heavily disturbed and compacted surface soils. As such, onsite native vegetation communities are limited to 0.25 acres of buckwheat scrub, with the majority of the site mapped as developed (1.4 acres) and disturbed (7.35 acres). The buckwheat scrub vegetation is scattered in small patches throughout the site around rocky outcroppings, which appear to have prevented vegetation removal and disking. The developed area of the property is an existing commercial/office development with a paved parking lot. Plant species observed in the disturbed areas include turkey mullein (*Croton setiger*), telegraph weed (*Heterotheca grandiflora*) and short-podded mustard (*Hirschfeldia incana*). The project site is not located within any federally designated Critical Habitat.

Focused surveys were conducted for burrowing owl (*Athene cunicularia)* and Crotch's bumble bee (*Bombus crotchii)* in 2025. No burrowing owl signs or burrows were observed within the survey area. Additionally, no Crotch's bumble bee or other *Bombus* species were detected.

Land uses in the immediate vicinity of the survey area include residential, park and commercial land uses. Residential uses are located to the west and north of the survey area, park resources to the northeast, with commercial uses along the south and southeast of the survey area.

The project site is located within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) administered by the Western Riverside County Regional Conservation Authority (RCA). The City of Moreno Valley is a signatory to the MSHCP.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Sera) Have a substantial adverse effect, either directly or through habitat modifications, on any species	☐	☒	☐	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				

Response: Less than Significant Impact with Mitigation Incorporated. MNS Senior biologist Mello Dee Hrdlicka conducted a literature review and habitat assessment within the project site and a 500-foot buffe on January 10, 2025. The survey included an assessment for state and federal jurisdictional waters and mapping of the vegetation communities. The results of the assessment are summarized in *Biological Resources Assessment and MSHCP Consistency Analysis*, prepared by MNS Engineers, dated special-status plant species have been recorded in the USGS *Riverside East, Fontana, San Bernardino South, Steele Peak, Redlands, Riverside West, Sunnymead, Lake Mathews, and Perris, California* 7.5-minute quadrangles by the CNDDB and California Native Plant Society (CNPS). No special-status plant species were observed within the survey area during the field survey. The survey area is primarily comprised of disturbed/ruderal non-native herbs and disturbance-tolerant native wildflowers. Additionally, routine weed abatement within the survey area has reduced the potential for the survey area to provide suitable habitat for special-status plant species. Based on existing site conditions and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, it was determined that the special-status plant species identified by the CNDDB and CNPS are not expected to occur within the survey area. The project site is not located within an area designated by the MSHCP as supporting narrow endemic or criteria area plant species. Therefore, no special-status plant species are expected to occur on the project site.

Sensitive Wildlife Species

Sixty-four (64) special-status wildlife species have been recorded in the USGS *Riverside East, Fontana, San Bernardino South, Steele Peak, Redlands, Riverside West, Sunnymead, Lake Mathews, and Perris, California* 7.5-minute quadrangles by the CNDDB. No special-status wildlife species were observed within the survey area during the field survey. Based on the results of the field survey and a review of specific habitat preferences, occurrence records, known distributions, and elevation ranges, it was determined that the survey area has a low potential to support burrowing owl (*Athene cunicularia* [BUOW}; a State Species of Special Concern [SSC]), Cooper's hawk (*Accipiter cooperii*; a California SSC), loggerhead shrike (*Lanius* ludovicianus; a California SSC), California horned lark (*Eremophilia alpestris actia*; a California Watchlist), western mastiff bat (*Eumops perotis californicus*; a State SSC), and western yellow bat (*Lasiurus xanthinus*; a State SSC), Orange-throated whiptail (*Aspidoscelis hyperythrus*;; a State SSC), and red-diamond rattlesnake (*Crotalus ruber*; a State SSC) and Crotch's bumble bee (*Bombus crotchi)i;* a state Candidate species. All remaining special-status wildlife species identified during the literature review and records search are not expected to occur within the survey area.

Mammals

Two (2) mammal species were observed during the field survey: California ground squirrel (*Otospermophilus beecheyi*) and desert cottontail (*Sylvilagus audubonii*). The project site and surrounding area provide suitable habitat for additional mammalian species adapted to living in edge or urban environments. However, the routine weed abatement and surrounding development limits the potential for mammalian species to occur. Other common mammalian species that may occur within the survey area include coyote (*Canis latrans*), opossum (*Didelphis virginiana*), striped skunk (*Mephitis mephitis*), and raccoon (*Procyon lotor*). Bats occur throughout most of southern California and may use the survey area as foraging habitat although it is heavily disturbed. However, there is no roosting habitat present within the survey area.

Stephens' kangaroo rat (genus *Dipodomys*)

Stephens' kangaroo rat (SKR) is federally listed as endangered, and State listed as threatened. SKR occurs in western Riverside County, existing in fragmented populations due to the urban landscape. Separate from

the MSHCP, U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) issued the Riverside County Habitat Conservation Agency a Section 10(a) Permit and CFGC Section 2081 Management Authorization in 1996 establishing the Long-Term Stephens' Kangaroo Rat Habitat Conservation Plan (HCP).

Based on a review of the SKR HCP, the survey area is located outside the boundaries of the SKR HCP and associated Core Reserves. According to the CNDDB, there are sixteen (16) occurrence records for SKR within the USGS *Riverside East, California* 7.5-minute quadrangle. The closest, presumed extant occurrence record was recorded in 1989 in Moreno Valley, approximately 0.25-mile northwest of the survey area. Suitable sparse coastal sage scrub and open grassland habitats with sandy soils preferred by this species for burrowing are not present within the survey area. The survey area is comprised of disturbed habitat that is subject to routine weed abatement, resulting in heavily disturbed and compacted surface soils which likely precludes this species from occurring.

Crotch's bumble bee (*Bombus crotchii)*

The Crotch's bumble bee (*Bombus crotchii*) is one of four bee species that CDFW nominated as candidates for listing under the California Endangered Species Act (CESA) in 2019. The species is associated with grassland and sage scrub vegetation and nests underground, often in abandoned rodent nests. The species is not covered by the Western Riverside MSHCP.

The project site supports disturbed non-native grassland, which may provide habitat for Crotch's bumblebee. Implementation of **Mitigation Measure BIO-3**, which requires that focused surveys l be conducted in accordance with CDFW's Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023d) the season immediately prior to ground disturbing activities are scheduled to occur. As such, focused surveys were performed in May and June 2025 with negative results. The survey results suggest that the project site currently provides minimal opportunities to support Crotch's bumble bee foraging, nesting, or overwintering, which is consistent with the absence of Crotch's bumble bee detections during focused surveys.

Birds

The Migratory Bird Treaty Act (MBTA) implements international treaties between the United States and other nations devised to protect migratory birds, their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. The state of California has incorporated the protection of birds of prey in California Fish and Game Code (CFGC) Sections 3800, 3513, and 3503.5. All raptors and their nests are protected from take or disturbance under the MBTA (16 United States Code [USC] Section 703 et seq.) and California statute (CFGC Section 3503.5).

Direct impacts to native vegetation communities and removal of trees during project construction could result in direct impacts to bird nests, which would be considered significant absent mitigation. The project site provides marginal foraging and nesting habitat for a variety of resident and migrant bird species that are adapted to a high degree of disturbance such as traffic, noise, and light pollution associated with the surrounding development. Additionally, the project site provides nesting habitat for avian species that nest on the open ground (e.g., killdeer [*Charadrius vociferus*], western meadowlark [*Sturnella neglecta*]). No nests were observed within the project site during the field survey.

Construction activities that occur during the avian nesting season (generally February 1 to August 31) could disturb nesting sites for bird species protected under the Fish and Game Code or MBTA. The removal of existing ornamental trees and bird houses during the nesting season could result in direct harm to nesting birds, while noise, light, and other man-made disturbances may cause nesting birds to abandon their nests.

Implementation of **Mitigation Measure BIO-1**, which requires a pre-construction nesting bird clearance survey to determine the presence/absence, location, and status of any active nests on or adjacent to the

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

project site, would reduce potential impacts to nesting and migratory birds to less than significant by limiting the removal of trees, shrubs, or any other potential nesting habitat to outside the avian nesting season, which generally extends from February 1 through August 31. If the nesting bird clearance survey indicates the presence of nesting birds, **Mitigation Measure BIO-1** requires buffers to ensure that any nesting birds are protected pursuant to the MBTA. **Impacts for both sensitive wildlife species and migratory birds would be reduced to a less than significant level with mitigation incorporated.**

Burrowing owl *(Athene cunicularia)*

The burrowing owl is designated as a species of special concern by CDFW and is a fully covered species under the MSHCP. The species is typically found in grassland, shrub steppe, and desert habitat types, however, can also be found in agricultural areas, ruderal fields, and pastures, as well as in urban environments such as vacant lots, flood control facilities, and open spaces. Burrowing owls require underground burrows or other cavities for nesting, roosting and shelter. Burrows used by the owls are usually dug by other species such as California ground squirrel (*Spermophilus beecheyi*) and round-tailed ground squirrel (*Citellus tereticaudus*). As such, the presence of colonial mammal burrows is often an indication that burrowing owls may be present. Burrowing owls have also been found occupying man-made cavities, such as buried and non-functioning drainpipes, standpipes, and dry culverts.

The results of the biological survey concluded that the project site is sparsely vegetated with a variety of low-growing plant species that allow for open line-of-sight and foraging opportunities for BUOW. Ground squirrels were noted throughout the property, however, only a few burrows were observed. No BUOWs, sign (i.e., pellets, feathers, castings, or whitewash), occupied burrows, or remnant burrows were observed. In accordance with the *Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area*, if BUOW habitat occurs onsite, both focused surveys and pre-construction clearance surveys are required. Focused BUOW surveys will be conducted in spring 2025 following the MSHCP survey protocol, *Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area.*

The proposed project would implement **Mitigation Measure BIO-2** to ensure potential impacts to burrowing owls are reduced to a less than significant level by requiring a pre-construction survey prior to ground-disturbing activities. **With implementation of Mitigation Measure BIO-2, impacts to burrowing owl would be less than significant.**

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

Response: Less than Significant Impact with Mitigation Incorporated. Based upon a review of current and historic aerial photographs and USGS topographic map and the results of the project site visit, potential state or federal jurisdictional water features within the survey area are limited to an existing open concrete channel. The channel originates west of the project site and extends for approximately 400 feet along the northern site boundary to an existing outlet structure which conveys stormwater for the surrounding residential area through the City's storm drain system. The remainder of the mapped feature appears to have been diverted into the storm drain channel and filled during construction of the adjacent residential and park development to the north. The channel appears to be frequently maintained and is completely free of soil and vegetation.

Implementation of the proposed project would result in temporary disturbance to the existing concrete outlet structure (approximately 0.10-acres) to install an outlet from the proposed project water quality basin. The segment of the channel disturbed during construction of the outlet will be returned to pre-construction conditions, including grade and replacement of the concrete bottom. Although the channel is concrete-

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
lined, it is expected to be considered a Water of the State, requiring issuance of both a Waste Discharge Requirement (WDR) from the RWQCB and a Section 1602 Streambed Alteration Agreement (SAA) from the CDFW prior to construction within the channel, as described in **Mitigation Measure BIO-4**. **With the implementation of Mitigation Measure BIO-4, potential impacts to state and federal jurisdictional waters would be reduced to a less than significant level.**				
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
Response: No Impact. Based on a review of the *Custom Soil Resource Report for Western Riverside Area, California*, none of the soil classes (e.g., Bosanko, Auld, Altamont, and Porterville series and Traver-Domino Willows association) known to be associated with vernal pool habitat occur within the project site. The mapped soils throughout the project site primarily consist of sandy loam textures and not the clay soil textures which are needed to form the impermeable restrictive duripan layer below the soils surface. Therefore, no direct or indirect impacts are expected to occur relative to vernal pools. As discussed above, in item 4(b), potential state and federal jurisdictional waters within the survey area are limited to an existing concrete lined drainage that extends along the northwest boundary of the property. No riparian vegetation, natural streambeds, or wetlands were identified within the survey area. **No impact would occur in this regard.**				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
Response: Less than Significant Impact. The survey area is located within a moderately developed area of Moreno Valley with a small area designated as park open space to the northeast that could function as something of a movement corridor for mammals. However, surrounding roads and residential development have fragmented the connection between the survey area and surrounding open space and naturally occulting vegetation communities. The disturbed landscape of the survey area and limited vegetation for cover most likely precludes the movement of wildlife through the survey area. Further, elevated noise levels, vehicle traffic, lighting, and human presence associated with Box Springs Road, Lewisia Avenue, Morton Road, and surrounding residential development all decrease the suitability of the survey area to be used as a wildlife movement corridor or linkage. **Therefore, a less than significant impact relative to migratory wildlife corridors would occur.**				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
Response: No Impact. The Moreno Valley Municipal Code addresses tree removal on all land uses, for all projects, in all districts requiring City approval. The Moreno Valley Municipal Code addresses requirements for preservation and protection of heritage trees within the City located on both private and public property. Under Title 9 Chapter 9.17 of the Moreno Valley Municipal Code, the City has designated two tree species as “heritage trees.” Based on the Biological Resources Assessment and MSHCP Consistency Analysis, the trees located on the project site do not qualify as heritage trees according to the definition in Chapter 9.17.030, *Landscape and Irrigation Design Standards,* which states that heritage trees include any tree which “defines the historical and cultural character of the city including older Palm and Olive trees, and/or				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

any tree designated as such by official action" and include any tree which "is fifteen (15) inch diameter measured twenty-four (24) inches above ground level or that have reached a height of fifteen (15) feet or greater."

No potential heritage trees were identified on the project site during the field survey and site visit. Onsite trees were limited to smaller (less than 15-inch diameter) fan palms and pepper trees. No tree surveys or arborist reviews were recommended in the Biological Resources Assessment and MSHCP Consistency Analysis. **Therefore, the project would not conflict with a local policy protecting biological resources and there are no impacts to heritage trees.**

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Response: Less than Significant Impact with Mitigation Incorporated. The project site is located within the boundaries of the MSHCP. According to the RCA's online MSHCP Information Application, the project site is not located within any Subunits, Criteria Cells, Conservation Areas, Cores/Linkages, or Public/Quasi-Public (P/QP) Lands identified by the MSHCP. However, the project site is located within a designated survey area for BUOW and is subject to the procedures outlined in the *Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area*. In addition, the protection of species associated with riparian/riverine resources and vernal pools is also required by the MSHCP and is discussed below.

Burrowing Owl

Based on the results of the field survey, and as discussed above in Impact 4(a), the project site provides suitable foraging habitat for burrowing owls. No burrows suitable to support burrowing owl were observed due to disking and other ground disturbance, however, there are small areas along the north and eastern site boundaries that could provide habitat. Due to the presence of suitable habitat for burrowing owls, focused surveys will be conducted in Spring 2025 to confirm the presence/absence of burrowing owl within the project site and 500-foot buffer to satisfy the requirements of the Western Riverside County MSHCP. Additionally, a preconstruction survey will be conducted 30-days prior to construction in order to avoid impacts to active burrowing owl nests. Therefore, project-related activities are not expected to result in any direct or indirect impacts to BUOWs or occupied BUOW burrows on or within the vicinity of the survey area. However, as discussed in Response 4.4(a) above, focused surveys and a 30-day preconstruction survey will be conducted prior to any ground disturbance to avoid direct take of burrowing owls, as described in **Mitigation Measure BIO-2**.

Riparian/Riverine Resources

As discussed above, potential state or federal jurisdictional water features within the survey area are limited to an existing open concrete channel to the north of the project site. The channel is part of the City stormdrain system and was built to convey stormwater from the existing surrounding residential development to the underground stormdrain. Because the concrete channel does not support any vegetation or provide water quality benefits through infiltration and functions as part of the City's overall underground stormdrain system, the offsite channel would not be considered a riverine-riparian feature and no DBESP is required. The concrete that is temporarily removed to construct an outlet from the proposed project water quality basin will be replaced. The project will not result in direct or indirect impacts to riparian/riverine resources.

Vernal Pools

One of the factors for determining the presence of vernal pools would be demonstrable evidence of seasonal ponding in an area of topographic depression that is not subject to flowing waters. Prior to conducting the

habitat assessment, a review of historical aerial photographs was conducted. In addition, a review of the USDA *Custom Soil Resource Report for Western Riverside Area, California,* was also conducted to determine the soil associations within the project site. The MSHCP lists two general classes of soils known to be associated with special-status plant species and presence of vernal pool habitat: clay soils and Traver-Domino Willow association soils. The specific clay soils known to be associated with special-status species/vernal pool habitat within the MSHCP Plan Area include Bosanko, Auld, Altamont, and Porterville series soils, whereas Traver-Domino Willows association includes saline-alkali soils largely located along floodplain areas of the San Jacinto River and the Salt Creek flood control channel.

Based on a review of the *Custom Soil Resource Report for Western Riverside Area, California*, none of the soil classes (e.g., Bosanko, Auld, Altamont, and Porterville series and Traver-Domino Willows association) known to be associated with vernal pool habitat occur within the project site. The mapped soils throughout the project site primarily consist of sandy loam textures and not the clay soil textures which are needed to form the impermeable restrictive duripan layer below the soils surface. Therefore, no direct or indirect impacts are expected to occur relative to vernal pools.

Conclusion

With implementation of Mitigation Measure BIO-2, the project would not conflict with the provisions of the MSHCP, and potential impacts would be reduced to a less than significant level.

MITIGATION MEASURES

MM BIO-1: **Nesting Birds.** If project-related activities are to be initiated during the nesting season (February 1 to August 31), a pre-construction nesting bird clearance survey shall be conducted by a qualified biologist no more than three (3) days prior to the start of any vegetation removal of ground disturbing activities, the qualified biologist shall survey all suitable nesting habitat within the project impact area, and areas within a biologically defensible buffer zone surrounding the project impact area. If no active bird nests are detected during the clearance survey, project activities may begin, and no additional avoidance and minimization measures shall be required. If an active bird nest is found, the species shall be identified, and a “no-disturbance” buffer shall be established around the active nest. The size of the “no-disturbance” buffer shall be increased or decreased based on the judgment of the qualified biologist and level of activity and sensitivity of the species. The qualified biologist shall periodically monitor any active bird nests to determine if project related activities occurring outside the “no-disturbance” buffer disturb the birds and if the buffer should be increased. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, project activities within the “no disturbance” buffer may occur following an additional survey by the qualified biologist to search for any new bird nests in the restricted area.

MM BIO-2: **Burrowing Owl (BUOW).** A pre-construction clearance survey would be required to reconfirm the absence of BUOW within the project impact area and maintain compliance with the MSHCP, MBTA, and CFGC. In accordance with the MSHCP, the pre-construction clearance survey would need to be conducted by a qualified biologist no more than 30 days prior to initiating any ground disturbing activities to avoid direct take of BUOWs. Once the survey is completed, the qualified biologist should prepare and submit a final report documenting the results of the clearance survey to the City of Moreno Valley for review and file. If no BUOWs or occupied burrows are detected, project activities may begin, and no additional avoidance or minimization measures would be required. However, if an occupied burrow is found within the project impact area during the clearance survey, a DBESP report outlining specific avoidance, minimization, and compensatory mitigation methods that will be implemented to avoid impacts to BUOW would need to be prepared and submitted to

the Wildlife Agencies (CDFW and USFWS) for approval prior to initiating project activities.

MM BIO-3: **Focused Crotch's Bumblebee Surveys**. If the Crotch bumble bee is no longer a candidate or listed species under the California ESA at the time ground disturbing activities, then no additional protection measures are proposed for this species.

If the Crotch bumble bee is legally protected under the California ESA as a candidate or listed species at the time of Project construction, focused surveys shall be conducted in accordance with CDFW's Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023d) the season immediately prior to ground disturbing activities are scheduled to occur. A minimum of three Crotch bumble bee focused surveys shall be conducted at 2 to 4 week intervals (ideally monthly) during the colony active period (April through August) when Crotch bumble bees are most likely to be detected. Non-lethal, photo voucher surveys shall be completed by a biologist who holds a Memorandum of Understanding to capture and handle Crotch bumble bee (if nesting and chilling protocol is to be utilized) or by a CDFW approved biologist experienced in identifying native bumble bee species (if surveys are restricted to visual surveys that will provide high-resolution photo documentation for species verification).

If an active Crotch bumble bee nest is detected, an appropriate no disturbance buffer zone (including foraging resources and flight corridors essential for supporting the colony) shall be established around the nest to reduce the risk of disturbance or accidental take and the designated biologist shall coordinate with CDFW to determine if an Incidental Take Permit under Section 2081 of the California ESA will be required. Nest avoidance buffers may be removed at the completion of the flight season and/or once the qualified biologist deems the nesting colony is no longer active and CDFW has provided concurrence of that determination. If no nests are found but the species is present, a full-time qualified biological monitor shall be present during vegetation removal or ground disturbing activities that are scheduled to occur during the queen flight period (February through March), colony active period (March through September), and/or gyne flight period (September through October). Because bumble bees move nest sites each year, three preconstruction nesting surveys shall be required during each subsequent year of construction, regardless of the previous year's findings, whenever vegetation removal and ground disturbing activities are scheduled to occur during the flight season (February through October).

The following mitigation measure is recommended to address the temporary impacts to state and federal jurisdictional waters associated with the concrete-lined channel located at the northern site boundary:

MM BIO-4: **State and Federal Jurisdictional Waters.** Prior to ground-disturbing activities in waters potentially regulated by state and federal agencies, the Project Applicant shall confer with U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB) and, if required, obtain appropriate authorization. The Applicant shall implement all conditions associated with regulatory agency agreements and authorizations including compensatory mitigation (at a minimum 1:1 ratio) and, unless otherwise specified by the USACE, CDFW and/or the RWQCB, shall implement best management practices specified by the USACE, CDFW

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

and/or the RWQCB to minimize adverse impacts to streams and watersheds.

SIGNIFICANCE OF IMPACT AFTER MITIGATION

With implementation of **Mitigation Measures BIO-1, BIO-2, BIO-3,** and **BIO-4**, as well as adherence to the standard conditions and requirements, the project would comply with the requirements of the MSHCP, MBTA and Moreno Valley Municipal Code. **Compliance would reduce impacts to less than significant levels**.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.1 – Biological Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.9 – Biological Resources
     - Figure 5.9-1 – Planning Area Biological Geographic Sections
     - Figure 5.9-2 – Planning Area Vegetation Community
     - Figure 5.9-3 – Project Site Location within the MSHCP Area
     - Figure 5.9-4 – Reche Canyon/Badlands Area Plan
   - Appendix E – Biological Resources Study, Appendix E
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.17.030 G – Heritage Trees
4. Moreno Valley Municipal Code Chapter 8.60 – Threatened and Endangered Species
5. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), http://www.wrc-rca.org/about-rca/multiple-species-habitat-conservation-plan/
6. Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP), Governing Documents | RCHCA, CA

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐

Response: Less than Significant Impact. The Cultural Resources Assessment conducted for the proposed project included an archaeological field survey, archaeological sensitivity analysis, and a records search to identify previously recorded prehistoric and historic cultural resources and cultural resource surveys within a 1-mile radius of the project area. The records search was conducted by Jamie Lennox of the Southern California Information Center.

Southern California Information Center Results

No cultural resources are located within the project area. A total of nineteen resources are documented within the 1-mile search radius, including bedrock milling features spread across numerous boulders with slicks of various sizes, reflecting intensive food processing activity. The historic-era features consist of a house foundation, shed, rock retaining walls, trash scatters, and remnants of an old road—all likely associated with the late 19th-century Webbe homestead. Together, these features represent long-term occupation and multiphase land use within the Box Springs Canyon area.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Pedestrian Survey Results

The pedestrian survey of the 7.49-acre parcel in Moreno Valley yielded a negative result for cultural resources. No archaeological features, artifacts, or midden soil indicative of prehistoric or historic occupation were observed during systematic transect coverage at 5-meter intervals. A single metal pipe was identified near the center of the parcel (33.94737, -117.29362), measuring 8 5/16 inches in diameter and rising 9 7/16 inches above ground surface. While the pipe exhibited surface weathering and rust consistent with long-term exposure, it lacked diagnostic characteristics, such as manufacturer's marks, fittings, or construction context, that would suggest historic significance under CEQA or NRHP criteria. Based on its condition, dimensions, and lack of associated features or stratigraphy, the pipe is interpreted as a remnant of relatively modern infrastructure, possibly related to post-1970s land development or agricultural irrigation. It is not considered a historical resource.

Sacred Lands File Results

A request for a Sacred Lands File (SLF) search of the project area and 1-mile buffer has been submitted to the Native American Heritage Commission (NAHC). A response from the NAHC is currently pending.

Conclusion

Based on the Cultural Resources Assessment, no prehistoric or historic-era cultural materials, features, or structures were identified within the project area. Although a metal pipe was observed during the pedestrian survey, it does not meet the criteria for historic significance. **Therefore, a less than significant impact relative to historical resources would occur.**

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐

Response: Less than Significant Impact with Mitigation Incorporated. Based on the Cultural Resources Assessment, prehistoric and historic-period archaeological sensitivity is low. There are no reliable sources of natural surface water within close proximity to the project. Ethnographic documentation indicates that the project area is within Cahuilla and Luiseño territory but identified no villages or place names within or adjacent to the project area itself. In addition, the project site has been previously disturbed by 20th-century ranching, railroad infrastructure, and agricultural development. As a result of the Cultural Resources Assessment, the project site has been thoroughly surveyed, and no surface indications of sites, including bedrock milling features that may indicate the presence of subsurface archaeological deposits, were observed.

The project site is highly disturbed and unlikely to yield any significant buried archaeological resources. Nonetheless, there is a potential for disturbing previously unknown archaeological resources during excavation into native soil. **As such, in accordance with the Cultural Resources Assessment, potential impacts would be less than significant through the implementation of Mitigation Measure TCR-6 below, which requires that, in the event of unanticipated subsurface discoveries, all work within 100 feet shall be halted until a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal Representatives, and all site monitors can evaluate the findings with the City and make recommendations.**

c) Disturb any human remains, including those interred outside of formally dedicated	☐	☒	☐	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
cemeteries?				

Response: Less than Significant Impact with Mitigation Incorporated. No conditions exist that suggest human remains are likely to be found on the project site. However, construction activities, particularly grading, could potentially disturb human remains interred outside of a formal cemetery. Thus, the potential exists that human remains may be unearthed during grading and excavation activities associated with project construction. In the event that human remains are discovered during grading or other ground-disturbing activities associated with the proposed project, those remains shall receive proper treatment in accordance with State of California Health and Safety Code Sections 7050.5-7055, as described in **Mitigation Measure TCR-7** below. **Therefore, impacts would be reduced to a less than significant level with mitigation incorporated.**

MITIGATION MEASURES

TCR-6 **Inadvertent Finds.** If potential historic or cultural resources are uncovered during excavation or construction activities at Moreno Valley Farm Bureau (Tentative Tract Map 38955) that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, all ground-disturbing activities in the affected area within 100 feet of the uncovered resource must cease immediately and a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal Representatives, and all site monitors per the Mitigation Measures, shall be consulted by the City to evaluate the find, and as appropriate recommend alternative measures to avoid, minimize or mitigate negative effects on the historic, or prehistoric resource. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional archeologists and Tribal Monitors, if needed. Determinations and recommendations by the consultant shall be immediately submitted to the Planning Division for consideration and implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic.

TCR-7 **Human Remains.** If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the “most likely descendant”. The “most likely descendant” shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA). **No photographs are to be taken except by the coroner, with written approval by the consulting Tribe(s).**

SIGNIFICANCE OF IMPACT AFTER MITIGATION

Implementation of **Mitigation Measure TCR-6** would ensure that any archaeological resources inadvertently discovered during project grading or construction activities would be protected consistent with the recommendations of a qualified archaeologist, thereby reducing impacts to a less than significant level.

Implementation of **Mitigation Measure TCR-7** would ensure that any human remains inadvertently discovered during project grading or construction activities would be protected consistent with the investigation and recommendations of the County Coroner, thereby reducing impacts to a less than significant level.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.2 – Cultural and Historical Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.10 – Cultural Resources
     - Figure 5.10-1 – Locations of Listed Historic Resource Inventory Structures
     - Figure 5.10-2 – Location of Prehistoric Sites
     - Figure 5.10-3 – Paleontological Resource Sensitive Areas
   - Appendix F – Cultural Resources Analysis, Study of Historical and Archaeological Resources for the Revised General Plan, City of Moreno Valley, Archaeological Associates, August 2003.
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Title 7 – Cultural Preservation
5. Cultural Resources Inventory for the City of Moreno Valley, Riverside County, California, prepared by Daniel F. McCarthy, Archaeological Research Unit, University of California, Riverside, October 1987 (*This document cannot be provided to the public due to the inclusion of confidential information pursuant to Government Code Section 6254.10.*)

VI. ENERGY – Would the project:

The analysis and findings throughout this section are based on the *Air Quality, Greenhouse Gas, Health Risk Assessment, and Energy Impact Analysis Report* (Air Quality, Greenhouse Gas, HRA and Energy Report) prepared by Roma Environmental, dated January 23, 2025, provided as **Appendix 1** of this IS/MND.

REGULATORY FRAMEWORK

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the U.S. Department of Transportation, the U.S. Department of Energy, and the U.S. Environmental Protection Agency (USEPA) are three federal agencies with substantial influence over energy policies and programs. On the state level, the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) are two agencies with authority over different aspects of energy. Relevant federal and state energy-related laws and plans are summarized below.

Federal

Corporate Average Fuel Economy (CAFE) Standards

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.

Issued by NHTSA and EPA in March 2020 (published on April 30, 2020, and effective after June 29, 2020), the Safer Affordable Fuel-Efficient Vehicles Rule would maintain the CAFE and CO2 standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE and CO2 standards for model year 2020 are 43.7 mpg and 204 grams of CO2 per mile for passenger cars and 31.3 mpg and 284 grams of CO2 per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

On May 12, 2021, the NHTSA published a notice of proposed rulemaking in the Federal Register, proposing to repeal "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program," published Sept. 27, 2019 (SAFE I Rule), in which NHTSA codified regulatory text and made additional pronouncements regarding the preemption of state and local laws related to fuel economy standards. Specifically, this document proposed to fully repeal the regulatory text and appendices promulgated in the SAFE I Rule. In addition, this document proposed to repeal and withdraw the interpretative statements made by the Agency in the SAFE I Rule preamble, including those regarding the preemption of particular state Greenhouse Gas (GHG) Emissions standards or Zero Emissions Vehicle (ZEV) mandates. As such, this document proposed to establish a clean slate with respect to NHTSA's regulations and interpretations concerning preemption under the Energy Policy and Conservation Act (EPCA). This action is effective as of January 28, 2022.

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility as well as address national and local interests in air quality and energy. ISTEA contained factors that Metropolitan Planning Organizations (MPOs) were to address in developing transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values guiding transportation decisions.

State

California Building Energy Efficiency Standards (Title 24)

The 2022 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2023. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards.

California Green Building Standards

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2023. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed CALGreen in an effort to meet the State's landmark initiative Assembly Bill 32 (AB 32) goals, which established a comprehensive program of cost-effective reductions of greenhouse gas (GHG) emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.

Senate Bill 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December

31, 2030; and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), State board or the CARB, and all other State agencies to incorporate the policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and CARB to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the Legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of SB 100.

Assembly Bill 1493/Pavley Regulations

California Assembly Bill 1493 enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2005, the CARB submitted a "waiver" request to the EPA from a portion of the federal Clean Air Act in order to allow the State to set more stringent tailpipe emission standards for CO2 and other GHG emissions from passenger vehicles and light duty trucks. On December 19, 2007, the EPA announced that it denied the "waiver" request. On January 21, 2009, CARB submitted a letter to the EPA administrator regarding the State's request to reconsider the waiver denial. The EPA approved the waiver on June 30, 2009.

California Energy Commission Integrated Energy Policy Report

Senate Bill 1389 requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The CEC prepares these assessments and associated policy recommendations every two years, with updates in alternate years, as part of the Integrated Energy Policy Report.

The 2022 Integrated Energy Policy Report (2022 IEPR) was adopted in February 28, 2023. The 2022 IEPR provides updates on a variety of energy issues facing California. These issues will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. The 2022 IEPR also discusses the California Energy Commission's equity and environmental justice efforts, its development of a more easily navigable online data platform via the California Energy Planning Library, and an update to the California Energy Demand Forecast. The report also provides information on emerging topics related to energy reliability, western electricity integration, hydrogen, gasoline prices, gas transition, and distributed energy resources.[8]

The 2023 Integrated Energy Policy Report (2023 IEPR) was completed in January 2024. The 2023 IEPR discusses speeding connection of clean resources to the electricity grid, the potential use of clean and renewable hydrogen, and the California Energy Demand Forecast to 2040. The report also provides updates on topics such as gas decarbonization, energy efficiency, the Clean Transportation Program, Assembly Bill 1257 (Bocanegra, Chapter 749, Statutes of 2013), and publicly owned utilities' progress toward peak demand reserves and margins.[9]

Local

City of Moreno Valley General Plan

Both the 2006 and 2040 General Plans contain applicable energy related goals and policies, which are shown below:

2006 General Plan

Goal 2.5: Maintenance of systems for water supply and distribution; wastewater collection, treatment, and disposal; solid waste collection and disposal; and energy distribution which are capable of meeting the present and future needs of all residential, commercial, and industrial customers within the City of Moreno Valley.

> Policy 2.2.15: Encourage the use of innovative and cost effective building materials, site design practices and energy and water conservation measures to conserve resources and reduce the cost of residential development.

Objective 6.7: Reduce mobile and stationary source air pollutant emissions.

Policy 6.7.6: Require building construction to comply with the energy conservation requirements of Title 24 of the California Administrative Code.

Objective 7.5: Encourage efficient use of energy resources.

Policies:

7.5.1: Encourage building, site design, and landscaping techniques that provide passive heating and cooling to reduce energy demand.

7.5.2: Encourage energy efficient modes of transportation and fixed facilities, including transit, bicycle, equestrian, and pedestrian transportation. Emphasize fuel efficiency in the acquisition and use of City-owned vehicles.

7.5.4 Encourage efficient energy usage in all city public buildings.

7.5.5 Encourage the use of solar power and other renewable energy systems.

2040 General Plan

Goal OSRC-3: Use energy and water wisely and promote reduced consumption.

Policies:

OSRC 3.1: Promote energy conservation throughout the community and encourage the use of renewable energy systems and technologies to supplement or replace traditional building energy systems.

OSRC 3.5: Promote the retention and reuse of rainwater onsite and promote the use of rain barrels or other rainwater reuse systems throughout the community.

OSRC 3.6: Encourage new development to incorporate as many water-wise practices as feasible in their design and construction.

OSRC 3.8: Conserve water through the planting and maintenance of trees, which will provide for the capture of precipitation and runoff to recharge groundwater, in addition to providing shading for other landscaping to reduce irrigation requirements. Ensure that any 'community greening' projects utilize water-efficient landscape.

CEQA GUIDELINES APPENDIX F

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F states that the means of achieving the goal of energy conservation includes the following:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
- Increasing reliance on renewable energy sources.

[8] California Energy Commission. Final 2022 Integrated Energy Policy Report Update. February 2023. Final 2022 Integrated Energy Policy Report Update_with_Errata Accessed February 18, 2025.

[9] California Energy Commission. Final 2023 Integrated Energy Policy Report. January 2024. TN254463_20240214T142545_Adopted 2023 Integrated Energy Policy Report with Errata.pdf Accessed February 18, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Response: Less than Significant Impact.

PROJECT-RELATED SOURCES OF ENERGY CONSUMPTION

Information from the CalEEMod 2022.1.1.29 outputs utilized for the air quality and GHG analyses in the Air Quality, Greenhouse Gas, HRA and Energy Report, were also utilized for the project's energy analysis. The CalEEMod outputs detail project-related construction equipment, transportation energy demands, and facility energy demands.

CONSTRUCTION-RELATED ENERGY CONSUMPTION

Construction Equipment Electricity Usage Estimates

As stated previously, electrical service would be provided to the project site by SCE. The focus within this section is the energy implications of the construction process, specifically the power cost from on-site electricity consumption during construction of the proposed project. Based on the 2021 National Construction Estimator, Richard Pray (2021)[10], the typical power cost per 1,000 square feet of building construction per month is estimated to be $2.37. The project plans to develop the site with approximately 205,550 square feet of multi-family residential uses over the course of approximately 20 months. Based on ***Table 5, Project Construction Power Cost and Electricity Usage***, the total power cost of the on-site electricity usage during the construction of the proposed project is estimated to be approximately $9,743.07. As shown in ***Table 5***, the total electricity usage from project construction related activities is estimated to be approximately 47,830 kilowatt hours (kWh).[11]

Table 5: Project Construction Power Cost and Electricity Usage

Power Cost (per 1,000 square foot of building per month of construction)	Total Building Size (1,000 Square Foot)	Construction Duration (months)	Total Project Construction Power Cost
$2.37	205.550	20	$9,743.07
Cost per kWh	Total Project Construction Electricity Usage (kWh)		
$0.20	47,830		

Source: Roma Environmental, *Air Quality, Greenhouse Gas, Health Risk Assessment, and Energy Impact Analysis Report,* January 23, 2025, Table 21.

Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of project construction. Using the CalEEMod data input for the air quality and GHG analyses, the project's construction phase would consume electricity and fossil fuels as a single energy demand, that is, once

[10] Pray, Richard. 2021 National Construction Estimator. Carlsbad: Craftsman Book Company, 2021.

[11] Assumes the project will be under the Residential Rate - Schedule D under SCE. Rate is from the effective date as of October 1, 2024 from https://www.sce.com/regulatory/tariff-books/rates-pricing-choices.

construction is completed their use would cease. CARB's Emissions Factors (EMFAC) tables show that on average aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr-gal. Based on this calculation, project construction activities would consume an estimated total of 48,888 gallons of diesel fuel.

Construction Worker Fuel Estimates

It is assumed that construction worker trips are from light duty autos (LDA), light duty truck 1 (LDT1), and light duty truck 2 (LDT2) at a mix of 25 percent/50 percent/25 percent, respectively, along area roadways.[12] With respect to estimated vehicle miles traveled (VMT), the construction worker trips would generate an estimated 779,622 VMT. Data regarding project related construction worker trips were based on CalEEMod 2022.1.1.29 model defaults.

Vehicle fuel efficiencies for construction workers were estimated in the air quality and GHG analyses using information generated using CARB's EMFAC 2021 model. An aggregate fuel efficiency of 26.59 miles per gallon (mpg) was used to calculate vehicle miles traveled for construction worker trips. Based on this calculation, an estimated total of 29,326 gallons of fuel would be consumed for construction worker trips.

Construction Vendor/Hauling Fuel Estimates

Data regarding project-related construction worker trips were based on CalEEMod 2022.1.1.29 model defaults and was used to estimate the fuel consumption for vendor and hauling during grading and building construction. With respect to estimated VMT, the vendor and hauling trips would generate an estimated 75,569 VMT. For the architectural coatings, it is assumed that the contractors would be responsible for bringing coatings and equipment with them in their light duty vehicles. Vendors delivering construction material or hauling debris from the site during grading and building construction would use medium- to heavy-duty vehicles with an average fuel consumption of 7.14 mpg for medium trucks and 6.15 mpg for heavy duty trucks.[13] Based on this calculation, an estimated 10,960 gallons of fuel would be consumed for vendor trips and haul trips.

Conclusion

Construction equipment used over the approximately 20-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

The project would utilize construction contractors which practice compliance with applicable CARB regulation regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. Compliance with these measures would result in a more efficient use of construction-related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines

[12] CalEEMod User's Guide Appendix C (April 2022) states that construction work trips are made by a fleet consisting of 25 percent light-duty auto (or passenger car), 50 percent light-duty truck type 1 (LDT1), and 25 percent light duty truck type 2 (LDT2).

[13] CalEEMod User's Guide Appendix C (April 2022) states that vendor trips are made by a fleet consisting of 50 percent medium trucks (MHDT) and 50 percent heavy trucks (HHDT) and that hauling and onsite truck trips are made by a fleet consisting of 100 percent HHDT.

and equipment would result in less fuel combustion and energy consumption.

Additionally, as required by California Code of Regulations Title 13, Motor Vehicles, Section 2449(d)(3), Idling, limits idling times of construction vehicles to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints.

Therefore, since the project's construction is required to comply with CARB regulations and does not include the need for construction processes that would require the use of equipment that is more energy efficient, the proposed project annual construction-related fuel consumption would not be considered significant. A less than significant impact would occur.

OPERATIONAL ENERGY CONSUMPTION

Transportation Fuel Consumption

Operational related fuel consumption was calculated using the annual VMT from the CalEEMod output from the air quality and GHG analyses and using information generated using CARB's 2021 EMFAC model. Based on this calculation, an estimated 134,473 gallons of gasoline and 57,675 gallons of diesel fuel would be consumed per year for the operation of the proposed project.

Trip generation and VMT generated by the proposed project are consistent with other similar commercial uses of similar scale and configuration as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). That is, the proposed project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. Furthermore, the state of California consumed approximately 3.5 billion gallons of diesel and 13.6 billion gallons of gasoline in 2023.[14] The increase in fuel consumption from the proposed project is insignificant in comparison to the State's demand. Therefore, project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary and impacts would be less than significant.

Facility Energy Demands (Electricity and Natural Gas)

Building operation and site maintenance (including landscape maintenance) would result in the consumption of electricity (provided by SCE) and natural gas (provided by SoCalGas). The annual natural gas and electricity demands were provided per the CalEEMod output from the air quality and GHG analyses. The estimated electricity demand for the proposed project is approximately 0 kWh per year because the project site would employ the design feature of installing solar panels to achieve net zero. In 2022, the non-residential sector of the County of Riverside consumed approximately 8,720 million kWh of electricity.[15] In addition, the estimated natural gas consumption for the proposed project is approximately 8,392,442 kBTU per year. In 2022, the non-residential sector of the County of Riverside consumed approximately 147 million therms of natural gas.[16] Therefore, the increase in both electricity and natural gas demand from the proposed project is insignificant compared to the County's 2022 non-residential sector demand.

[14] California Energy Commission. California Gasoline Data, Facts and Statistics. California Gasoline Data, Facts, and Statistics Accessed February 18, 2025.

[15] California Energy Commission, Electricity Consumption by County. https://ecdms.energy.ca.gov/elecbycounty.aspx Accessed February 18, 2025.

[16] California Energy Commission, Gas Consumption by County. http://ecdms.energy.ca.gov/gasbycounty.aspx Accessed February 18, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, the California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or "plug-in" energy use can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.). The proposed project would be required to comply with Title 24 standards. Furthermore, the proposed project energy demands in total would be comparable to other residential projects of similar scale and configuration. Therefore, the project facilities' energy demands, and energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. **A less than significant impact would occur**.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Response: Less than Significant Impact. Regarding federal transportation regulations, the project site is located in an already developed area. Access to and from the project site is from existing roads. These roads are already in place so the project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by SCE.

Regarding Pavley (AB 1493) regulations, an individual project does not have the ability to comply or conflict with these regulations because they are intended for agencies and their adoption of procedures and protocols for reporting and certifying GHG emission reductions from mobile sources. However, the vehicles associated with the proposed project would be required to comply with federal and state fuel efficiency standards.

Regarding the State's Renewable Energy Portfolio Standards, the project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CALGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.

As the City of Moreno Valley CAP and General Plan are in the midst of a legal challenge, the project and its GHG emissions were compared to the draft SCAQMD GHG emissions threshold for all land uses and the Riverside County CAP. The Riverside County CAP Update includes GHG reduction measures that focus on different sectors including transportation, energy efficiency, clean energy, water efficiency, advanced measures, and solid waste. The Riverside County CAP states that projects that do not exceed the CAP's screening threshold of 3,000 MTCO2e per year are considered to have less than significant GHG emissions and are in compliance with the County's CAP Update. As discussed in Section 4.8, *Greenhouse Gas Emissions*, of this IS/MND, the proposed project would be consistent with the applicable goals of the Riverside County CAP.

Therefore, the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

MITIGATION MEASURES

None required.

Sources:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. Moreno Valley General Plan, adopted July 11, 2006 • Chapter 7 – Conservation Element – Section 7.6 – Energy Resources 2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006 3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code				
VII. GEOLOGY AND SOILS – Would the project:				
The analysis and findings throughout this section are based on the following report and technical study: • *Due Diligence Geotechnical Evaluation and Infiltration Feasibility Testing*, prepared by GeoSoil, Inc., dated November 9, 2025, and as provided as Appendix 4A of this IS/MND • *Web Soils Survey*=derived from the Natural Resources Conservation Service (NRCS), dated January 14, 2025, and provided as **Appendix 4B** of this IS/MND.				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf	☐	☐	☒	☐
Response: Less than Significant Impact. According to the Geotechnical Evaluation, there are no known active faults traversing the site. The project site is also not located in an Earthquake Fault Zone as mapped by the California Geological Survey.[17] The closest mapped active fault that could affect the project site is the Claremont fault, which is located approximately 5.7 miles to the northeast. Therefore, the potential for fault rupture at the site is considered low. Although no active faults traverse the project site, as a condition of issuance of building and grading permits, the project would be required to comply with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act, as well as with the 2022 California Building Code (CBC), which includes specific design measures intended to maximize structural stability in the event of an earthquake. Construction of the project would also be required to comply with current seismic design parameters and all other recommendations as contained in the project-specific Geotechnical Evaluation to ensure structural integrity in the event of an earthquake. **Impacts would be less than significant.**				
ii) Strong seismic ground shaking?	☐	☐	☒	☐
Response: Less than Significant Impact. The project site is located in seismically active Southern California with numerous fault systems in the region. As such, it should be anticipated that the project site will experience moderate to strong ground shaking in the near future. However, as a condition of issuance				

[17] California Geological Survey *Earthquake Zones of Required Investigation* interactive web map. https://maps.conservation.ca.gov/cgs/EQZApp/ Accessed February 13, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
of grading and building permits, the project would be required to comply with current CBC seismic design parameters and all other recommendations as contained in the project-specific Geotechnical Evaluation. Compliance with these parameters would require proposed residential homes to be designed and constructed to withstand expected seismic activity and associated potential hazards, thereby minimizing risk to the public and property. The project would be designed and developed consistent with the CBC and standard engineering practices and reviewed in conjunction with the City Engineer. **Therefore, impacts would be less than significant.**				
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
Response: Less than Significant Impact. *Liquefaction* Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine-to-medium grained, cohesionless soils. As the shaking action of an earthquake progresses, the soil grains are rearranged, and the soil densifies within a short period of time. Rapid densification of the soil results in a buildup of pore-water pressure. When the pore-water pressure approaches the total overburden pressure, the soil reduces greatly in strength and temporarily behaves similarly to a fluid. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations. The Riverside County *Map My County* GIS interactive mapping website has mapped the project site as having a low and very low liquefaction potential.[18] In addition, standard grading and soil engineering practices would serve to ensure that project structures are adequately supported, and render the likelihood of liquefaction or liquefaction-related phenomena to very low levels. **Therefore, impacts relative to seismic-related ground failure including liquefaction would be less than significant.**				
iv) Landslides?	☐	☐	☐	☒
Response: No Impact. The proposed project is not expected to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death from landslides. Although the project site is in an area of high seismic activity, because of the relatively flat terrain on the site and the surrounding properties, the site is at little risk for landslides. **No impact would occur.**				
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
Response: Less than Significant Impact. Proposed construction activities would include clearing the site of debris and/or vegetation, soil excavation, grading, asphalt paving, residential home building construction, and landscaping. Such activities would disturb site soils, exposing them to the erosive effects of wind and water. However, all construction activities related to the proposed project would be subject to implementation of BMPs for erosion control, as required under National Pollutant Discharge Elimination System (NPDES) regulations pursuant to the federal Clean Water Act. NPDES requirements for construction projects of one acre or more in area are set forth in the Construction General Permit issued by the State Water Resources Control Board (State Water Board Order No. 2009-0009-DWQ). Furthermore, the project's land clearing, grading, and construction activities would be required to comply with SCAQMD Rules 403 and 403.2 regulating fugitive dust emissions, thus minimizing wind erosion from such ground-				

18 Riverside County Map My County GIS interactive mapping website. https://gis1.countyofriverside.us/Html5Viewer/index.html?viewer=MMC_Public Accessed February 13, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
disturbing activities. Therefore, the proposed project would not generate substantial erosion. **Soil erosion impacts would be less than significant**.				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
Response: Less than Significant Impact. According to the NRCS Soils Report for the project area, the project site is underlain by the following soil units: Fallbrook fine sandy loam, shallow, 8 to 15 percent slopes eroded (FkD2), Hanford coarse sandy loam, 2 to 8 percent slopes (HcC), Monserate sandy loam, 5 to 8 percent slopes, eroded (MmC2), and Monserate sandy loam, shallow, 5 to 15 percent slopes, eroded (MnD2). Based on information in the Soils Report, lateral spreading is unlikely considering the near level of existing grades and the fact that the project site and vicinity is characterized by flat relief. The risk for subsidence or settlement at the site is considered low because the soils within the project site are not of a clay type, and as such are not particularly susceptible to subsidence. In addition, as discussed in Impacts 7a)iii and 7a)iv, above, there is a low liquefaction and landslide potential and flat topography onsite. As such, the project site is not considered to be located on a geologic unit or soil that is unstable or could become unstable as a result of the project. **A less than significant impact would occur.**				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
Response: Less than Significant Impact. Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements. As discussed above, soils in the project area consist of Fallbrook fine sandly loam, Hanford coarse sandy loam, and Monserate sandy loam. Expansive soils are generally of a clay type soil, not a sandy soil such as the fine sand series soils that underlay the project site. Compliance with the 2022 CBC is sufficient to ensure that the proposed structures would conform to the underlying soils and thereby be constructed safely as habitable structures. Thus, based on the absence of clay-type soils on site, the proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. **Impacts regarding expansive soils would be less than significant.**				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
Response: No Impact. The proposed project would be served by the municipal sewer system of the Eastern Municipal Water District (EMWD) and would therefore have no need for a septic system or other alternative wastewater disposal system. **There would be no impact.**				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
Response: Less than Significant Impact with Mitigation Incorporated. Regionally, the project site lies within the northern part of the Perris Block, a structural block bounded on the west by the Elsinore fault				

zone and on the east by the San Jacinto fault zone. The bedrock unit at the project is mapped as Cretaceous-aged crystalline rocks, namely, tonalite. Outcrops of tonalite at the project site are partly overlain by early Pleistocene-aged very old, sandy alluvial fan deposits. These deposits are characterized as well-dissected, well-indurated, reddish-brown sands. Also mapped overlying the tonalite are "unnamed late Cenozoic sedimentary rocks in Riverside and Corona areas," which are isolated deposits of early Pleistocene to late Pliocene-aged, lithologically diverse, moderately indurated, coarse-grained sandstone, pebbly sandstone, and conglomerate. These deposits are restricted to two small areas near the southeast end of Box Springs Canyon.

The fossilized remains of Pleistocene-aged mammals are known to occur within Pleistocene alluvial fan deposits in the Moreno Valley city limits. In addition, the Riverside County *Map My County* GIS interactive mapping website has mapped the project site as having a high paleontological sensitivity (High B). Therefore, the Archaeological and Paleontological Resources Due Diligence Report prepared for the project has recommended that the project incorporate Mitigation Measure PAL-1 from the General Plan 2040 Draft Environmental Impact Report (DEIR), as the DEIR acknowledges that significant impacts to paleontological resources could potentially occur as a result of development within the city limits. Therefore, the project would implement **Mitigation Measure GEO-1**, adapted from DEIR Mitigation Measure PAL-1, which requires new development projects to comply with mitigation framework described in the measure. A qualified paleontological monitor would be required to be present during grading in project areas where a project-specific geological technical study has determined that such monitoring is necessary due to the potential for paleontological resources to reside within the underlying geologic formations. **With implementation of Mitigation Measure GEO-1, potential impacts to undiscovered paleontological resources would be reduced to a less than significant level.**

MITIGATION MEASURES

GEO-1 Applications for future development, wherein the Community Development Director or his or her designee has determined a potential for impacts to paleontological resources, shall review the underlying geology and paleontological sensitivity of the site. If it is determined that the potential exists that sensitive paleontological resources are present, the applicant shall be required to comply with the following mitigation framework. A qualified paleontological monitor shall be present during grading in project areas where a project specific geological technical study has determined that such monitoring is necessary due to the potential for paleontological resources to reside within the underlying geologic formations. The geologic technical study shall also provide specific duties of the monitor, and detailed measures to address fossil remains, if found.

SIGNIFICANCE OF IMPACT AFTER MITIGATION

With implementation of **Mitigation Measure GEO-1**, as well as adherence to the standard conditions and requirements, potential impacts regarding geology and soils (paleontological resources) would be reduced to a less than significant level.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.5 – Geologic Hazards
     - Figure 6-3 – Geologic Faults & Liquefaction
   - Chapter 7 – Conservation Element – Section 7.4 -- Soils
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.6 – Geology and Soils
     - Figure 5.6-1 – Geology

- Figure 5.6-2 – Seismic Hazards

3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations
5. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, amended 2017, http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf
   - Chapter 4 – Earthquake
     - Figure 4-1 – Right-Lateral Strike -Slip Fault
     - Figure 4-1.1 – Moreno Valley Geologic Faults and Liquefaction 2016
     - Figure 4-1.2 – Moreno Valley Area Ground Shaking Map
   - Chapter 8 – Landslide
     - Figure 8-1 – Moreno Valley Slope Analysis 2016
6. Emergency Operations Plan, City of Moreno Valley, March 2009, http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf
   - Threat Assessment 1 – Major Earthquakes
     - Figure 9 – Types of Faults
     - Figure 10 – Earthquake Faults
     - Figure 11 – Comparison of Richter Magnitude and Modified Mercalli Intensity
     - Figure 12 – Magnitude 4.5 or Greater Earthquake Map
     - Figure 13 – Geologic Faults and Liquefaction

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

The analysis and findings throughout this section are based on the *Air Quality, Greenhouse Gas, Health Risk Assessment, and Energy Impact Analysis Report* (Air Quality, Greenhouse Gas, HRA and Energy Report) prepared by Roma Environmental, dated January 23, 2025, provided as **Appendix 1** of this IS/MND.

DISCUSSION

Background

Global Climate Change

California is a substantial contributor of global GHGs. In 2020, emissions from GHG emitting activities statewide were 369.2 million metric tons of carbon dioxide (CO2) equivalent (MMTCO2e), 35.3 MMTCO2e lower than 2019 levels and 61.8 MMTCO2e below the 2020 GHG Limit of 431 MMTCO2e.[19] Climate studies indicate that California is likely to see an increase of three to four degrees Fahrenheit over the next century. Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which is to increase the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750), to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present,

[19] California Environmental Protection Agency, *California Greenhouse Gas Emissions for 2000 to 2020*, https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf, accessed February 19, 2025.

global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of January 2023, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 419 ppm.[20]

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm carbon dioxide equivalent (CO_2e)[21] concentration is required to keep global mean warming below 2 degrees Celsius (°C), which in turn is assumed to be necessary to avoid dangerous climate change.

Regulatory Framework

Various Statewide and local initiatives to reduce the State's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

State

Assembly Bill 32 (California Global Warming Solutions Act of 2006)

California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500-38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 (Pavley Bill) should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Senate Bill 375

Senate Bill (SB) 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities' strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPOs regional transportation plan. CARB, in consultation with MPOs, is required to provide each affected region with GHG reduction targets emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets are to be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects may not be eligible for funding.

Executive Order S-3-05

Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be

20 Scripps Institution of Oceanography, Carbon Dioxide *Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed February 19, 2025.

21 Carbon Dioxide Equivalent (CO2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The Executive Order directed the California Environmental Protection Agency (CalEPA) Secretary to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary is required to submit biannual reports to the Governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with Executive Order S-3-05, the CalEPA Secretary created the California Climate Action Team, made up of members from various State agencies and commissions. The Climate Action Team released its first report in March 2006, which proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through State incentive and regulatory programs.

Title 24, Part 6

The California Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6 of the California Code of Regulations (CCR) and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Part 6 of Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards was adopted in August 2021. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, would be required to comply with the 2022 Title 24.

Title 24, Part 11

The California Green Building Standards Code (CCR Title 24, Part 11), commonly referred to as CALGreen, is a Statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in five green building topical areas. The current version of the CALGreen Code went into effect on January 1, 2023. Buildings whose permit applications are applied for on or after January 1, 2023, would be required to comply with the 2022 CALGreen Code.

Senate Bill 32

Signed into law on September 2016, Senate Bill 32 (SB 32) codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). SB 32 authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

CARB Scoping Plan

On December 11, 2008, CARB adopted its Scoping Plan, which functions as a roadmap to achieve the California GHG reductions required by AB 32 through subsequently enacted regulations. CARB's Scoping Plan contains the main strategies California would implement to reduce the projected 2020 "Business-as-Usual" (BAU) emissions to 1990 levels, as required by AB 32. These strategies are intended to reduce carbon dioxide equivalent (CO_2e) emissions by 174 million metric tons. This reduction of 42 million metric tons carbon dioxide equivalent ($MTCO_2e$), or almost ten percent from 2002 to 2004 average emissions,

would be required despite the population and economic growth forecasted through 2020. CARB's Scoping Plan calculates 2020 BAU emissions as those expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. When CARB's Scoping Plan process was initiated, 2004 was the most recent year for which actual data was available. The measures described in CARB's Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The Scoping Plan update also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term Statewide emission limit will ensure that the State stays on course to meet our long-term goal." On January 20, 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. The 2017 Scoping Plan Update establishes a new Statewide emissions limit of 260 million $MTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

On December 15, 2022, CARB released the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), which identifies the strategies achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan contains the GHG reductions, technology, and clean energy mandated by statutes. The 2022 Scoping Plan was developed to achieve carbon neutrality by 2045 through a substantial reduction in fossil fuel dependence, while at the same time increasing deployment of efficient non-combustion technologies and distribution of clean energy. The plan would also reduce emissions of short-lived climate pollutants (SLCPs) and would include mechanical CO_2 capture and sequestration actions, as well as emissions and sequestration from natural and working lands and nature-based strategies. Under the 2022 Scoping Plan, by 2045, California aims to cut GHG emissions by 85 percent below 1990 levels, reduce smog-forming air pollution by 71 percent, reduce the demand for liquid petroleum by 94 percent compared to current usage, improve health and welfare, and create millions of new jobs. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan.

Regional

South Coast Air Quality Management District

SCAQMD Regulation XXVII, Climate Change

SCAQMD Regulation XXVII currently includes three rules:

- The purpose of Rule 2700 is to define terms and post global warming potentials.
- The purpose of Rule 2701, SoCal Climate Solutions Exchange, is to establish a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the SCAQMD.
- Rule 2702, Greenhouse Gas Reduction Program, was adopted on February 6, 2009. The purpose of this rule is to create a Greenhouse Gas Reduction Program for GHG emission reductions in the SCAQMD. The SCAQMD will fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

A variety of agencies have developed GHG emission thresholds and/or have made recommendations for how to identify a threshold. However, the thresholds for projects in the jurisdiction of the SCAQMD remain

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

in flux. The California Air Pollution Control Officers Association explored a variety of threshold approaches, but did not recommend one approach. The CARB recommended approaches for setting interim significance thresholds, in which a draft industrial project threshold suggests that non-transportation related emissions under 7,000 MTCO2e per year would be less than significant; however, the CARB has not approved those thresholds and has not published anything since then. The SCAQMD is in the process of developing thresholds.

Local

Riverside County Climate Action Plan

As stated above, a lawsuit entitled Sierra Club v. The City of Moreno Valley, Riverside Superior Court Case No. CVRI2103300, challenged the validity of the 2040 General Plan, the CAP, and the EIR. In June 2024, the City Council set aside the 2021 approvals and certification, based on a May 2024 ruling and judgment of the court. The City is in the process of readopting the 2040 General Plan, Municipal Code, Zoning, and CAP consistent with the court's decision and issued a Notice of Preparation of a Revised Environmental Impact Report for MoVal 2040: The Moreno Valley Comprehensive General Plan Update, Municipal Code and Zoning (including Zoning Atlas) Amendments, and CAP on July 30, 2024.

As the City's CAP is currently not valid, and the project is located in Moreno Valley, within the County of Riverside, the project and its GHG emissions have been compared to the goals of the County of Riverside CAP Update.

Per the County's CAP Update, the County adopted its first CAP in 2015 which set a target to reduce emissions back to 1990 levels by the year 2020 as recommended in the AB 32 Scoping Plan. Furthermore, the goals and supporting measures within the County's CAP Update are proposed to reflect and ensure compliance with changes in the local and State policies and regulations such as SB 32 and California's 2017 Climate Change Scoping Plan. Therefore, compliance with the County's CAP in turn reflects consistency with the goals of the CARB Scoping Plan, AB 32 and SB 32.

Threshold of Significance

To determine whether the project's GHG emissions are significant, this analysis uses the SCAQMD draft screening threshold of 3,000 MTCO2e per year for all land uses.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Response: Less than Significant Impact. The proposed project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water, and construction equipment. Area sources include emissions from consumer products, landscape equipment and architectural coatings. Energy usage includes emissions from the generation of electricity and natural gas used onsite; as stated previously, the project would provide enough solar power for the site to be net zero. Mobile sources include emissions from the additional vehicle miles generated from the project. Waste includes the GHG emissions generated from the processing of waste from the proposed project as well as the GHG emissions from the waste once it is interred into a landfill. Water includes the water used for the interior of the buildings, as well as for landscaping, and is based on the GHG emissions associated with the energy used to transport and filter the water. The construction related GHG emissions were also included in the analysis and were based on a 30-year amortization rate.

CalEEMod was used to calculate project-related GHG emissions. The project proposes to construct a 139-unit multi-family housing development with recreational amenities including a clubhouse, pool, and gym. Based on the City's average household size of 3.61, the 139 proposed residential units would generate up to 505 additional residents within the City. ***Table 6, Project-Related Greenhouse Gas Emissions***,

presents the estimated GHG emissions associated with the proposed project; refer to the Air Quality, Greenhouse Gas, HRA and Energy Report for CalEEMod outputs. As shown, the total greenhouse gas emissions for the proposed project (including the reduction in energy use for use of solar power) would be 1,637.33 MTCO2e per year. As such, the project's GHG emissions would not exceed the County's 3,000 MTCO2e/year threshold and therefore, would not generate GHG emissions that may have a significant impact on the environment. **This impact would be less than significant.**

Table 6: Project-Related Greenhouse Gas Emissions

Category	Greenhouse Gas Emissions (Metric Tons/Year)					
	Bio-CO2	NonBio-CO2	CO2	CH4	N2O	CO2e
Maximum Annual Operations	13.70	1,538.00	1,551.70	1.44	0.07	1,610.80
Construction[1]	0.00	29.73	29.73	0.00	0.00	30.07
Total Emissions	13.70	1,567.73	1,581.43	1.44	0.07	**1,637.33**

Source: Roma Environmental, *Air Quality, Greenhouse Gas, Health Risk Assessment, and Energy Impact Analysis Report,* January 23, 2025, Table 10.
Notes: 1 = Construction GHG emissions CO2e based on a 30-year amortization rate.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	☐	☐	☒	☐

Response: Less than Significant Impact. The proposed project would have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As stated above, the project and its GHG emissions have been compared to the goals of the County of Riverside CAP Update. According to the County's CAP Update, projects that do not exceed emissions of 3,000 MTCO2e per year are also required to include the following efficiency measures:

- Energy efficiency matching or exceeding the Title 24 requirements in effect as of January 2017, and
- Water conservation measures that match the California Green Building Code in effect as of January 2017.

At a level of 1,637.33 MTCO2e/year, the GHG emissions generated by the proposed project would not exceed the County of Riverside CAP Update screening threshold of 3,000 metric tons per year of CO2e. Therefore, as the project would comply with the goals of the County of Riverside CAP, the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. **This impact would be less than significant.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

4. California's 2017 Climate Change Scoping Plan, prepared by the California Air Resources Board, November 2017, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed April 24, 2019

IX.HAZARDS AND HAZARDOUS MATERIALS – Would the project:

The analysis and findings throughout this section are based on the *Phase I Environmental Site Assessment Report* (Phase I ESA) prepared by McAlister GeoScience, dated September 15, 2023, provided as **Appendix 5** of this IS/MND.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

Response: Less than Significant Impact. Exposure of the public or the environment to hazardous materials can occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, transmission fluid, etc.). These activities would be short-term, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. All project construction activities would demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. **Impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.**

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

Response: Less than Significant Impact.

CONSTRUCTION IMPACTS

During project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law. **Construction impacts in this regard would be less than significant.**

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
OPERATIONAL IMPACTS Hazardous materials are not typically associated with multi-family residential uses. Anticipated hazardous materials use may include minor cleaning products and the occasional use of pesticides and herbicides for landscape maintenance. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. As such, impacts concerning the significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would not occur with project implementation. **Therefore, potential hazardous materials impacts relative to operation of the project would be less than significant.**				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
Response: Less than Significant Impact. There is one existing school within one-quarter mile of the proposed project site; Seneca Elementary School located at 11615 Wordsworth Road, approximately 0.2-mile northwest of the project site. However, operation and maintenance of the proposed project would not produce hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Therefore, the proposed project would not result in impacts related to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **A less than significant impact would occur in this regard.**				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
Response: Less than Significant Impact. Existing and past land use activities are used as potential indicators of hazardous material storage and use. For example, many historic sites, historic and current, have soil or groundwater contamination as a result of spills of hazardous substances and petroleum products. Other hazardous materials sources include leaking underground storage tanks (LUSTs) in commercial and rural areas. Government Code Section 65962.5 requires the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB) to compile and update a regulatory sites listing (per the criteria of the Section). Based upon a review of the DTSC EnviroStor database,[22] no records of federal Superfund, State Response, Voluntary Cleanup, School Cleanup/Investigation, Military Evaluation, Corrective Action or Evaluation occur within one-half mile of the project site. In addition, based upon a review of the SWRCB GeoTracker database,[23] no records of Cleanup Program Sites, or Military Cleanup, Privatized, or UST Sites occur within one-half mile of the project site. There are two LUST Cleanup Sites identified approximately 0.35-mile northwest of the project site: Reliable Floats Factory and a Shell gas station. However, the GeoTracker				

[22] Department of Toxic Substances Control, EnviroStor website, https://www.envirostor.dtsc.ca.gov/public/ Accessed February 6, 2025.

[23] State Water Resources Control Board, GeoTracker website, GeoTracker Accessed February 6, 2025. Data prior to 2005 does not appear in GeoTracker.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

database documents that cleanup actions have occurred and both cases were closed in July 1997 and June 2012, respectively.

In addition, a Phase I ESA was prepared for the proposed project to assess any potential Recognized Environmental Conditions (RECs) that may exist in connection with the project site. An REC is defined by the American Society for Testing and Materials (ASTM) standard as the presence or likely presence of any hazardous substances or petroleum products in, on or at a property: 1) due to a release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment. This assessment includes the results of a literature review, a regulatory agency database review, and a site reconnaissance conducted on the project site.

According to the Phase I ESA, there were no RECs including historic or controlled RECs identified in connection with the project site. One de minimis condition was identified; specifically, the potential for hazardous building materials such as asbestos-containing materials (ACM) or lead-based paints (LBP) in the existing structures onsite, due to their construction and/or renovation dates.[24] As such, the Phase I ESA recommends that the Project Applicant prepare and implement an Operations and Maintenance Program Plan for ACM and LBP associated with demolition of the existing structures, to ensure the appropriate handling of suspect materials, which would be a standard condition of project approval. As such, no RECs exist onsite and no mitigation is required.

Based on the results of the hazardous materials investigations conducted for the project site, implementation of the project would not create a significant hazard to the public or the environment. **Therefore, a less than significant impact would occur in this regard.**

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

Response: Less than Significant Impact. The project site is not located within two miles of an airport. However, the nearest airport is the March Air Reserve Base/Inland Port located approximately 3.5 miles southeast of the project site, and the project is located within Compatibility Zone D of the Airport Influence Area boundary, as shown on Map MA-1, *Compatibility Map,* of the *March Air Reserve Base/Inland Port Land Use Compatibility Plan* (ALUCP).[25] Preliminary review of the project was conducted based on the criteria set forth in ALUC Section 1.5.3, Major Land Use Actions, (a)(4) (Proposed residential development, including land divisions, consisting of five or more dwelling units or lots), since the project proposes the development of 139 residential units within Compatibility Zone D.

According to the *Riverside County Airport Land Use Compatibility Plan Policy Document* (adopted October 2004), under Section 3.1.3., *Residential Development*, "the following criteria shall be applied to evaluation of the compatibility of proposed residential development:

> (b) Within Compatibility Zone D, local land use jurisdictions have two options. The basic option is to limit densities to no more than 0.2 dwelling units per acre. Additionally, a high-density option is provided. This option requires that densities be greater than 5.0 dwelling units per acre (i.e., an

[24] A de minimis condition is defined by the ASTM standard as a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

[25] Riverside County Airport Land Use Commission, March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, November 13, 2014.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
average parcel size less than 0.2 gross acres). See Table 3A for an explanation of the rationale behind these options." The density of the proposed project is 15 du/ac. As such, the development complies with the second option criteria of a density greater than 5.0 du/ac. Additionally, the residential development would not be of sufficient height to require modifications to the existing air traffic patterns at the airport and, therefore, would not affect aviation traffic levels or otherwise result in substantial aviation-related safety risks. Further, as identified in Table MA-2, *Basic Compatibility Criteria,* of the ALUP, the only prohibited uses in Compatibility Zone D are hazards to flight, including but not limited to tall objects and bird-attracting design features.[26] Project review and approval of the Riverside County Airport Land Use Commission (ALUC) is therefore not required. **Therefore, a less than significant impact would occur relative to airport safety hazards.**				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
Response: Less than Significant Impact. Activities associated with the project would not impede existing emergency response plans for the project site and/or other land uses in the project vicinity. The project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways. Furthermore, should partial lane closures be required as part of project construction activities, implementation of a traffic management plan would minimize congestion and ensure safe travel, including emergency access in the project vicinity. **Therefore, the impacts would be less than significant**.				
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
Response: No Impact. As discussed in Section 4.20, *Wildfire,* the project site is located in a moderately developed area surrounded by residential and commercial uses. Based upon the most recent California Department of Forestry and Fire Protection (CAL FIRE) map, the project site within a Local Responsibility Area (LRA), Very High Fire Hazard Severity Zone, High Fire Hazard Severity Zone and Moderate Fire Severity Zone. Urban levels of fire protection would be provided to the project area. In addition, the project would adhere to building codes and any conditions included through review by the Moreno Valley Fire Department (MVFD). The project buildings will also be constructed of ignition-resistant materials which are highly resistant to heat (Dudek 2025). **No impact would occur in this regard.** **MITIGATION MEASURES**				

[26] Hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land use development that may cause the attraction of birds to increase is also prohibited. Man-made features must be designed to avoid heightened attraction of birds. In Zones A, B1, and B2, flood control facilities should be designed to hold water for no more than 48 hours following a storm and be completely dry between storms (see FAA Advisory Circular 150/5200-33B). Additionally, certain farm crops and farming practices that tend to attract birds are strongly discouraged. These include: certain crops (e.g., rice, barley, oats, wheat – particularly durum – corn, sunflower, clover, berries, cherries, grapes, and apples); farming activities (e.g., tilling and harvesting); confined livestock operations (i.e., feedlots, dairy operations, hog or chicken production facilities, or egg-laying operations); and various farming practices (e.g., livestock feed, water, and manure). Fish production (i.e., catfish, trout) conducted outside of fully enclosed buildings may require mitigation measures (e.g., netting of outdoor ponds, providing covered structures) to prevent bird attraction. Also see Countywide Policy 4.3.7.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
None required				

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.2.8 – Wildland Urban Interface
   - Chapter 6 – Safety Element – Section 6.9 – Hazardous Materials
   - Chapter 6 – Safety Element – Section 6.10 – Air Crash Hazards
     - Figure 6-5 – Air Crash Hazards
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.5 – Hazards and Hazardous Materials
     - Figure 5.5-1 – Hazardous Materials Sites
     - Figure 5.5-2 – Floodplains and High Fire Hazard Areas
     - Figure 5.5-3 – City Areas Affected by Aircraft Hazard Zones
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. March Air Reserve Base (MARB)/March Inland Port (MIP) Airport Land Use Compatibility Plan (ALUCP) on November 13, 2014, (http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700)
5. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, amended 2017, http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf
   - Chapter 5 – Wildland and Urban Fires
     - Figure 5-2 – Moreno Valley High Fire Area Map 2016
   - Chapter 12 – Dam Failure/Inundation
     - Figure 12-2 Moreno Valley Evacuation Routes Map 2015
   - Chapter 13 – Pipeline
     - Figure 13-1 – Moreno Valley Pipeline Map 2016
   - Chapter 14 – Transportation
     - Figure 14-1.1 – Moreno Valley Air Crash Hazard Area Map 2016
   - Chapter 16 – Hazardous Materials Accident
     - Moreno Valley Hazardous Materials Site Locations Map 2016
6. Emergency Operations Plan, City of Moreno Valley, March 2009, http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf
   - Hazard Mitigation and Hazard Analysis
   - Threat Assessment 2 – Hazardous Materials
   - Threat Assessment 3 – Wildfire
   - Threat Assessment 6 – Transportation Emergencies
     - Figure 17 – Air Crash Hazards
7. *Fire Protection Plan*, prepared by Dudek, dated September 2025, and as provided as **Appendix 9** of this IS/MND.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X.HYDROLOGY AND WATER QUALITY – Would the project:				
The analysis and findings throughout this section are based on the following technical studies: ▪ *Hydrology Report for Tract No. 38955* (Hydrology Report), prepared by Adkan Engineers, dated October 8, 2024, provided as **Appendix 6A** of this IS/MND; and ▪ *Water Quality Management Plan* (WQMP Report), prepared by prepared by Adkan Engineers, dated October 2024, provided as **Appendix 6B** of this IS/MND.				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

Response: Less than Significant Impact. As part of Section 402 of the Clean Water Act, the USEPA has established regulations under the NPDES program to control direct stormwater discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The project site is located within the jurisdiction of the Santa Ana RWQCB.

Impacts related to water quality typically range over three different periods: 1) during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest; 2) following construction, prior to the establishment of ground cover, when the erosion potential may remain relatively high; and 3) following completion of the project, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Project construction could result in short-term impacts to water quality due to the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. These potential pollutants could damage downstream waterbodies. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the SWRCB's General Permit for Discharges of Stormwater Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ (Construction General Permit). The Construction General Permit requires the Project Applicant to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would specify BMPs to be used during project construction to minimize or avoid water pollution, thereby reducing potential short-term impacts to water quality. Upon completion of the project, the Project Applicant would be required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed.

To further minimize the potential for accidental release of pollutants during project construction, the routine transport, use, and disposal of construction materials would be required to adhere to applicable State and local standards and regulations for handling, storage, and disposal of hazardous substances; refer to Section 4.9, *Hazards and Hazardous Materials,* of this IS/MND. Compliance with such measures would prevent such substances from entering downstream water bodies via stormwater runoff and adversely affect existing water quality. Following conformance with the Construction General Permit, SWPPP, and implementation of BMPs, the project's short-term impacts to water quality and waste discharge requirements would be less than significant.

The project would be required to implement BMPs to minimize operational impacts to water quality. As

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
detailed in the project's *WQMP Report*, potential sources of runoff pollutants include landscaping/outdoor pesticide use, nutrients, oil and grease and runoff from impervious surfaces. As a result, the WQMP includes permanent and operational source control BMPs pursuant to the construction of on-site storm drain inlets, drain lines, a catch basin and BMP management of landscape planning, efficient irrigation, roof runoff controls, storm drain signage and private street sweeping. **With implementation of these BMPs, the project's impacts to water quality would be less than significant.**				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
Response: Less than Significant Impact. Project development would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management. The project site is not currently used for groundwater recharge purposes. Water for the project would be provided by EMWD and the project would connect to the existing water system. Thus, project implementation would not substantially decrease groundwater supplies nor interfere substantially with groundwater recharge. **Impacts would be less than significant in this regard.**				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
Response: Less than Significant Impact. According to the project's *WQMP Report*, approximately 293,174 SF of impervious surfaces would be created as a result of project development. Although the project would result in an increase in impervious surfaces, the proposed project overall would not substantially alter the existing drainage pattern of the site. In its current condition, the project site has two buildings with a parking lot area along Box Springs Road and the remaining site area is vacant and undeveloped. Half of the site drains to the northwest to an existing concrete-lined drainage channel and the southern half drains to the south towards Box Springs Road. As discussed in the project's *Hydrology Report***,** a new storm drain system would be built in accordance with the *City of Moreno Valley West End Area Drainage Plan*. In the developed condition, onsite low flow runoff from the proposed development would flow into four (4) onsite stormwater treatment areas (bioretention basins). Three of the bioretention basins would be located along the frontage of Box Springs Road and used for treatment of the onsite runoff. The fourth bioretention basin would be located at the northwest corner of the project site and would be used to mitigate the 2-year 24-hour storm event and treat the stormwater runoff prior to discharging to the existing drainage channel at the north end of the project site. Additional storage requirements would be met with the use of a 42-inch corrugated metal pipe (CMP) underground storage system to detain flows and outlet them slowly into the existing drainage channel. Development of the project site would reroute stormwater drainage from approximately two acres that previously drained to Box Springs Road and direct these flows to the basin at the northwest corner of the site. Proposed flows to the north would total 12.97 cubic feet per second (cfs) compared to the existing 9.35 cfs currently being directed north. Refer to ***Figure 6, WQMP BMP Map***. Based on the *Hydrology Report*, the existing drainage channel would have sufficient capacity to accept the proposed stormwater runoff from project development. As discussed in Response 4.10(a) above, the project would comply with the requirements of the Construction General Permit under the NPDES program, which would result in preparation of an SWPPP that outlines necessary BMPs to minimize erosion and water quality impacts during construction. **Therefore, project development would not result in significant erosion or siltation impacts due to changes in drainage patterns and impacts would be less than**				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
significant.				
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
Response: Less than Significant Impact. Refer to Responses 4.IV(b) and 4.X(c)(i) above. The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. **Impacts would be less than significant**.				
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
Response: Less than Significant Impact. Refer to Responses 4.X(c)(i), 4.X(c)(ii) and 4.X(c)(iii), above. On-site stormwater runoff associated with the project would be engineered to be conveyed through on-site infiltration to dispose of stormwater. Additionally, with the required implementation of a SWPPP and WQMP as discussed above, the proposed project would not generate a substantial source of polluted runoff. The project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems. **A less than significant impact would occur.**				
iv) Impede or redirect flood flows?	☐	☐	☒	☐
Response: Less than Significant Impact. The project site is relatively flat. The proposed project would include the development of a storm drainage system consistent with City requirements to convey stormwater runoff to the existing drainage channel at the north end of the project site. Implementation of stormwater management practices as required under Moreno Valley Municipal Code Chapter 8.10, *Stormwater/Urban Runoff Management and Discharge Controls,* would further reduce any impacts to a less than significant level. In addition, proposed on-site storm drain inlets, drain lines, catch basins, underground infiltration/retention chambers, front yard typical/onsite landscaping and streetscape landscaping to Box Springs Road would assist in minimizing the potential for impediment or redirect flood flows. **Therefore, this impact would be less than significant.**				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
Response: No Impact. Based on a review of the Federal Emergency Management Agency's (FEMA) National Flood Hazard Layer Viewer, the project site is located within Flood Insurance Rate Map (FIRM) Panel Number 06065C0733G.[27] Specifically, the project site is located in Zone X and described as an area of minimal flood hazard. Therefore, no impact would occur in this regard. The proposed project site is located approximately 40 miles inland from the Pacific Ocean. Due to this location, tsunamis are not considered a threat. No impact would occur in this regard. The nearest water body to the project site is Lake Perris located approximately 8.3 miles to the southeast. Therefore, because the proposed project is not adjacent to any marine or inland water bodies, impacts from				

[27] Federal Emergency Management Agency. n.d. National Flood Hazard Layer Viewer. https://www.fema.gov/national-flood-hazard-layer-nfhl. Accessed February 13, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
seiche are not expected to occur. **No impact would occur in this regard.**				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Response: Less than Significant Impact. The project site is located in the Santa Ana River Hydrologic Unit in the South Coast Hydrologic Region. The Santa Ana RWQCB oversees basin planning and water quality in the Santa Ana River Hydrologic Unit. The Santa Ana RWQCB prepares the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) to protect local surface waters and groundwater basins. The Basin Plan designates beneficial uses of waters in the region and provides objectives to maintain or improve water quality in the region.

The California Department of Water Resources (DWR) has initiated a technical process called Basin Prioritization, which utilizes the best available data and information to classify California's 515 groundwater basins into one of four categories high-, medium-, low-, or very low-priority, based on eight components that are identified in the California Water Code Section 10933(b). Each basin's priority determines which provisions of California Statewide Groundwater Elevation Monitoring (CASGEM) and the Sustainable Groundwater Management Act (SGMA) apply. SGMA requires medium- and high-priority basins to develop groundwater sustainability agencies (GSAs), develop groundwater sustainability plans (GSPs) and manage groundwater for long-term sustainability. Based on a search of the DWR's online SGMA Basin Prioritization Dashboard, the project site is located in a groundwater basin area (San Jacinto Groundwater Basin) designated as "high priority."[28]

While the San Jacinto Groundwater Basin is deemed a high priority basin, it is not deemed critically overdrafted, by DWR, and the Groundwater Sustainability Plan (GSP) is required to be developed by 2022 and implemented by 2042. The GSP will document basin conditions and basin management will be based on measurable objectives and minimum thresholds defined to prevent significant and unreasonable impacts to the sustainability indicators defined in the GSP.

As described in Response 4.10(c)(i) above, the project would install an underground infiltration/retention chamber to satisfy the requirements of the NPDES permit. Since the NPDES permit is intended to protect water quality, compliance with the permit would ensure that the project would not impair existing or potential beneficial uses of nearby or downstream water bodies and would not conflict with or obstruct implementation of the Basin Plan. The proposed project does not propose the drilling of a well to obtain groundwater for consumption. The project would not conflict with a groundwater management plan. **Impacts would be less than significant.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.7 – Water Quality
     - Figure 6-4 – Flood Hazards

[28] California Department of Water Resources SGMA Basin Prioritization Dashboard. Nd. https://gis.water.ca.gov/app/bp-dashboard/final/ Accessed February 13, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

- Chapter 7 – Conservation Element – Section 7.5 – Water Resources
  - Figure 7-1 Water Purveyor Service Area Map

2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.5 – Hazards and Hazardous Materials
     - Figure 5.5-2 – Floodplains and High Fire Hazard Areas
   - Section 5.7 – Hydrology and Water Quality
     - Figure 5.7-1 – Storm Water Flows and Major Drainage Facilities
     - Figure 5.7-2 – Groundwater Basins
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.080 – Liquid and Solid Waste
4. Moreno Valley Municipal Code Chapter 8.12 – Flood Damage Prevention
5. Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations
6. Eastern Municipal Water District (EMWD) Groundwater Reliability Plus, http://gwrplus.org/
7. Eastern Municipal Water District (EMWD) 2015 Urban Water Management Plan

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	☐	☐	☐	☒

Response: No Impact. The physical division of an established community is typically associated with construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area.

None of the proposed project components would constitute a barrier that would physically divide an established community. No new linear features are included in the project. Access to and movement throughout the project area and the City would not be physically impaired due to the project.

Therefore, the proposed project would not physically divide an established community and no impact would occur.

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

Response: Less than Significant Impact. As discussed above, the proposed project seeks to develop 139 multi-family residential units on the project site. The proposed project is already consistent with the existing land use designation of Residential/Office (R/O) and zoning designation of Multi-Family Residential (R15). As such, no change of land use or zoning would be required with project implementation and the project would be consistent with development standards required by the R/O and R15 land use and zoning designations. Furthermore, the project-level review of the project includes a site design review for compliance with site-specific development standards, as outlined in the Moreno Valley Municipal Code, Title 9, *Planning and Zoning*, and other applicable ordinances.

In addition, as discussed in Section 4.9, *Hazards and Hazardous Materials,* Impact (e), the project site is located within Compatibility Zone D of the *March Air Reserve Base/Inland Port Land Use Compatibility Plan*. The density of the proposed project is 15 du/ac. As such, the development complies with the second option residential development criteria of a density greater than 5.0 du/ac. Additionally, the residential development

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

would not be of sufficient height to require modifications to the existing air traffic patterns at the airport and, therefore, would not affect aviation traffic levels or otherwise result in substantial aviation-related safety risks. Although no explicit upper limit on usage intensity is defined for Zone D in the ALUP, the height of the project would not exceed 30 feet. Further, as identified in Table MA-2, *Basic Compatibility Criteria,* of the ALUP, the only prohibited uses in Compatibility Zone D are hazards to flight, including but not limited to tall objects and bird-attracting design features.

Therefore, the proposed project would not conflict with any land use plan, policy, or regulation, nor would it result in negative environmental effects as a result as evidenced by policy reviews assessed throughout this Initial Study. **Impacts would be less than significant.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.1 – Land Use
     - Figure 2-1 – Neighboring Lands Uses
     - Figure 2-2 – Land Use Map
   - Chapter 8 – 2014 – 2021 Housing Element
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.12 – Population and Housing
     - Attachments #1 - #10 – Housing Sites Inventory
     - Exhibits A1 – A11, C, D, and E – Maps of Housing Sites
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

Response: No Impact. According to the 2006 General Plan, the mineral resources known to be located within the City are common materials: sand, gravel and rock. Sand and gravel is used to make concrete and as road base. As of the 2006 General Plan, there was one active sand and gravel quarry on record within the City's sphere of influence: the Jack Rabbit Canyon, which was inactive as of 2001.

According to Figure 4.12-1, *Mineral Resource Zones*, of the City's 2040 General Plan EIR, the majority of the City, as well as the project site, is located within an area classified by the State Mining and Geology Board as Mineral Resource Zone 3 (MRZ-3), which are areas containing known or inferred mineral occurrences of undetermined mineral resource significance. However, as the site is surrounded by urbanized areas, any potential mining activities on the site would be limited by the surrounding land uses. In addition, the project site has no history of use as a mineral resource recovery operation. As such, the project site is not considered a source for mineral resources, and project development would not result in the loss of availability of known mineral resources. **No impacts would occur in this regard.**

b) Result in the loss of availability of a locally-important mineral resource recovery site	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
delineated on a local general plan, specific plan, or other land use plan?				

Response: No Impact. Refer to Response 4.XII(a), above. **No impact relative to mineral resources would occur.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.9 – Mineral Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.14 – Mineral Resources
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.02.120 – Surface Mining Permits
4. Moreno Valley Municipal Code Section 8.21.020 A 7 – Permits Required
5. The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, Sections 2710-2796), https://www.conservation.ca.gov/dmr/lawsandregulations

XIII. NOISE – Would the project result in:

The analysis and findings throughout this section are based on the *Noise Impact Analysis* (Noise Study) prepared by Roma Environmental, dated February 6, 2025, provided as **Appendix 7** of this IS/MND.

DISCUSSION

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the

specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10-dBA penalty for sounds occurring between 10 p.m. and 7 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA. High density residential areas can reach up to 70 dBA.

Two of the primary factors that reduce levels of environmental sounds are increasing the distance between the sound source to the receiver and having intervening obstacles such as walls, buildings, or terrain features between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receiver, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

REGULATORY FRAMEWORK

State

The Governor's Office of Land Use and Climate Innovation (LCI) Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The LCI Noise Element Guidelines contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of the community noise equivalent level (CNEL). ***Table 7, Land Use Compatibility for Community Noise Environments***, presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

Table 7: Land Use Compatibility for Community Noise Environments

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density, Single-Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	75 – 85
Residential – Multiple Family	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging – Motel, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	NA	65 – 85
Sports Arenas, Outdoor Spectator Sports	NA	50 – 75	NA	70 – 85
Playgrounds, Neighborhood Parks	50 – 70	NA	67.5 – 75	72.5 – 85

Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 70	NA	70 – 80	80 – 85
Office Buildings, Business Commercial, Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	75 – 85	NA

Notes: NA = Not Applicable; L_{dn} = Day/Night Average; CNEL = community noise equivalent level; dBA = A-weighted decibels

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable - New Construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable – New construction or development should generally not be undertaken.

Source:State of California Governor's Office of Planning and Research, *General Plan Guidelines*, July 2017.

Local

Moreno Valley General Plan

As discussed previously, the City is in the process of readopting the 2040 General Plan, Municipal Code, Zoning, and CAP consistent with the court's decision and issued a Notice of Preparation of a Revised Environmental Impact Report for MoVal 2040: The Moreno Valley Comprehensive General Plan Update, Municipal Code and Zoning (including Zoning Atlas) Amendments, and CAP on July 30, 2024. As such, the 2006 General Plan currently remains in effect. Goals, policies and objectives pertaining to noise are included below from both the 2006 and 2040 General Plans.

The 2006 General Plan does not contain a Noise Element; rather, a chapter regarding noise is included within the General Plan Safety Element Section 6.4, "Noise." Chapter 9, Goals and Objectives, of the 2006 General Plan contains the following objectives and policies related to the project:

Objective 6.3: Provide noise compatible land use relationships by establishing noise standards utilized for design and siting purposes.

Policies:

6.3.1: The following uses shall require mitigation to reduce noise exposure where current or future exterior noise levels exceed 20 CNEL above the desired interior noise level:

a. Single and multiple family residential buildings shall achieve an interior noise level of 45 CNEL or less. Such buildings shall include sound-insulating windows, walls, roofs and ventilation systems. Sound barriers shall also be installed (e.g. masonry walls or walls with berms) between single-family residences and major roadways.

b. New libraries, hospitals and extended medical care facilities, places of worship and office uses shall be insulated to achieve interior noise levels of 50 CNEL or less.

c. New schools shall be insulated to achieve interior noise levels of 45 CNEL or less.

6.3.2: Discourage residential uses where current or projected exterior noise due to aircraft over flights will exceed 65 CNEL.

Policy 6.3.3: Where the future noise environment is likely to exceed 70 CNEL due to overflights from the joint-use airport at March, new buildings containing uses that are not addressed under Policy 6.3.1 shall require insulation to achieve interior noise levels recommended in the March Air Reserve Base Air Installation Compatible Use Zone Report.

Policy 6.3.4 Encourage residential development heavily impacted by aircraft over flight noise, to transition to uses that are more noise compatible.

6.3.5 Enforce the California Administrative Code, Title 24 noise insulation standards for new multi-family housing developments, motels and hotels.

Objective 6.4: Review noise issues during the planning process and require noise attenuation measures to minimize acoustic impacts to existing and future surrounding land uses.

Policy 6.4.1: Site, landscape and architectural design features shall be encouraged to mitigate noise impacts for new developments, with a preference for noise barriers that avoid freeway sound barrier walls.

The Noise Element of the 2040 General Plan includes goals and policies seeking to promote the use of thoughtful planning and design to minimize unwanted noise in the community and promote a pleasant, healthy noise environment. The General Plan Noise Element contains the following goals and policies related to the project:

Goal N-1: Design for a pleasant healthy sound environment conducive to living and working.

Policy N.1-1: Protect occupants of existing and new buildings from exposure to excessive noise, particularly adjacent to freeways, major roadways, the railroad, and within areas of aircraft overflight.

Policy N.1-2: Guide the location and design of transportation facilities, industrial uses, and other potential noise generators to minimize the effects of noise on adjacent land uses.

Policy N.1-3: Apply the community noise compatibility standards to all new development and major redevelopment projects outside the noise and safety compatibility zones established in the March Air Reserve Base/ Inland Port Airport Land Use Compatibility (ALUC) Plan in order to protect against the adverse effects of noise

exposure. Projects within the noise and safety compatibility zones are subject to the standards contained in the ALUC Plan.

Policy N.1-4: Require a noise study and/or mitigation measures if applicable for all projects that would expose people to noise levels greater than the "normally acceptable" standard and for any other projects that are likely to generate noise in excess of these standards.

Policy N.1-5: Noise impacts should be controlled at the noise source where feasible, as opposed to at the receptor end with measures to buffer, dampen, or actively cancel noise sources. Site design, building orientation, building design, hours of operation, and other techniques, for new developments deemed to be noise generators shall be used to control noise sources.

Policy N.1-6: Require noise buffering, dampening, or active cancellation, on rooftop or other outdoor mechanical equipment located near residences, parks, and other noise sensitive land uses.

Policy N.1-7: Developers shall reduce the noise impacts on new development through appropriate means (e.g., double-paned or soundproof windows, setbacks, berming, and screening). Noise attenuation methods should avoid the use of visible sound walls where possible.

Goal N-2: Ensure that noise does not have a substantial, adverse effect on the quality of life in the community.

Policy N.2-3: Limit the potential noise impacts of construction activities on surrounding land uses through noise regulations in the Municipal Code that address allowed days and hours of construction, types of work, construction equipment, and sound attenuation devices.

Moreno Valley Municipal Code

The City's noise regulations are contained within the Moreno Valley Municipal Code. The following sections of the Municipal Code are applicable to the proposed project.

Section 8.14.040(E), Hours of Construction

Any construction within the city shall only be completed between the hours of seven a.m. to seven p.m. Monday through Friday, excluding holidays and from eight a.m. to four p.m. on Saturday, unless written approval is obtained from the city building official or city engineer.

Section 11.80.030 (D,7), Construction and Demolition

No person shall operate or cause the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between the hours of eight p.m. and seven a.m. the following day such that the sound there from creates a noise disturbance, except for emergency work by public service utilities or for other work approved by the city manager or designee.

Section 9.03.040 (D8) Residential site development standards.

In all residential districts, air conditioners, heating, cooling and ventilating equipment and all other mechanical, lighting or electrical devices shall be operated so that noise levels do not exceed 60 dBA (Ldn) at the property line. Additionally, such equipment, including roof-mounted installation, shall be screened

from surrounding properties and streets and shall not be located in the required front yard or street side yard. All equipment shall be installed and operated in accordance with other applicable city ordinances.

SIGNIFICANCE OF CHANGES IN TRAFFIC NOISE LEVELS

Project generated vehicle traffic would result in a substantial increase in ambient noise levels if:

1. It results in a 5 dBA increase or more at noise sensitive land uses where existing ambient noise levels are than 60 dBA;

2. It results in a 3 dBA increase at a noise sensitive land use where existing ambient noise levels range between 60 and 65 dBA; or

3. If it results in a 1.5 dBA increase at a noise sensitive land use where existing noise levels exceed 65 dBA.

EXISTING CONDITIONS

The project site is located in a moderately urbanized area. Noise emanating from vehicles traveling on nearby roadways is the dominant noise source. Other noise sources included occasional overhead aircraft and residential ambiance. The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

Existing Roadway Noise Levels

The majority of the existing mobile source noise in the project area is generated from vehicles traveling along SR-60 and Box Springs Road. The project site would be accessed via SR-60, Day Street and Box Springs Road. Existing and Existing Plus Project traffic noise was modeled in order to estimate the project's contribution to existing vehicle noise along these roadways, based on the modeling assumptions provided in the project's *Noise Study*. Based on this analysis, existing traffic noise levels range between 70.6 and 74.34 dBA CNEL.

Existing Ambient Noise Levels

In order to quantify existing ambient noise levels in the vicinity of the project site, short-term and long-term noise measurements were taken at five locations within the project vicinity. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the project site. Measured short-term (15-minute) noise levels in the project vicinity ranged between 47.6 and 70.2 dBA Leq and measured long-term (24-hour) noise levels ranged between 57.1 and 65.5 dBA Leq. The results of the field measurements are included in the project's *Noise Study.*

Sensitive Receptors

The State of California defines sensitive receptors as those land uses that require serenity or are otherwise adversely affected by noise events or conditions. Schools, libraries, churches, hospitals, and single and multiple family residential, including transient lodging, motels, and hotel uses, make up the majority of these areas.

Existing sensitive receptors that may be affected by project construction noise include multiple family residential land uses immediately west of the project site and single-family residential land uses north and northwest of the project site. While not normally considered to be "noise sensitive," standards have been established to control noise impacts to commercial land uses as well. For this reason, construction and operational noise impacts were also evaluated at existing nearby commercial land uses located east and

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
south of the project site.				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐

Response: Less than Significant Impact with Mitigation Incorporated. It is difficult to specify noise levels that are generally acceptable to everyone; noise that is considered a nuisance to one person may be unnoticed by another. Standards may be based on documented complaints in response to documented noise levels or based on studies of the ability of people to sleep, talk, or work under various noise conditions.

SHORT-TERM CONSTRUCTION IMPACTS

Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. Construction activities would occur over approximately 20 months and would include the following phases: grading, building construction, paving, and architectural coating. Ground-borne noise and other types of construction-related noise impacts would typically occur during the initial earthwork phases. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in ***Table 8, Maximum Noise Levels Generated by Typical Construction Equipment***. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Table 8: Maximum Noise Levels Generated by Typical Construction Equipment

Type of Equipment	Acoustical Use Factor[1]	Spec. L_{max} at 50 Feet (dBA, slow)	Actual Measured L_{max} at 50 Feet (dBA, slow)
Backhoe	40	80	78
Cement Mortar Mixers	15	83	N/A
Compactor (ground)	20	80	83
Compressor (air)	40	80	78
Crane	16	85	81
Dozer	40	85	82
Dump Truck	40	84	76
Excavator	40	85	81
Flat Bed Truck	40	84	74
Forklift	50	N/A	61
Front End Loader	40	80	79
Generator	50	82	81
Grader	40	85	N/A
Manlift	20	85	75
Roller	20	85	80
Tractor	40	84	N/A
Welder	40	73	74

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Source: Federal Highway Administration, Roadway Construction Noise Model (*FHWA-HEP-05-054*), January 2006.

Notes: 1 = Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Project-specific noise levels generated by construction equipment are shown in ***Table 9, Project Construction Noise Levels***. As shown in ***Table 9***, construction noise levels during the loudest phase of construction (paving) are expected to range between 67.8 and 73.5 dBA Leq at nearby receptors north, northwest, east, west, and south of the project site and would not exceed the 80 dBA Leq (eight-hour) daytime noise standard at residential land uses between the hours of 7:00 AM and 10:00 PM or the 85 dBA Leq (eight-hour) daytime noise standard at commercial land uses between the hours of 7:00 AM and 10:00 PM. Demolition, site preparation, grading and paving activities may, however, exceed the nighttime (10:00 PM to 7:00 AM) noise standards of 70 dBA Leq (8-hr).

In order to avoid exceeding the nighttime standard, grading and paving activities associated with project construction would be limited to between 7:00 AM and 7:00 PM Monday through Friday, or outside of the hours between 8:00 AM and 4:00 PM on a Saturday, on a Sunday or on a Holiday, as outlined in Moreno Valley Municipal Code Section 8.14.040[E]). The code does allow for exceptions for emergency work conducted by a public service utility or for otherwise approved by the city manager or designee. In addition, the project would implement best management practices to minimize construction noise impacts, as described in the project's *Noise Study.* **Therefore, the project's construction-related noise impacts would be less than significant.**

Table 9: Project Construction Noise Levels

Construction Phase	Receptor Location	Construction Noise Levels (dBA Leq)	Applicable FTA Threshold (dBA Leq)	Exceeds Applicable FTA Threshold?
Demolition	Multiple Family Residential to the West	73.2	80	No
	Single Family Residential to the North	72.8	80	No
	Single Family Residential to the North	67.5	80	No
	Commercial Land Uses to the East	71.0	85	No
	Commercial Land Uses to the South	69.6	85	No
Site Preparation	Multiple Family Residential to the West	72.5	80	No
	Single Family Residential to the North	72.0	80	No

ISSUES & SUPPORTING INFORMATION SOURCES:			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	Single Family Residential to the North	66.9		80	No	
	Commercial Land Uses to the East	70.2		85	No	
	Commercial Land Uses to the South	68.8		85	No	
Grading	Multiple Family Residential to the West	72.6		80	No	
	Single Family Residential to the North	72.2		80	No	
	Single Family Residential to the North	66.9		80	No	
	Commercial Land Uses to the East	70.4		85	No	
	Commercial Land Uses to the South	69.0		85	No	
Building Construction	Multiple Family Residential to the West	68.9		80	No	
	Single Family Residential to the North	68.5		80	No	
	Single Family Residential to the North	63.2		80	No	
	Commercial Land Uses to the East	66.7		85	No	
	Commercial Land Uses to the South	65.3		85	No	
Paving	Multiple Family Residential to the West	73.5		80	No	
	Single Family Residential to the North	73.1		80	No	
	Single Family Residential to the North	67.8		80	No	
	Commercial Land Uses to the East	71.3		85	No	
	Commercial Land Uses to the South	69.9		85	No	
Architectural Coating	Multiple Family Residential to the West	58.8		80	No	

	Single Family Residential to the North	58.3	80	No
	Single Family Residential to the North	53.0	80	No
	Commercial Land Uses to the East	56.5	85	No
	Commercial Land Uses to the South	55.1	85	No
Source: Roma Environmental, *Noise Impact Analysis,* February 6, 2025, Table 12.				

LONG-TERM OPERATIONAL IMPACTS

On-site Noise Impacts

On-site noise sources associated with the proposed townhomes would include slow-moving vehicles, recreation, and heating and ventilation (HVAC) noise. Although a pool and recreational buildings are proposed, they would be located in the center of the project site and sounds associated with these sources would not be audible at nearby off-site land uses due to intervening structures. Further, no internal roadways border the eastern or northern project boundaries, and as such, noise associated with those would also be shielded by the proposed townhomes. The HVAC units would be similar but newer than those being used at adjacent multi- and single-family homes. However, no HVAC units would be located closer than 20 feet from the project site property line. HVAC noise levels modeled using the SoundPLAN noise model showed that operational noise levels would range between 48.0 and 52.2 dBA Ldn/CNEL and would not exceed the City's noise threshold of 60 dBA Ldn at any nearby sensitive land uses. **Therefore, the project's operational on-site noise impacts would be less than significant.**

Off-site Noise Impacts

In order to determine if project generated vehicle trips would result in a substantial increase in ambient noise levels, they were evaluated in light of the existing noise environment, which is dominated by vehicle traffic. The proposed project would add an additional 944 average daily trips (ADTs) to existing traffic volumes. Existing and Existing Plus Project traffic noise levels were modeled using a conservative assumption that all of the project trips would travel along SR-60, Day Street and Box Spring Road to access the project site.

Roadway segment noise levels for the "Existing Without Project" and "Existing with Project" scenarios were compared to evaluate project-related operational noise impacts. According to ***Table 10, Change in Existing Noise Levels Along Roadways With Project (dBA CNEL)***, existing traffic noise levels would range between 70.6 and 74.34 dBA CNEL and existing plus project traffic noise would range between 70.8 and 74.35 dBA CNEL. The project would contribute less than a one-decibel increase in ambient noise levels along affected road segments. Therefore, the proposed project would not exceed applicable standards and would not result in substantial increases in ambient noise levels. **Therefore, the project's off-site operational impacts would be less than significant.**

Table 10: Change in Existing Noise Levels Along Roadways With Project (dBA CNEL)

	CNEL at the Right-of-Way			
Roadway	**Existing Without Project**	**Existing With Project**	**Change in Noise Level**	**Potential Significant Impact (Yes/No)**
SR-60	73.15	73.15	0	No
Day Street	70.60	70.80	0.2	No
Box Springs Road	74.34	74.35	0.01	No
Source: Roma Environmental, *Noise Impact Analysis,* February 6, 2025, Table 13				

Buildout Traffic Noise Levels at the Project Site (Noise/Land Use Compatibility)

The proposed project would be exposed to noise levels that exceed applicable thresholds if:

1. Exterior noise levels would exceed applicable normally acceptable noise levels as presented in the City of Moreno Valley Community Noise Compatibility Matrix (65 dBA CNEL at residential land uses). Design measures can be implemented to reduce exterior noise levels in order to provide adequate outdoor activity areas to avoid this impact.

2. Interior noise levels of proposed residential units exceed 45 dBA CNEL.

As discussed previously, traffic noise levels associated with SR-60 and Box Springs Road are and would be the main sources of noise affecting the project site. Based on the project's *Noise Study,* combined modeled future traffic noise levels associated with SR-60 and Box Springs Road are expected to reach 72.9 dBA CNEL at the closest proposed residential building. As noise levels are expected to exceed 65 dBA at the first row of sensitive receptors, **Mitigation Measure NOI-1** is required to achieve acceptable interior noise levels of 45 dBA CNEL or less. **Mitigation Measure NOI-1** includes a project-specific design feature requirement that all south, east and west facing windows and sliding glass doors of the first row of residential units (adjacent to Box Springs Road) shall have a Sound Transmission Class (STC) rating of at least 31, which would reduce noise impacts to an acceptable interior noise level. **As such, this impact would be reduced to less than significant with mitigation incorporated.**

Mitigation Measures

MITIGATION MEASURES

NOI-1 To satisfy the State of California's 45 dBA CNEL noise insulation standards, the proposed "first row" residential buildings (adjacent to Box Springs Road) will require a windows-closed condition and a means of mechanical ventilation (e.g. air conditioning). Additionally, all windows and sliding glass doors shall have well-fitted, well-weather-stripped assemblies and meet the required Sound Transmission Class (STC) rating of at least 31.

NOI-2 The following design criteria shall also be required to ensure interior noise levels do not exceed 45 dBA CNEL.

- Exterior Walls: At any penetrations of exterior walls by pipes, ducts, or conduits, the space between the wall and pipes, ducts, or conduits shall be caulked or filled with mortar to form an airtight seal.

- Roof: Roof sheathing of wood construction shall be per manufacturer's specification or caulked plywood of at least one-half inch thick. Ceilings shall be per manufacturer's specification or wellsealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
• Ventilation: Exterior vents installed on first-row residential buildings shall be oriented away from roadway. If such an orientation cannot be avoided, then an acoustical baffle shall be placed in the attic space behind the vents.				
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

Response: Less than Significant Impact. Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Federal Transit Administration (FTA) provides reasonable criteria for addressing potential impacts related to groundborne vibration. The peak particle velocity (PPV) threshold for risk of "architectural" damage is 0.5 inches per second (in/sec) for reinforced concrete, steel or timber (no plaster) buildings, 0.3 in/sec for engineered concrete and masonry (no plaster) buildings, 0.2 in/sec for non-engineered timber and masonry buildings, and 0.1 in/sec for buildings extremely susceptible to vibration damage.

Construction of the proposed project would include grading, paving, building construction, and architectural coatings. The highest degree of groundborne vibration would be generated during the grading phase due to the operation of bulldozers. Groundborne vibration modeling was performed using vibration propagation equations and construction equipment source levels obtained from the FTA Transit Noise and Vibration Impact Assessment Manual (2018). ***Table 11, Typical Vibration Levels for Construction Equipment,*** shows typical vibration levels associated with commonly used construction equipment based on data from the FTA.

Table 11: Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inches/second)	Approximate Lv at 25 feet[1]
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: Federal Transit Administration: Transit Noise and Vibration Impact Assessment Manual, 2018.

Notes: 1 = RMS velocity in decibels, VdB re 1 micro-in/sec

2 = Only the equipment expected to be used for the proposed project were excerpted from the FTA table and included here.

As indicated in ***Table 11***, vibration velocities from typical heavy construction equipment operation would range from 0.003 to 0.21 inch/second PPV at 25 feet from the source of activity. Based on the provided site plan and aerial photographs, the nearest off-site structure is a multi-family residential building located approximately 25 feet west of the project site. The greatest potential sources of groundborne vibration

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
expected to be utilized during construction of the project include a vibratory roller and a large bulldozer. As shown above, a vibratory roller can generate a vibration level of approximately 0.21 in/sec PPV at a distance of 25 feet, while a large bulldozer can generate a vibration level of 0.089 in/sec PPV at 25 feet. At 25 feet, vibration levels produced by a vibratory roller would attenuate to a PPV of approximately 0.21 in/sec; and vibration levels produced by a large bulldozer would attenuate to a PPV of approximately 0.089 in/sec. Therefore, use of vibratory equipment during project construction would not cause groundborne vibration that is likely to result in structural damage. **A less than significant impact would occur.**				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Response: No Impact. The closest public use airport to the project site is the March Air Reserve Base/Inland Port, located approximately 3.5 miles southeast of the project site. The project site is located outside of the airport's noise contours.[29] In addition, the project site is not located within the vicinity of a private airstrip. **As such, no impact would occur.**

MITIGATION MEASURES

NOI-1 To satisfy the State of California's 45 dBA CNEL noise insulation standards, the proposed "first row" residential buildings (adjacent to Box Springs Road) will require a windows-closed condition and a means of mechanical ventilation (e.g. air conditioning). Additionally, all windows and sliding glass doors shall have well-fitted, well-weather-stripped assemblies and meet the required Sound Transmission Class (STC) rating of at least 31

NOI-2 The following design criteria shall also be required to ensure interior noise levels do not exceed 45 dBA CNEL.

- Exterior Walls: At any penetrations of exterior walls by pipes, ducts, or conduits, the space between the wall and pipes, ducts, or conduits shall be caulked or filled with mortar to form an airtight seal.
- Roof: Roof sheathing of wood construction shall be per manufacturer's specification or caulked plywood of at least one-half inch thick. Ceilings shall be per manufacturer's specification or well-sealed gypsum board of at least one-half inch thick. Insulation with at least a rating of R-19 shall be used in the attic space.
- Ventilation: Exterior vents installed on first-row residential buildings shall be oriented away from roadway. If such an orientation cannot be avoided, then an acoustical baffle shall be placed in the attic space behind the vents.

SIGNIFICANCE OF IMPACT AFTER MITIGATION

Implementation of **Mitigation Measure NOI-1** and **NOI-2** would ensure that potentially significant noise impacts consisting of an exceedance of noise standards relative to buildout traffic noise levels at the project

[29] Air Force Reserve Command, *Final Installations Compatible Use Zones Study March Air Reserve Base Riverside*, 2018, https://www.marchjpa.com/documents/docs_forms/AICUZ_2018.pdf, Accessed February 13, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

site are mitigated, thereby reducing impacts to a less than significant level.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.4 – Noise
     - Figure 6-2 – Buildout Noise Contours
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.4 – Noise
     - Figure 5.4-1 – March Air Reserve Base Noise Impact Area
     - Figure 5.4-2 – Buildout Noise Contours – Alternative 1
     - Figure 5.4-3 -- Buildout Noise Contours – Alternative 2
     - Figure 5.4-4 -- Buildout Noise Contours – Alternative 3
   - Appendix D – Noise Analysis, Wieland Associates, Inc., June 2003.
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.140 Noise and Sound
4. Moreno Valley Municipal Code Chapter 11.80 Noise Regulations
5. March Air Reserve Base (MARB)/March Inland Port (MIP) Airport Land Use Compatibility Plan (ALUCP) on November 13, 2014, (http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700)

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

Response: Less than Significant Impact. A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. In 2024, the California Department of Finance estimated that Moreno Valley had an average household size of 3.61 persons per household.[30]

The most recent Regional Housing Needs Assessment (RHNA) allocation released by the Southern California Association of Governments (SCAG) for the City identifies the need for an additional 13,627 housing units in the City over the next eight years.[31] Assuming 139 residential units as part of the proposed project, the project would generate approximately 505 residents and would accommodate approximately 1.0 percent of the City's RHNA allocation. Therefore, the project as proposed is consistent with the

[30] California Department of Finance. May 2024. E-5 Population and Housing Estimates for Cities, Counties, and the State, 202-2024 with 2020 Census Benchmark. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024 | Department of Finance. Accessed February 6, 2025.

[31] Southern California Association of Governments. 2022. 6th Cycle Final RHNA Allocation Plan. https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1616462966. Accessed February 6, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

anticipated population growth that its City is required to plan for under its' 6th Cycle Housing Element.

The City's current population is 207,146 persons as of January 1, 2024.[32] The forecast population in 2050 is 247,300 persons.[33] The project's potential growth-inducing impacts would be considered less than significant since the 505 additional residents represents only a 0.24 percent increase from the City's current population and 1.3 percent of the City's population increase between 2024 and 2050. Thus, the project would be consistent with the types, intensity, and patterns of land use envisioned for the site vicinity and with growth projections. **Impacts would be less than significant.**

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

Response: No Impact. Approximately 1.5 acres of the project site along the frontage with Box Springs Road is developed with a small, linear strip mall of separate offices and storefronts, which would be demolished during project construction. However, there are no existing residences on-site. As such, project implementation would not displace existing people or housing. **No impacts would occur in this regard.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.1 – Land Use
     - Figure 2-1 – Neighboring Lands Uses
     - Figure 2-2 – Land Use Map
   - Chapter 8 – 2014 – 2021 Housing Element
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.12 – Population and Housing
     - Attachments #1 - #10 – Housing Sites Inventory
     - Exhibits A1 – A11, C, D, and E – Maps of Housing Sites
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

[32] Ibid.

[33] Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Demographics & Growth Forecast*, September 3, 2020.

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

Response: Less than Significant Impact. Fire and emergency medical services are provided by Moreno Valley Fire Department (MVFD), under contracts with the Riverside County Fire Department (RCFD) and California Department of Forestry and Fire Protection (Cal Fire) for provision of services as part of an integrated regional fire protection system. The MVFD operates seven fire stations in Moreno Valley. Although the project site is in Moreno Valley, the nearest fire station to the project site is RCFD Fire Station 13 (FS 13), also known as "Sycamore Canyon", and is located at 6490 Sycamore Canyon Blvd in the City of Riverside. Riverside Fire Department (RFD) is in the process of staffing truck companies with 4 personnel, which would increase the staffing at RFD Station 13 to 8 personnel. MVFD Fire Station 6 (FS 6) identified as "Towngate", is located at 22250 Eucalyptus Ave in Moreno Valley and will provide secondary response to the Project site. FS 6 has one staffed Type 1 engine and one staffed medic squad. RFD Fire Station 14 (FS 14), known as "Canyon Crest", is located at 725 Central Avenue in the City of Riverside and would provide additional response to the project site. FS 14 has two Type 1 medic engines, two cross-staffed quads, and a utility. Engine 14 is cross-staffed with Cal-OES Engine 8635 and the quads are cross-staffed with Engine 14 personnel at FS 14. MVFD Fire Station 2 (FS 2) identified as "Sunnymead", located at 24935 Hemlock in Moreno Valley, will provide added response to the project site. FS 2 has one staffed Type 1 engine and one staffed ladder truck (Dudek 2025).

The proposed project would create an increased demand for fire protection services as a result of the addition of new residents. However, the project would not induce significant or unplanned population growth; refer to Section 4.14, *Population and Housing*. Further, the proposed project would be conditioned to comply with the requirements of the MVFD for emergency access, fire flow, fire protection standards, fire lanes, and other site design/building standards. Because the project is set in a very high fire zone, the project must comply with materials and construction methods for exterior wildfire exposure set forth in Chapter 7a of the 2022 California Building Code (CBC), Section R337 of the California Residential Code (CRC), and Chapter 49 of the 2022 California Fire Code (CFC). The Project Applicant is required to comply with the provisions of the City of Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695), which requires a fee payment that the City applies to the funding of public facilities, including fire protection facilities. Payment of these fees would offset the project's impacts to the acquisition, design, and construction of new fire facilities. **Following collection of development impact fees and compliance with MVFD, California Fire Code (included in Moreno Valley Municipal Code Chapter 8.36, *California Fire Code*), CRC compliance, and CBC requirements, impacts to fire protection facilities would be less than significant.**

ii) Police protection?	☐	☐	☒	☐

Response: Less than Significant Impact. The Moreno Valley Police Department (MVPD) provides law enforcement services through a contract with the Riverside County Sheriff's Department (RCSD) for police protection services. Specifically, police protection services for

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

the project area are provided by the MVDP located at 22850 Calle San Juan De Los Lagos in Moreno Valley, approximately 2.7 miles southeast of the project site.

The proposed project would create an increased demand for police protection services. However, the project would not induce significant or unplanned population growth; refer to Section 4.14, *Population and Housing*. The Project Applicant is required to comply with the provisions of the City of Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695), which requires a fee payment that the City applies to the funding of public facilities, including police protection facilities. Payment of these fees would offset the project's impacts to the acquisition, design, and construction of new police facilities. The MVPD would have the opportunity to review the project design plans and include conditions that would be required in order for the applicant to be issued development permits. As a 139-unit multi-family residential development project, the proposed project is not expected to result in any unusual circumstances that may generate high demand for police protection services. Therefore, payment of the City's development impact fees would fully mitigate any potential impact on MVPD facilities. **A less than significant impact would occur.**

iii) Schools?	☐	☐	☒	☐

Response: Less than Significant Impact. The proposed project site is located within the boundaries of the Moreno Valley Unified School District (MVUSD). The nearest elementary school is Seneca Elementary School at 11615 Wordsworth Road, located approximately 0.2-mile northwest of the project site. The nearest middle school is Vista Heights Middle School at 23049 Old Lake Drive, located approximately 2.5 miles northeast of the project site. The nearest high school is Canyon Springs High School at 23100 Cougar Canyon Road, approximately 2.0 miles northeast of the project site.

The project would not induce significant or unplanned population growth; refer to Section 4.14, *Population and Housing.* In addition, the project would be required to comply with Senate Bill (SB) 50 requirements, which allow school districts to collect impact fees from developers of new projects. According to Section 65997 of the California Government Code, payment of statutory fees is the exclusive method of mitigating environmental effects related to the adequacy of school facilities when considering the approval or the establishment of conditions for the approval of a development project. **Thus, upon payment of required fees by the Project Applicant consistent with existing State requirements, impacts would be less than significant.**

iv) Parks?	☐	☐	☒	☐

Response: Less than Significant Impact. According to the City's *Parks, Community Services and Trails Master Plan* (December 2023, the City's Parks and Community Services Department is responsible for the operation and maintenance of over 400 acres of parks, over 20 miles of trails, and five public recreation facilities. Additionally, the City maintains joint use agreements with the MVUSD for off-hour use of some school facilities, including gymnasiums and swimming pools**.**

There are no existing or planned parks or recreational areas within the project's immediate vicinity. The nearest park, Towngate Memorial Park, is located at 13051 Elsworth Street approximately 1.6 miles southeast of the project site. However, as described previously, proposed open space and recreational amenities within the project site would include a

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

clubhouse, pool, and gym, and approximately 1.04-acre common open space area for use by the residents generated by the project. Additionally, the project would not induce significant or unplanned population growth; refer to Section 4.14, *Population and Housing.*

In addition, Section 3.38.080, *Park Improvements Residential Development Impact Fees*, and Chapter 3.40, *Dedication of Land for Park Facilities and Payment of In-Lieu Fees,* of the Moreno Valley Municipal Code include requirements for mitigation fees in favor of park improvements and/or parkland dedication; where applicable, these fees would be included as a condition of the approval of the residential development. **Therefore, this impact would be less than significant.**

v) Other public facilities?	☐	☐	☒	☐

Response: Less than Significant Impact. The project would not induce significant or unplanned population growth; refer to Section 4.14, *Population and Housing.* The project involves the development of a 139-unit multi-family residential development and does not propose new or physically altered public facilities. Thus, the proposed project would not result in an increase in the demand for other governmental services such as economic development and other community support services commonly provided by the City. **This impact would be less than significant.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.5 – Schools
     - Figure 2-3 – School District Boundaries
   - Chapter 2 – Community Development Element – Section 2.6 – Library Services
   - Chapter 2 – Community Development Element – Section 2.7 – Special Districts
   - Chapter 2 – Community Development Element – Section 2.5 – Other City Facilities
   - Chapter 4 – Parks, Recreation and Open Space Element – Section 4.3 – Parks and Recreation
     - Figure 4-2 – Future Parklands Acquisition Areas
     - Figure 4-3 – Master Plan of Trails
   - Chapter 6 – Safety Element – Section 6.1 – Police Protection and Crime Preventions
   - Chapter 6 – Safety Element – Section 6.2 – Fire and Emergency Services
     - Figure 6-1 – Fire Stations
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.13 – Public Services
     - Figure 5.13-1 – Location of Public Facilities
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. *Fire Protection Plan*, prepared by Dudek, dated September 2025, and as provided as **Appendix 9** of this IS/MND.

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

Response: Less than Significant Impact. Refer to Response 4.XV(a)(iv). It is not anticipated that the proposed project would generate a substantial number of new jobs or induce substantial unplanned population growth in the City. The project would develop onsite recreational amenities for use by the residents generated by the project as described previously; these proposed onsite private amenities are expected to adequately address the park and recreation needs of the project's residents.

Additionally, the project would also be required to pay requisite development impact fees in accordance with Section 3.38.080, *Park Improvements Residential Development Impact Fees*, and Chapter 3.40, *Dedication of Land for Park Facilities and Payment of In-Lieu Fees,* of the Moreno Valley Municipal Code. **Impacts would be less than significant in this regard.**

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

Response: Less than Significant Impact. Refer to Response 4.XV(a)(iv). The proposed project includes recreational amenities for use by residents but would not include the construction or expansion of any public parks or recreational facilities. As described previously, the proposed project would not increase the demand for parks or other recreational facilities and would not require the construction or expansion of any such facilities. Furthermore, the construction of the new park facilities was considered through the environmental analysis of proposed development and would not result in any physical environmental effects beyond those identified in this IS/MND. For example, construction-related emissions from development of proposed recreational facilities are included in Sections 4.3, *Air Quality*, and 4.8, *Greenhouse Gas Emissions*. **Therefore, this impact would be less than significant.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 4 – Parks, Recreation and Open Space Element – Section 4.3 – Parks and Recreation
     - Figure 4-1 – Open Space
     - Figure 4-2 – Future Parklands Acquisition Areas
     - Figure 4-3 – Master Plan of Trails
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.13 – Public Services
     - Figure 5.13-1 – Location of Public Facilities
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
The analysis and findings throughout this section are based on the *Farm Bureau 140 (PEN24-0058, TTM 38955) Trip Generation (TG) Assessment* (TG Assessment) prepared by Urban Crossroads, Inc., dated June 14, 2024, and the *Farm Bureau 140 (PEN24-0058, TTM 38955) Vehicle Miles Traveled (VMT) Assessment* (VMT Assessment) prepared by Urban Crossroads, Inc., dated June 19, 2024, provided as **Appendix 8A** and **8B,** respectively, of this IS/MND.				
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

Response: Less than Significant Impact.

Methodology

State CEQA Guidelines Section 15064.3 was released on December 28, 2018, to address the determination of significance for transportation impacts. The new guidelines require that the analysis is based on vehicle miles traveled (VMT) instead of congestion (such as level of service, or LOS). The change in the focus of transportation analysis is the result of legislation (SB 743) and is intended to shift the emphasis from congestion to, among other things, reducing GHG emissions, promoting a diversity of land uses, and developing multimodal transportation networks. Pursuant to CEQA Guidelines Section 15064.3(c), this change in analysis is mandated to be used beginning July 1, 2020. Refer to Response 4.17(b) below for the project impacts relative to VMT.

In addition, a project-specific Trip Generation (TG) Assessment was prepared for the project, which describes the proposed project trip generation and determines whether any traffic operations analysis is required based on the City's *Transportation Impact Analysis Preparation Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (City Guidelines) dated June 2020. As discussed in the TG Assessment, the project would generate less than 100 peak hour trips. As such, an LOS-based traffic impact analysis is not required beyond the trip generation assessment and is therefore not included in this analysis.[34]

Existing Conditions

- Roadways. Regional access to the project site is provided by I-215 and SR-60; the I-215/SR-60 freeway interchange is located approximately 550 feet south of the project site. Local access to the project site is provided by Box Springs Road, which borders the site to the south. Box Springs Road along the project frontage is classified as a Minor Arterial in the City's General Plan Circulation Element.

- Transit. Public transportation services within the project area include bus transit service provided by the Riverside Transit Agency (RTA). The closest transit route to the project is located on Box Springs Road via Route 16. Route 16 provides transit service on Box Springs Road and Day Street

[34] The City reserves the right to require an Applicant to prepare additional traffic analysis based on the project location, configuration, unique aspects of the project, proximity to major roadways, interchanges, or intersections evaluating corner site distance at the driveways, or other requirements as determined by the City.

(approximately 0.75-mile east of the site), within the project area. There are bus stops approximately 500 feet east and 500 feet west of the project site along Box Springs Road.

- Pedestrian/Bicycle Facilities. The City uses three types of bike path classifications including Class I multi-use paths, Class II bicycle lanes, and Class III bicycle routes. There is an existing Class II bike lane along Box Springs Road, adjacent to the project site. In addition, pedestrian facilities (sidewalks) are built out along portions of Box Springs Road. The project would construct sidewalks along the roadways adjacent to the project site.

Project Trip Generation

The trip generation for the project is based on trip generation rates from the Institute of Transportation Engineers' (ITE) Trip Generation (11th Edition) and are based on Land Use 220 "Multifamily (Low-Rise) Housing." Based on the trip generation calculation provided in the TG Assessment, the project is anticipated to generate 56 trips during the a.m. peak hour, 71 trips during the p.m. peak hour, and 944 daily trips.

Conclusion

Implementation of the project would not result in any disruption to existing bicycle, pedestrian or transit facilities. The project would not modify transit stop locations or change transit headways. The project is consistent with the adopted plans regarding bicycle and pedestrian infrastructure and is not expected to decrease the performance or safety of these facilities. Therefore, the project would not conflict with a program plan, ordinance or policy addressing transit, bicycle, and pedestrian facilities, and would have a less than significant impact on active transportation.

As discussed above, the project would generate less than 100 peak hour trips. In addition, the project site has been designed to construct onsite roadway improvements consistent with City guidelines for private streets. The project would also pay Development Impact Fees (DIF) in compliance with City policies and regulations which require new developments to participate in the Transportation Uniform Mitigation Fee Program (TUMF), the DIF, and any other applicable transportation fee programs and benefit assessment districts. Therefore, the project would not conflict with a program plan, ordinance or policy addressing the circulation system, including roadway facilities. **This impact would be less than significant.**

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

Response: Less than Significant Impact.

Methodology

As described above, changes to the CEQA Guidelines Section 15064.3 became effective July 1, 2020, which require all lead agencies to adopt VMT as a replacement for automobile delay-based LOS as the new measure for identifying transportation impacts for land use projects. The City Guidelines address changes to CEQA pursuant to SB 743 to include VMT analysis methodology, screening tools, and VMT thresholds.

Consistent with City Guidelines, VMT has been estimated using the Production/Attraction (PA) method. The PA method for calculating VMT sums all weekday VMT generated by Home-Based (HB) and Home-Based Work (HBW) trips with at least one trip-end in the study area (i.e., individual Traffic Analysis Zone [TAZ]) by trip purpose. Productions are land use types that generate trips (residences), and attractions are land use types that attract trips (employment). The PA method allows project-generated VMT to be evaluated based on trip purpose, which is consistent with recommended analysis methodologies outlined by both the Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) and City Guidelines.

Consistent with City Guidelines, project-generated VMT estimates are presented as HB VMT per capita for

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

residential uses. Project generated HB VMT per capita is an efficiency metric that represents VMT generated on a typical weekday per person who resides within the project. Use of this metric allows the City to compare the project to the remainder of the City for purposes of identifying transportation impacts.

City Guidelines also acknowledge that the VMT analysis should also contain an evaluation of a project's effect on VMT, which can be performed using the boundary method of calculating VMT. The boundary method is the sum of all weekday VMT on the roadway network within a designated boundary (i.e., City boundary). The boundary method estimates VMT by multiplying vehicle trips on each roadway segment within the boundary by that segment's length. This approach consists of all trips, including those trips that do not begin or end in the designated boundary. Consistent with City Guidelines, the City of Moreno Valley's boundary was used as the boundary for this assessment.

The City guidelines have established thresholds of significance for project-generated VMT for use as part of the environmental review process under CEQA. The following would result in a significant project-generated VMT:

1. A project would have a significant VMT impact if, in the "Existing Plus Project" (i.e., baseline) scenario, its VMT per capita (for residential projects) exceeds the per capita VMT for Moreno Valley.

2. If a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence. If it is not consistent with the RTP/SCS, then it would have a significant VMT impact if:

    a. For residential projects, its net VMT per capita exceeds the average VMT per capita for Moreno Valley in the RTP/SCS horizon year.

The City Guidelines note that the Cumulative "No Project" scenario shall reflect the adopted RTP/SCS; as such, if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence.

The City of Moreno Valley average VMT per capita was calculated using the RIVCOM model and found to be 15.9 VMT per capita.

Project-Generated VMT Analysis

VMT estimates for the project were extracted from RIVCOM using the PA trip matrices, which includes project-generated VMT for all home-based production trips. Based on the project's *VMT Assessment*, the VMT per capita for the project is 15.6 miles, while the City average is 15.9 miles. The project-generated VMT does not exceed the City's VMT per capita. Therefore, the project does not have a significant VMT impact based on the City's thresholds. **Impacts would be less than significant in this regard.**

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

Response: Less than Significant Impact. The project does not involve any unusual conditions, or hazardous design features, such as sharp curves or dangerous intersections, or incompatible uses. The project access and project improvements (i.e., signage, buildings, and landscaping) would be designed in accordance with City standards so that adequate sight distance for drivers entering and exiting the site is maintained. On-site traffic signing and striping would be implemented in conjunction with detailed construction plans for the project site. **With implementation of the recommended configuration of the**

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
driveways and frontage improvements as part of the project design, a less than significant impact would occur.				
d) Result in inadequate emergency access?	☐	☐	☒	☐

Response: Less than Significant Impact. The access and circulation features on the project site would accommodate emergency ingress and egress. Access to the project site would be provided via a driveway that would be located on Box Springs Road. The proposed site access improvements would ensure that access is maintained for fire trucks, police units, and ambulance/paramedic vehicles.

The project is subject to the City's design review to ensure that the project as designed does not temporarily or permanently interfere with the provision of emergency access or with evacuation routes. All emergency access features are subject to and must satisfy the City of Moreno Valley design requirements and be approved by the MVFD. To reduce construction-related traffic impacts and as a standard condition of the City, the Project Applicant would be required to implement a temporary Traffic Management Plan (TMP) to minimize temporary impacts to emergency access and evacuation routes during the construction process. **Therefore, the project would not result in inadequate emergency access and impacts would be reduced to less than significant.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 5 Circulation Element
     - Figure 9-1 – Circulation Plan
     - Figure 9-2 – LOS Standards
     - Figure 9-3 – Roadway Cross-Sections
     - Figure 9-4 – Bikeway Plan
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.2 – Traffic/Circulation
     - Figure 5.2-1 – Circulation Plan
     - Figure 5.2-2 – General Plan Roadway Cross-Sections
     - Figure 5.2-3 – Year 2000 Number of Through Lanes
     - Figure 5.2-4 – Year 2000 Daily Volume/Capacity (V/C) Ratios
     - Figure 5.2-5 – Year 2000 Average Daily Traffic Volumes
     - Figure 5.2-6 – Proposed Circulation Plan
     - Figure 5.2-7 – LOS Standards
   - Appendix B – Traffic Analysis, City of Moreno Valley General Plan Traffic Study, Urban Crossroads, June 2004.
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Chapter 3.18 Special Gas Tax Street Improvement Fund
5. Moreno Valley Master Bike Plan, adopted January 2015
6. Riverside County Transportation Commission, Congestion Management Program, December 14, 2011

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII.TRIBAL CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Response: Less than Significant Impact with Mitigation Incorporated. In compliance with AB52, the City distributed letters notifying the Native American Tribes that requested to be on the City's list for the purposes of AB52 (Agua Caliente Band of Cahuilla Indians, Desert Cahuilla Indians, Morongo Band of Mission Indians, Yuhaaviatam of San Manuel Nation, Rincon Band of Luiseño Indians, Pechanga Band of Luiseño Indians, and Soboba Band of Luiseño Indians) of the opportunity to consult with the City regarding the proposed project. Per AB52, tribal governments have 30 days to respond to the City's request for consultation.

Tribal representatives from the Pechanga Band of Indians, Morongo Band of Mission Indians, Rincon Band of Luiseno Indians, and the Soboba Band of Luiseno Indians requested consultation with the City. No response was received from the Agua Caliente Band of Cahuilla Indians. The Yuhaaviatam of San Manuel Nation declined consultation because the proposed project is located outside of Serrano ancestral territory. The tribes indicated during their request for consultation that the project site is located within the Pechanga, Morongo, Rincon and Soboba traditional use areas. However, no specific known tribal cultural resources were identified at the project site.

The Pechanga tribe requested that no Phase II testing or other ground-disturbing archaeological activities be conducted on the site until after the Tribe and the City consult about the TCRs in their government-to-government consultation. The Morongo tribe has requested tribal monitoring during ground-disturbing activities. Both the Morongo tribe and the Rincon tribe have requested to receive copies of existing documents pertaining to the project such as the cultural survey including the archaeological site records, shape files, archaeological record search results and the geotechnical report, and project design/mass grading maps.

The consulting tribes support and request that efforts to preserve and protect sensitive Tribal Cultural Resources be made as early as possible in the development process. They also requested to participate in the environmental review process.

The consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented tribal archaeological and cultural resources during construction. These mitigation measures are incorporated in this Initial Study. The Pechanga Band of Indians, Morongo Band of Mission Indians, Soboba Band of Luiseño Indians, and Rincon Band of Luiseño Indians, requested monitoring for all ground disturbing activities.

City staff completed formal tribal consultation under AB52 on September 10, 2025. Any further input from the tribes will be through the 30-day public review period for CEQA.

All tribes who participated in the AB-52 consultation will be notified of any finds during construction and grading/ground disturbing activities will be halted until the resource is evaluated. To avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project's ground disturbing activities, **Mitigation Measures TCR-1** through **TCR-9** would be required. **Implementation of Mitigation Measures TCR-1 through TCR-9 would reduce potentially significant impacts to tribal cultural and archaeological resources to a less than significant level.**

MITIGATION MEASURES

TCR 1 Archaeological Monitoring. Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground-disturbing activities at Moreno Valley Farm Bureau (Tentative Tract Map 38955). The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Consulting Tribe(s), Pechanga Band of Indians, Morongo Band of Mission Indians, Soboba Band of Luiseño Indians, and Rincon Band of Luiseño Indians, including the contractor, and the City, shall develop a CRMP as defined in CR-3. The Project archeologist shall attend the pre-grading meeting with the City, the construction manager, and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological resources are unearthed.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

TCR 2 Native American Monitoring. Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Indians, Morongo Band of Mission Indians, Soboba Band of Luiseño Indians, and Rincon Band of Luiseño Indians, for tribal monitoring. The Developer is also required to provide a minimum of 30 days' advance notice to the tribes of all ground-disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological and cultural resources are unearthed. The Native American Monitor(s) shall attend the pre-grading meeting with the Project Archaeologist, the City, the construction manager, and any contractors and will conduct the Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.

TCR 3 Cultural Resource Monitoring Plan (CRMP). The Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting Tribe is defined as a Tribe that initiated the AB52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:

a. Project description and location;
b. Project grading and development scheduling;
c. Roles and responsibilities of individuals on the Project;
d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details;
e. The protocols and stipulations that the contractor, City, Consulting Tribe (s), and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;
f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items;
g. Contact information of relevant individuals for the Project.

TCR 4 Cultural Resource Disposition. In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Department:
    i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources.
    ii. On-site reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure CR 1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in CR 3. The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.

TCR 5 The City shall verify that the following note is included on the Grading Plan:

"If any suspected archaeological and cultural resources are discovered during ground–disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the

construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."

TCR 6 Inadvertent Finds. If potential historic or cultural resources are uncovered during excavation or construction activities at Moreno Valley Farm Bureau (Tentative Tract Map 38955) that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, all ground-disturbing activities in the affected area within 100 feet of the uncovered resource must cease immediately and a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal Representatives, and all site monitors per the Mitigation Measures, shall be consulted by the City to evaluate the find, and as appropriate recommend alternative measures to avoid, minimize or mitigate negative effects on the historic, or prehistoric resource. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional archeologists and Tribal Monitors, if needed. Determinations and recommendations by the consultant shall be immediately submitted to the Planning Division for consideration and implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic Preservation Officer (SHPO) and any and all Consulting Native American Tribes as defined in CR 2 before any further work commences in the affected area. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.

TCR 7 Human Remains. If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the “most likely descendant”. The “most likely descendant” shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA). **No photographs are to be taken except by the coroner, with written approval by the consulting Tribe(s).**

TCR 8 Non-Disclosure of Reburial Locations. It is understood by all parties that, unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 6254 (r), parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).

TCR 9 Archaeology Report - Phase III and IV. Prior to final inspection, the developer/permit holder shall prompt the Project Archaeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at the San Diego State University (SDSU), and one (1) copy shall be submitted to each of the Consulting Tribe(s) Cultural Resources Department(s).

SIGNIFICANCE OF IMPACT AFTER MITIGATION

With implementation of **Mitigation Measures TCR-1** through **TCR-9,** potentially significant impacts to tribal cultural resources would be reduced to a less than significant level.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.2 – Cultural and Historical Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.10 – Cultural Resources
     - Figure 5.10-1 – Locations of Listed Historic Resource Inventory Structures
     - Figure 5.10-2 – Location of Prehistoric Sites
     - Figure 5.10-3 – Paleontological Resource Sensitive Areas
   - Appendix F – Cultural Resources Analysis, Study of Historical and Archaeological Resources for the Revised General Plan, City of Moreno Valley, Archaeological Associates, August 2003.
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Title 7 – Cultural Preservation
5. Cultural Resources Inventory for the City of Moreno Valley, Riverside County, California, prepared by Daniel F. McCarthy, Archaeological Research Unit, University of California, Riverside, October 1987 (*This document cannot be provided to the public due to the inclusion of confidential information pursuant to Government Code Section 6254.10.*)

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Response: Less than Significant Impact.

The project site is served by the following utilities:

- Electricity – Southern California Edison (SCE)
- Water – Eastern Municipal Water District (EMWD)
- Sewer – EMWD
- Storm Drain – Riverside County Flood Control and Water Conservation District (RCFCWCD)
- Telecommunications – Frontier, Spectrum and AT&T
- Natural Gas – Southern California Gas Company (SoCalGas)

Electric Power, Natural Gas, and Telecommunications

The project site is located in a developed area of the City and is situated within close proximity to existing electric power, natural gas, and telecommunications facilities. Therefore, substantial new utility infrastructure would not be required with project implementation. Impacts would be less than significant.

Water

The project would require water for the irrigation of landscaped areas. However, it is not expected that water demand would increase substantially with project implementation. Water for the project would be provided

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
by EMWD and would connect to the existing water main located in adjacent roadways. Therefore, the expansion of off-site water facilities would not be required to serve the project. Impacts would be less than significant. *Storm Drain* The project's stormwater needs are met by the City of Moreno Valley and the RCFCWCD. In the developed condition, onsite low flow runoff from the proposed development would flow into four (4) onsite stormwater treatment areas (bioretention basins). Three of the bioretention basins would be located along the frontage of Box Springs Road and used for treatment of the onsite runoff. The fourth bioretention basin would be located at the northwest corner of the project site and would be used to mitigate the 2-year 24-hour storm event and treat the stormwater runoff prior to discharging to the existing drainage channel at the north end of the project site. Refer to ***Figure 6, WQMP BMP Map***. Therefore, the expansion of off-site storm drain facilities would not be required to serve the project. Impacts would be less than significant. *Wastewater Treatment* The project is located within the jurisdiction of the Santa Ana RWQCB, which applies requirements to the wastewater treatment facilities owned and operated by treatment providers. Sewer service is available from existing sewer lines in Box Springs Road. A sewer line would be installed throughout the project in conveying wastewater to a point of connection with the existing sewer line on Box Springs Road. Therefore, the expansion of off-site wastewater facilities would not be required to serve the project. **Impacts would be less than significant.**				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Response: Less than Significant Impact. The proposed project would result in an increased demand for water supplies from the development of 139 multi-family residential units. To provide a conservative estimate of project water use, a generation rate derived from the most recent (2020) EMWD Urban Water Management Plan (UWMP) of 176 gallons per capita per day was used to estimate water demand from the project.[35] As described in Section 4.14, *Population and Housing*, the project would result in 505 additional residents at full occupancy. Based on EMWD's 2020 water use target of 176 gallons per capita per day, the 505 additional residents would generate a water demand of 88,880 gallons per day. Using this water demand rate, the project would result in an increase in water demand of 88,880 gallons per day, equivalent to approximately 99.6 acre-feet per year (AFY).

Water service would be provided to the project site by EMWD, which receives its water from potable groundwater wells, treated water from two desalination plants, imported water from the Metropolitan Water District (MWD) of Southern California, and imported water from other agencies. The imported water that EMWD receives from MWD is treated at two treatment plants: Henry J. Mills (Mills) in Riverside and Robert A. Skinner (Skinner) in Winchester. At Mills, State Water Project (SWP) water is treated, while at Skinner a combination of SWP water and Colorado River Aqueduct (CRA) water is treated. Untreated water supplied by MWD is treated by EMWD at a microfiltration plant in Perris. An additional microfiltration plant is located in Hemet, which provides untreated MWD water directly to a number of agricultural and wholesale customers. EMWD is increasing the use of recycled water, through expansion and maximization of the four regional water reclamation facilities.

As set forth in the EMWD's most recent UWMP, EMWD anticipates that its water supply will increase from 160,800 AF in 2025 to 181,800 AF in 2045 (an increase of 21,000 AF) to meet EMWD's anticipated growth in water demands through 2045. This conclusion is based on the assurances of MWD that it would be able to supply member agency demands, the reliability of local groundwater supplies achieved through groundwater management plans and the development of recycled water resources. In addition, the receipt of a "will serve" letter from EMWD; payment of standard water connection fees; and payment of ongoing user fees would ensure that the project's impacts on existing water facilities are adequately offset. **Therefore, this impact would be less than significant.**

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

Response: Less than Significant Impact. Wastewater disposal is regulated under the federal Clean Water Act and the State Porter-Cologne Water Quality Control Act. The Santa Ana RWQCB regulates wastewater discharges in Moreno Valley, including the project site, and implements the Clean Water Act and the Porter-Cologne Act by administering the NPDES, issuing water discharge permits, and establishing BMPs. The proposed project would receive wastewater conveyance services from EMWD. Municipal wastewater is delivered to one of EMWD's five regional water reclamation facilities which treat 46 million gallons of wastewater per day (MGD) and currently treats approximately 43 MGD of wastewater at its four active regional water reclamation facilities.[36]

Given the available capacities at EMWD wastewater treatment plants, it is anticipated that the EMWD has available capacity to accommodate the anticipated wastewater generated from the new residences

[35] Eastern Municipal Water District, 2020 Urban Water Management Plan, Table 5-1, p. 5-2.

[36] Eastern Municipal Water District website. https://www.emwd.org/wastewater-service Accessed February 6, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
developed onsite. Based on EMWD's 2015 Wastewater Collection System Master Plan, EMWD's wastewater generation criteria used for regional planning is a rate of 235 gallons per day (GPD) per residential unit. Therefore, the project would generate approximately 32,900 GPD.[37] The project, therefore, would generate about 32,900 gallons of wastewater per day (GPD) or 0.027 MGD. Since the project would only result in an increase of wastewater flows equal to 0.07 percent of current EMWD capacity,[38] adequate capacity is available to serve the proposed project. In addition, the receipt of a "will serve" letter from EMWD; payment of standard wastewater connection fees; and payment of ongoing user fees would ensure that the project's impacts on existing wastewater facilities are adequately offset. **Therefore, this impact would be less than significant.**				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
Response: Less than Significant Impact. Implementation of the project is anticipated to generate additional solid waste during the temporary, short-term construction phase, as well as the operational phase, but it would not be expected to result in inadequate landfill capacity. According to both the City's 2006 and 2040 General Plans, the majority of solid waste generated within the City is disposed of at Badlands Sanitary Landfill, located at 31125 Ironwood Avenue in Moreno Valley. Two other landfills within the county of Riverside, El Sobrante Landfill and Lamb Canyon Landfill, also have the capacity to serve the City. According to the California Department of Resources Recycling and Recovery (CalRecycle), the combined remaining capacity of these three landfills is approximately 178.8 million cubic yards.[39] CalRecycle's residential waste generation rates estimate a generation rate for 12.23 pounds of waste per household per day. Assuming 139 households, the project would result in 1,712.2 pounds of waste daily.[40] Considering the capacity of the above-mentioned landfills, solid waste generated by the proposed project could be accommodated by the landfills and would not have a significant impact on local landfill capacity. All project construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The project would also be required to demonstrate compliance with the Green Building Code, which includes design and construction measures that act to reduce construction-related waste though material conservation measures and other construction-related efficiency measures. **Compliance with these programs would ensure the project's construction-related solid waste impacts are less than significant.**				

[37] Based on 139 units x 235 daily gallons per unit = 32,900 gallons daily.

[38] Based on 32,900 gallons per day demand ÷ 43,000,000 gallons per day capacity = 0.07 percent.

[39] California Department of Resources Recycling and Recovery website. n.d. SWIS Facility Detail. https://www2.calrecycle.ca.gov/SolidWaste/ Accessed February 6, 2025.

[40] California Department of Resources Recycling and Recovery website. n.d. Estimated Solid Waste Generation Rates – Residential Sector Generation Rates. https://www2.calrecycle.ca.gov/wastecharacterization/general/rates Accessed February 6, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Response: Less than Significant Impact. Refer to Response 4.XIX(d). The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. As such, the project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. **A less than significant impact would occur.**

MITIGATION MEASURES

None required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Conservation Element – Section 2.4 – Utilities
   - Chapter 6 – Safety Element – Section 6.7 – Water Quality
   - Chapter 7 – Conservation Element – Section 7.3 – Solid Waste
   - Chapter 7 – Conservation Element – Section 7.5—Water Resources
     - Figure 7-1 – Water Purveyor Service Area Map
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.7 – Hydrology and Water Quality
     - Figure 5.7-1 – Strom Water Flows and Major Drainage Facilities
     - Figure 5.7-2 – Groundwater Basins
   - Section 5.13 – Public Services
     - Figure 5.13-1 – Locations of Public Facilities
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Chapter 8.10 Stormwater/Urban Runoff Management and Discharge Controls
5. Moreno Valley Municipal Code Section 8.21.170 National Pollutant Discharge Elimination System (**NPDES**).
6. Moreno Valley Municipal Code Chapter 8.80 – Recycling and Diversion of Construction and Demolition Waste

XX. **WILDFIRE –** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **would the project:**				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Response: No Impact. The project site is located in a moderately developed urban area surrounded by residential and commercial uses. According to the CalFire Fire Hazard Severity Zone Viewer,[41] the project site is located in zones designated as a Very High, High and Moderate Fire Hazard Severity Zone. The proposed project would be required to comply with the provisions of the City of Moreno Valley Emergency

[41] CalFire. nd. Fire and Resource Assessment Program: FHSZ Viewer Compare old and new LRA FHSZ | Fire Hazard Severity Zone and Local PIO Viewer App. Accessed May 07, 2025.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Operations Plan, Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan, and the emergency access requirements of the California Fire Code, which include but are not limited to providing access with adjoining uses and providing suitable access for emergency vehicles. In addition, emergency access to the site would be maintained during construction. In the event of a wildfire emergency, shelter-in-place at this location in the planned structures will also be an option available. A shelter-in-place plan will be prepared and provided by the HOA to all on-site personnel and residents outlining the actions to take if a shelter-in-place notification is provided by emergency management sources. **Therefore, no impact would occur.**				
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
Response: No Impact. The project site is generally flat and does not support areas of steep slopes. In addition, the project site is located within an urbanized area of the city, where the risk of wildland fire is decreased. As such, the proposed project would not be located in a critical fire danger zone or adjacent to wildlands subject to wildfires. Urban levels of fire protection would be provided to the project area. In addition, the project would adhere to building codes and any conditions included through review by the MVFD. **No impact would occur.**				
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
Response: No Impact. The project site is located in a moderately developed area of the city and is situated within close proximity to existing electric power, natural gas, and telecommunications facilities. The proposed residential uses on-site would not include any features that would have the potential to exacerbate fire risk or result in temporary or ongoing impacts to the environment. The project would provide access to adjoining uses and suitable access for emergency vehicles. Emergency access to the site would be maintained during construction. In addition, the project buildings will be constructed of ignition-resistant materials which are highly resistant to heat (Dudek 2025). **No impact would occur.**				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
Response: No Impact. The project site is relatively flat with no major changes in elevation. There are no channels or creeks running through the project site. The project site is not located within a flood hazard area. In addition, there are no known landslides at the project site, nor is the site in the path of any known or potential landslides. Therefore, the project would not expose people or structures to risks involving flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. **No impact would occur.**				
MITIGATION MEASURES None required.				
Sources:				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. Moreno Valley General Plan, adopted July 11, 2006 • Chapter 6 – Safety Element – Section 6.2- Fire and Emergency Services – 6.2.8—Wildland Urban Interface 2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006 • Section 5.5 – Hazards and Hazardous Materials - Figure 5.5-2 – Floodplains and High Fire Hazard Areas 3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code 4. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, amended 2017, http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf • Chapter 5 – Wildland and Urban Fires - Figure 5-2 – Moreno Valley High Fire Area Map 2016 • Chapter 8 – Landslide - Figure 8-1 – Moreno Valley Slope Analysis 2016 5. Emergency Operations Plan, City of Moreno Valley, March 2009, http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf • Threat Assessment 3 – Wildfire 6. *Fire Protection Plan*, prepared by Dudek, dated September 2025, and as provided as **Appendix 9** of this IS/MND.				
XXI.MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
Response: Less than Significant Impact with Mitigation Incorporated. As discussed in Section 4.IV, *Biological Resources*, after implementation of **Mitigation Measures BIO-1** through **BIO-4**, the proposed project would result in less than significant impacts to biological resources. **Similarly, as discussed in Sections 4.V, *Cultural Resources*, Section 4.VII, *Geology and Soils*, and Section 4.XVIII, *Tribal Cultural Resources*, after implementation of Mitigation Measures GEO-1 and TCR-1 through TCR-9, the proposed project would result in less than significant impacts to human remains, archaeological resources, paleontological resources, and tribal cultural resources.**				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)?	☐	☒	☐	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Response: Less than Significant Impact with Mitigation Incorporated. A significant impact may occur if the project, in conjunction with related projects proposed for development in the City, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. When considering the proposed project in combination with other past, present, and reasonably foreseeable future projects in the vicinity of the project site, the proposed project does not have the potential to cause impacts that are cumulatively considerable. As detailed in the above discussions, the proposed project would not result in any significant and unmitigable impacts in any environmental categories. **In all cases, the impacts associated with the project are limited to the project site or are of such a negligible degree that they would not result in a significant contribution to any cumulative impacts.**				
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐
Response: Less than Significant Impact with Mitigation Incorporated. The proposed project does not have the potential to cause substantial adverse effects to humans, either directly or indirectly, once mitigation measures are implemented. While a number of the proposed project's impacts were identified as having the potential to significantly impact humans, with implementation of the identified mitigation measures herein, and standard requirements, these impacts would be less than significant. **Therefore, the proposed project would not cause significant adverse direct or indirect impacts to humans.**				

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