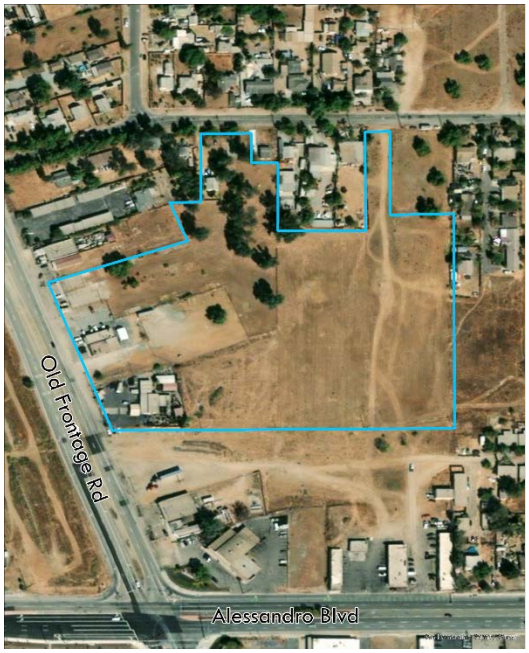
CITY OF MORENO VALLEY

INITIAL STUDY FOR
Old 215 Industrial Business Park Project



OLD 215 INDUSTRIAL BUSINESS PARK PROJECT
PEN21-0105, PEN21-0106, PEN21-02017,
PEN21-0108, PEN21-0109, PEN21-0110

February 22, 2022

Lead Agency
CITY OF MORENO VALLEY
14177 Frederick Street
Moreno Valley, CA 92552

Prepared By
EPD Solutions, Inc.
2 Park Plaza, Ste. 1120
Irvine, CA 92614
(949)794-1180

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INITIAL STUDY (IS) FOR
Old 215 Industrial Business Park

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** PEN21-0105, PEN21-0106, PEN21-02017, PEN21-0108, PEN21-0109, PEN21-0110

2. **Project Title:** Old 215 Industrial Business Park

3. **Public Comment Period:** February 22, 2022 to March 14, 2022

4. **Lead Agency:** City of Moreno Valley
   Luis Lopez, Planning Division
   14177 Frederick Street
   Moreno Valley, CA 92553
   (951) 413-3206
   luisl@moval.org

5. **Documents Posted At:** http://www.moval.org/cdd/documents/about-projects.html

6. **Prepared By:** Konnie Dobreva, J.D.
   Meaghan Truman
   EPD Solutions, Inc.
   2 Park Plaza Ste. 1120
   Irvine, CA 92614
   (949) 794-1180
   konnie@epdsolutions.com

7. **Project Sponsor:**

   Applicant/Developer
   Phelan Development
   450 Newport Center Drive, Ste. 405
   Newport Beach, CA 92660
   (949)531-6627
   kdearmey@phelandevco.com

8. **Project Location:**

The proposed Project site is located within the western portion of the City of Moreno Valley, directly east of the city boundary with City of Riverside, comprising ten parcels south of Bay Avenue and east of the Old 215 Frontage Road. The Project site is within the March Air Reserve Base Airport Influence Area. Regional access to the Project site is provided by Interstate 215 (I-215) and the Interstate 215 Alessandro Boulevard exit. Local access to the site is provided from Alessandro Boulevard, which is an urban arterial, the Old 215 Frontage Road, which is a secondary roadway, and Bay Avenue. The Project site and surrounding area is shown in Figure 1, *Regional Location,* and Figure 2, *Local Vicinity*.

The Project site comprises ten parcels encompassing approximately 11.46 acres. These parcels are identified as Riverside County Assessor's Parcel Numbers (APNs), as described in Table 1, and are shown in Figure 3, *Project Parcels.*

Table 1: Project Parcels and Existing Conditions

Assessor's Parcel Number (APN)	Existing Condition
263-230-002 263-220-018 263-220-017	Vacant yet disturbed land
263-220-023	Partially developed with a single-family residence
263-220-009	Partially developed with a commercial building
263-220-004	Vacant and partially developed with a paved parking lot
263-220-028	Developed with an American Legion Building
263-220-008 263-220-027 263-220-029	Owned by American Legion and utilized as a dirt parking lot

The site is relatively flat with a gentle slope in the southerly direction. The Project site contains multiple ornamental trees, including eucalyptus, and moderate vegetation consisting of grasses and weeds. The Project site's existing conditions are shown in Figure 4, *Aerial,* and Figure 5, *Site Photos*.

9. **General Plan Designation:** Business Park/Light Industrial (BP)

The primary purpose of areas designated Business Park/Industrial is to provide for manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities. The zoning regulations shall identify the particular uses permitted on each parcel of land. Development intensity should not exceed a Floor Area Ratio of 1.00 and the average floor area ratio should be significantly less.

10. **Specific Plan Name and Designation:** N/A

11. **Existing Zoning:** Business Park (BP)

According to Moreno Valley Municipal Code Section 9.05.020, the primary purpose of the Business Park (BP) zoning district is to provide for light industrial, research and development, office-based firms and limited supportive commercial in an attractive and pleasant working environment and a prestigious location. This district is intended to provide a transition between residential and other sensitive uses and more intense industrial and warehousing uses.

12.**Surrounding Land Uses and Setting:**	**Land Use**	**General Plan**	**Zoning**
Project Site	**Parcels 263-230-002, 263-220-018, and 263-220-017 are vacant yet disturbed land. Parcel 263-220-023 is mostly developed with a large lot single-family residence. Parcel 263-220-009 is developed with a commercial building and 263-220-004 is vacant and partially developed with a parking lot.**	**Business Park/Light Industrial (BP)**	**Business Park (BP)**
North	Single-family residences followed by Bay Avenue and single-family residences.	Business Park/Light Industrial (BP)	Business Park (BP)
South	Mix of vacant land and commercial uses followed by Alessandro Boulevard.	Commercial (C)	Community Commercial (CC)
East	Mix of apartments, single family residences and vacant land.	Business Park/Light Industrial (BP) and Commercial (C)	Community Commercial (CC)
West	Mix of single-family residences, commercial, and vacant land followed by the Old 215 Frontage Road and commercial uses.	Business Park/Light Industrial (BP) followed by the City of Riverside Business/Office Park (B/OP)	Business (BP) followed by City of Riverside Business and Manufacturing Zone (BMP)

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

Project Description

Project Overview

The applicant for the proposed Project is requesting approval from the City of Moreno Valley to demolish the existing structures on the site and construct six (6) new warehouse buildings totaling 196,759 square feet (SF) with an associated car and truck parking lots, ornamental landscaping, perimeter masonry walls and on-site and off-site infrastructure. The proposed buildings would result in an FAR of 0.40. Figure 6, *Conceptual Site Plan,* illustrates the proposed site plan.

Project Features

Building Summary and Architecture

The Project includes a total of 196,759 SF of speculative warehouse space within six buildings, which range in size from 23,251 SF to 49,981 SF. Each building also includes office space, as summarized in Table 2.

Table 2: Building Summaries

Building Number	Office Space (SF)	Warehouse Space (SF)	Total Building Area (SF)
Building A	2,000	47,981	**49,981**
Building B	2,500	23,830	**26,330**
Building C	2,500	27,162	**29,662**
Building D	2,000	42,005	**44,005**
Building E	2,500	21,030	**23,530**
Building F	2,500	20,751	**23,251**

As shown in Figure 6, *Conceptual Site Plan,* all buildings would include ground floor office space and warehouse space. Building A would be in the center of the space, surrounded by drive aisles. Building B would be setback from adjacent properties to the north by 10 feet. Building C would be setback from adjacent properties to the north by 12 feet and adjacent properties to the east by 10 feet. Building D and E would be setback from adjacent properties to the south by 10 feet. Building F would be setback from adjacent properties to the south and east by 10 feet.

All buildings would be 38 feet in height, with the parapet extending to a maximum of 41 feet. See Figure 7, *Building A Elevations,* and Figure 8, *Building D Elevations.* Each building would include a 500 square foot exterior break area for employees.

Parking and Loading Dock Summary

The Project would provide 235 parking spaces, including 12 Americans with Disabilities Act (ADA) compliant spaces. All buildings would provide grade level truck doors for loading and unloading as summarized in Table 3.

Table 3: Building Loading Space Breakdown

Building Number	Dock Doors	Drive in Dock Doors	Trailer Parking Spaces
Building A	6	1	-
Building B	3	1	1
Building C	3	1	1
Building D	5	1	5
Building E	3	1	2
Building F	3	1	1

All building loading areas would be gated. Additional trailer spaces would be provided throughout the site, adjacent to the buildings and in a gated trailer parking and yard area with a 14-foot tall screen wall, and 8-foot high gated entries within the development. The Project would provide a total of 23 trailer parking spaces.

The Project would also improve the existing parking lot within the parcels owned by the American Legion (APNs 263-220-008, -027, -028, and -029), and create reciprocal access to the American Legion from the new driveways as shown in Figure 3, *Project Parcels*.

Landscaping and Fencing

The Project would include 14-foot high concrete/masonry walls along all Project boundaries and an 8-foot-high screening wall with sliding gate adjacent to the west of the Building B loading area. The Project would also include construction of a new retaining and screening wall in an L shape to screen Project buildings from the existing American Legion building.

The proposed Project includes approximately 50,402 SF of ornamental landscaping that would cover approximately 10.3 percent of the site, as shown in Figure 9, *Conceptual Landscape Plan*. Proposed landscaping would include 24-inch box trees, 15-gallon trees, various shrubs, and ground covers to screen the proposed buildings, infiltration/detention basin, and parking and loading areas from off-site viewpoints.

Access and Circulation

The Project would be accessed via two full access ingress and egress driveways on the Old 215 Frontage Road. An additional gated fire access would be provided from Bay Avenue, as shown on Figure 6, *Conceptual Site Plan.* Reciprocal access will be provided for the benefit of the American Legion property owners to allow continued access to the parking areas on the north and east sides of the existing American Legion building.

Infrastructure Improvements

Water and Sewer Improvements

The Project would include installation of onsite water lines that would either connect to a new, proposed 12-inch diameter water line in Bay Avenue or would install lateral(s) to a newly installed, existing water main in Old 215 Frontage Road. Off-site improvements would include replacement of a section of the water main line within the Bay Avenue right-of-way.

An onsite sewer system would be installed that would connect to the existing 8-inch diameter sewer line in the Old 215 Frontage Road.

Drainage Improvements

Runoff from off-site areas would be bypassed through the Project site via 8-inch and 12-inch storm drainpipes. Both bypass lines discharge into the existing 24-inch storm drains in the Old 215 Frontage Road right-of-way. A proposed underground storage basin of approximately 5,650 cubic feet with two modular wetland water quality treatment units would be located to the west of Building D, as shown on Figure 9, Conceptual Landscape Plan. Overflow from the underground storage basin would be discharged into the existing 24-inch storm strain in the Old 215 Frontage Road right of way.

Sidewalk and Street Improvements

The Project includes the construction of road-widening and connecting/transition pavement, new curb and gutter, sidewalks and related improvements along all the site frontage of Old 215 Frontage Road and Bay Avenue, including off-site improvements to the American Legion property frontage. Additionally, the Project would include improvements such as repaving work to the Old 215 Frontage right-of-way.

General Plan and Zoning

The Project site has a land use designation of Business Park/Light Industrial (BP) and zoning designation of Business Park (BP). The Project would provide light industrial and warehousing/distribution with office space as allowed by the General Plan and zoning designations.

Construction and Phasing

Construction is expected to occur over 18 months. Construction activities for the Project would occur over one phase and include demolition, site preparation, grading, building construction, paving, and architectural coatings. Grading work would consist of 24,000 cubic yards of cut and 24,000 cubic yards of fill. Earthwork is expected to balance onsite.

Pursuant to the Chapter 8.14.040 of the Moreno Valley Municipal Code, construction activities would be limited to between the hours of 7:00 a.m. to 8:00 p.m. Monday through Friday, excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturday, unless written approval is obtained from the City Building Official or City Engineer.

Operational Characteristics

The Project would operate as a business park. Typical operational characteristics include employees and customers traveling to and from the site, delivery of materials and supplies to the site, truck loading and unloading, and manufacturing activities. Operational activities would occur 24 hours a day, 7 days a week. Most customers would be expected to visit the site during typical work hours from 8:00 a.m. to 5:00 p.m. However, the majority of operational activities, including delivery of materials and supplies, truck loading and unloading, and manufacturing activities would occur 24 hours a day, 7 days a week.

Discretionary Approvals, Permits, and Studies

The following discretionary approval, permits, and studies are anticipated to be necessary for implementation of the proposed Project:

City of Moreno Valley

- Adoption of this Mitigated Negative Declaration
- Plot Plan Approval
- Lot Line Adjustment Approval
- Review and Approval by the Riverside County Airport Land Use Commission
- Approvals and permits necessary to execute the proposed Project, including but not limited to, demolition permit, grading permit, building permit, etc.

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 sent notices regarding the project to the following Native American tribes that may have knowledge regarding tribal cultural resources in the Project vicinity:

- Agua Caliente Band of Cahuilla Indians
- Cahuilla Band of Indians
- Desert Cahuilla Indians
- Los Coyotes Band of Cahuilla Mission Indians

- Morongo Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- Santa Rosa Band of Mission Indians
- Serrano Nation of Mission Indians
- Soboba Band of Luiseño Indians

The Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians requested consultation regarding the proposed Project. The consulting tribes consider the area sensitive for cultural resources as several sites are located nearby. Although no information for site specific tribal cultural resources was provided (and there are no known tribal cultural resources on or adjacent to the Project site), the consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented tribal cultural resources during construction. These mitigation measures are incorporated in this Initial Study.

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

    a. A National Pollutant Discharge Elimination System (NPDES) Permit from the Santa Ana Regional Water Quality Control Board (RWQCB)

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

    a. Air Quality, Greenhouse Gas, and Energy Impact Analysis

    b. Health Risk Assessment

    c. Biological Resources Assessment

    d. Historical Resource Assessment

    e. Cultural Resources Assessment

    f. Geotechnical Investigation

    g. Paleontological Resources Assessment

    h. Phase I Environmental Site Assessments

    i. Phase II Environmental Site Assessments

    j. Preliminary Water Quality Management Plan

    k. Preliminary Drainage Report

    l. Noise Impact Analysis

    m. Traffic Impact Assessment

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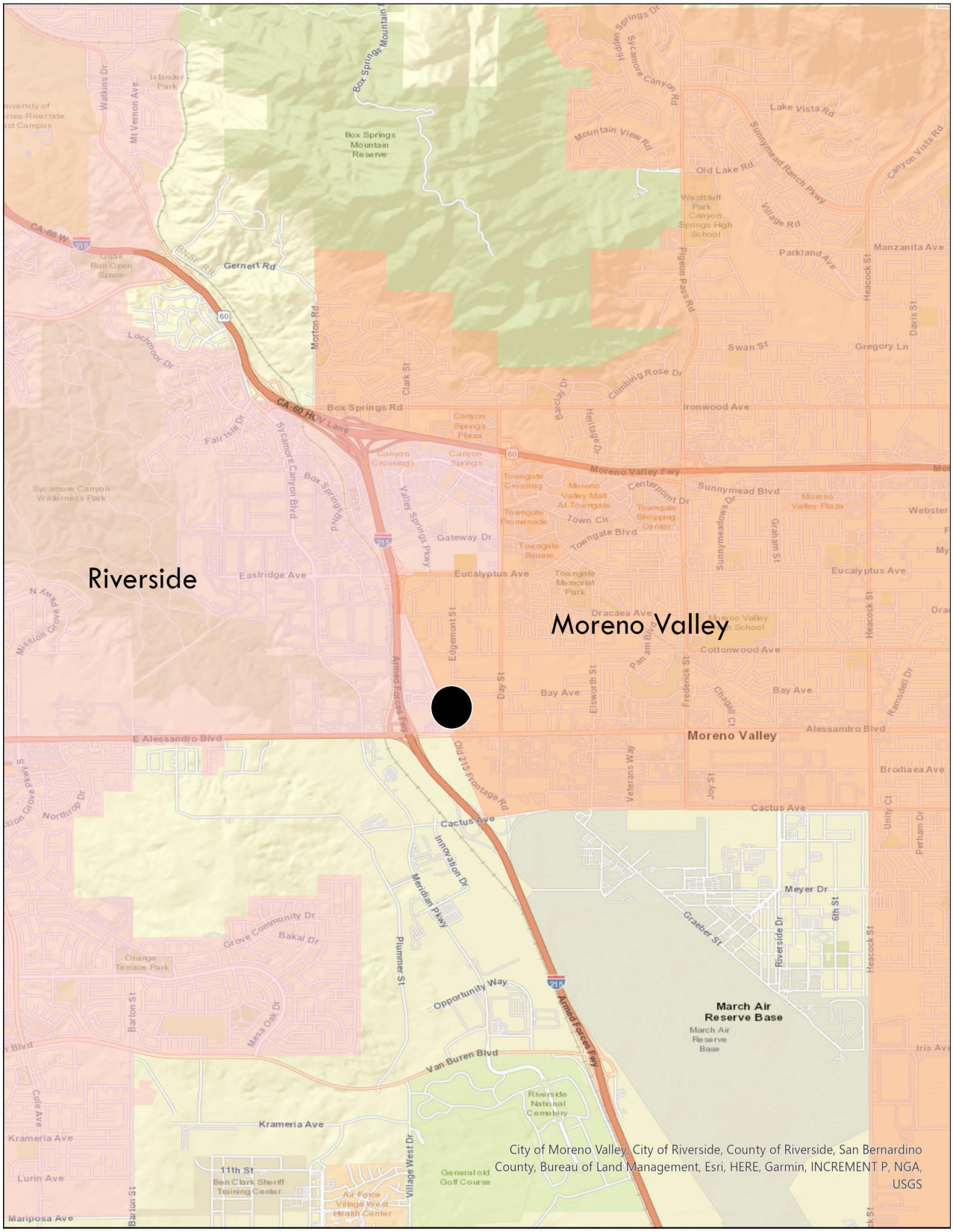
Regional Location



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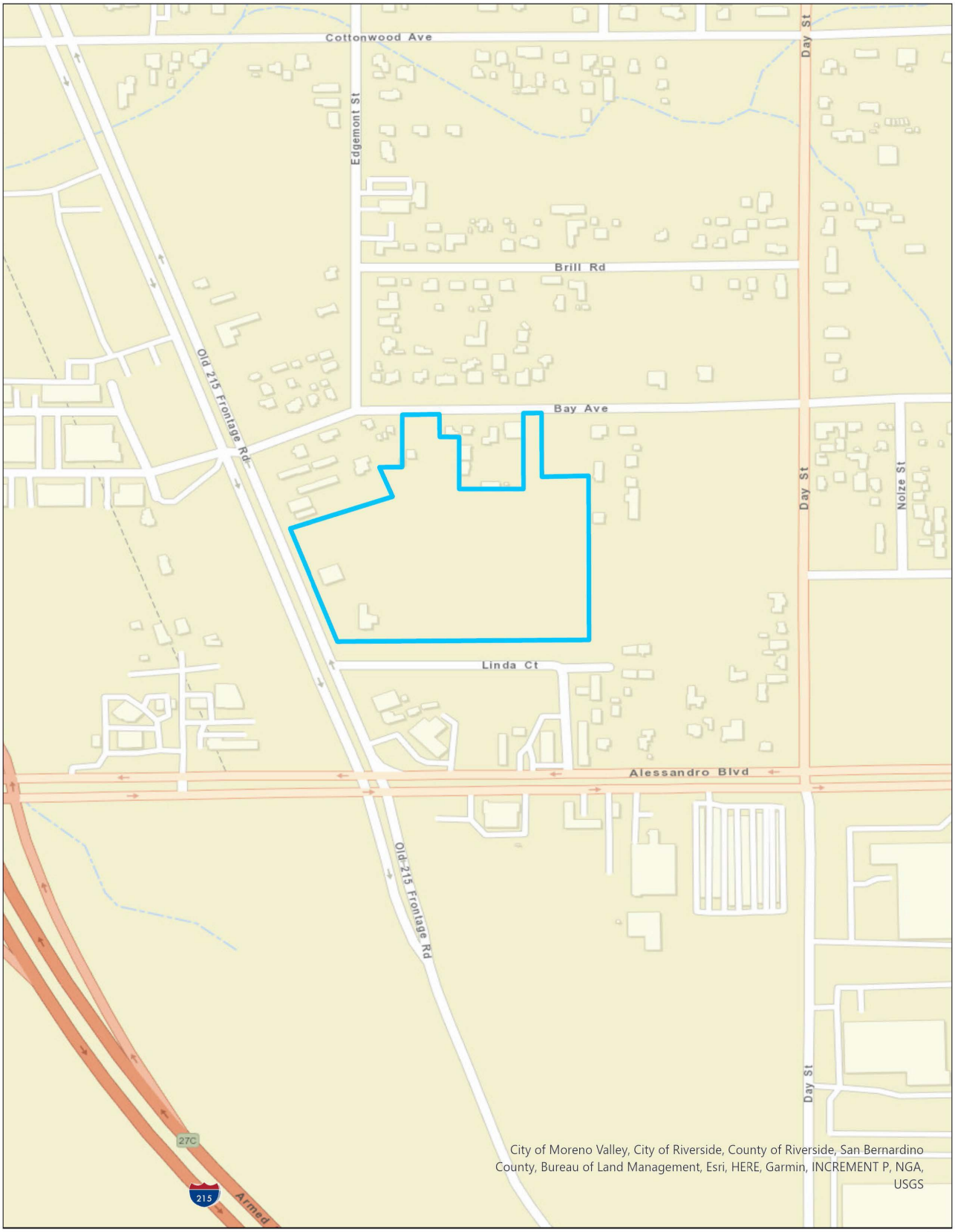
Local Vicinity



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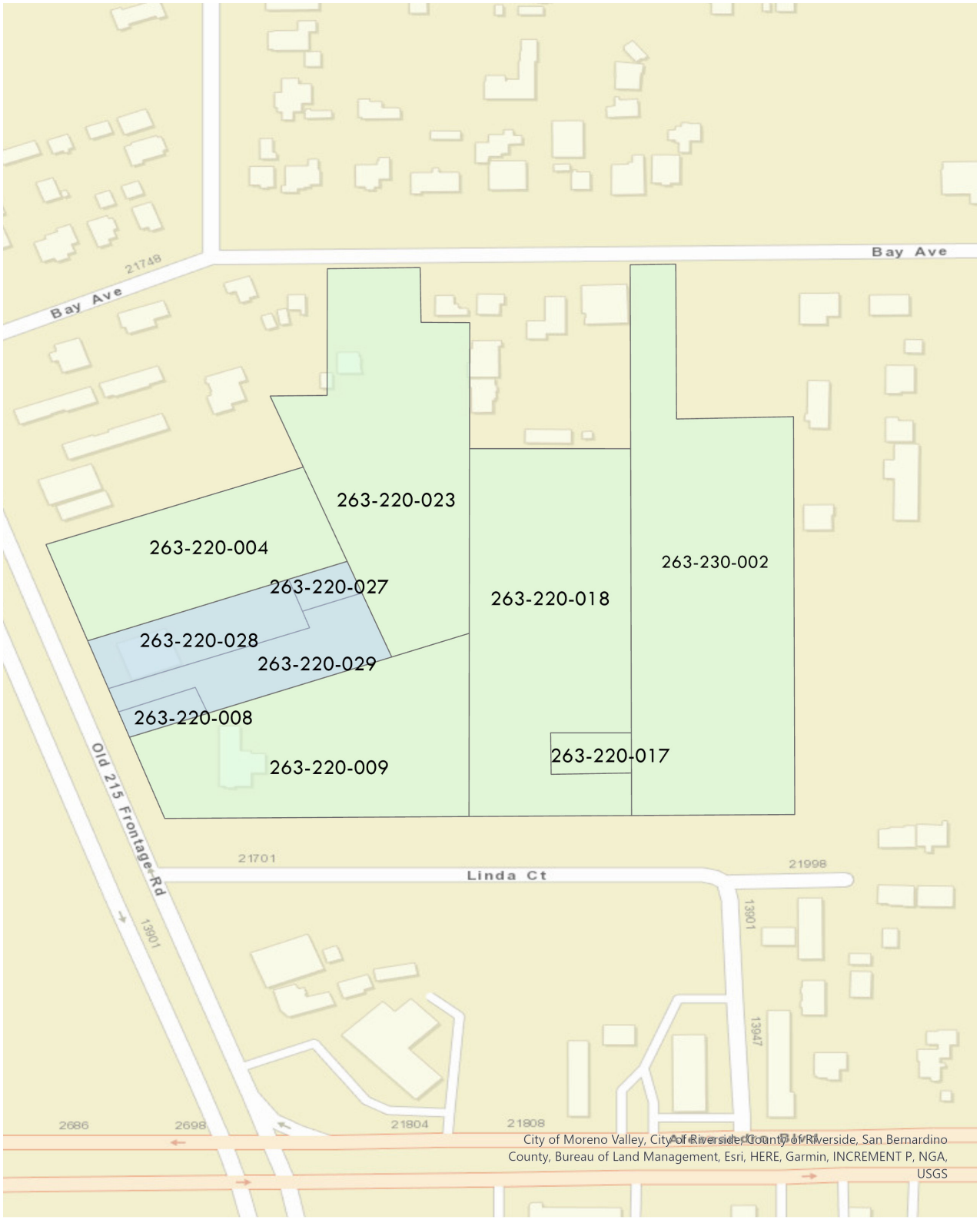
Project Parcels



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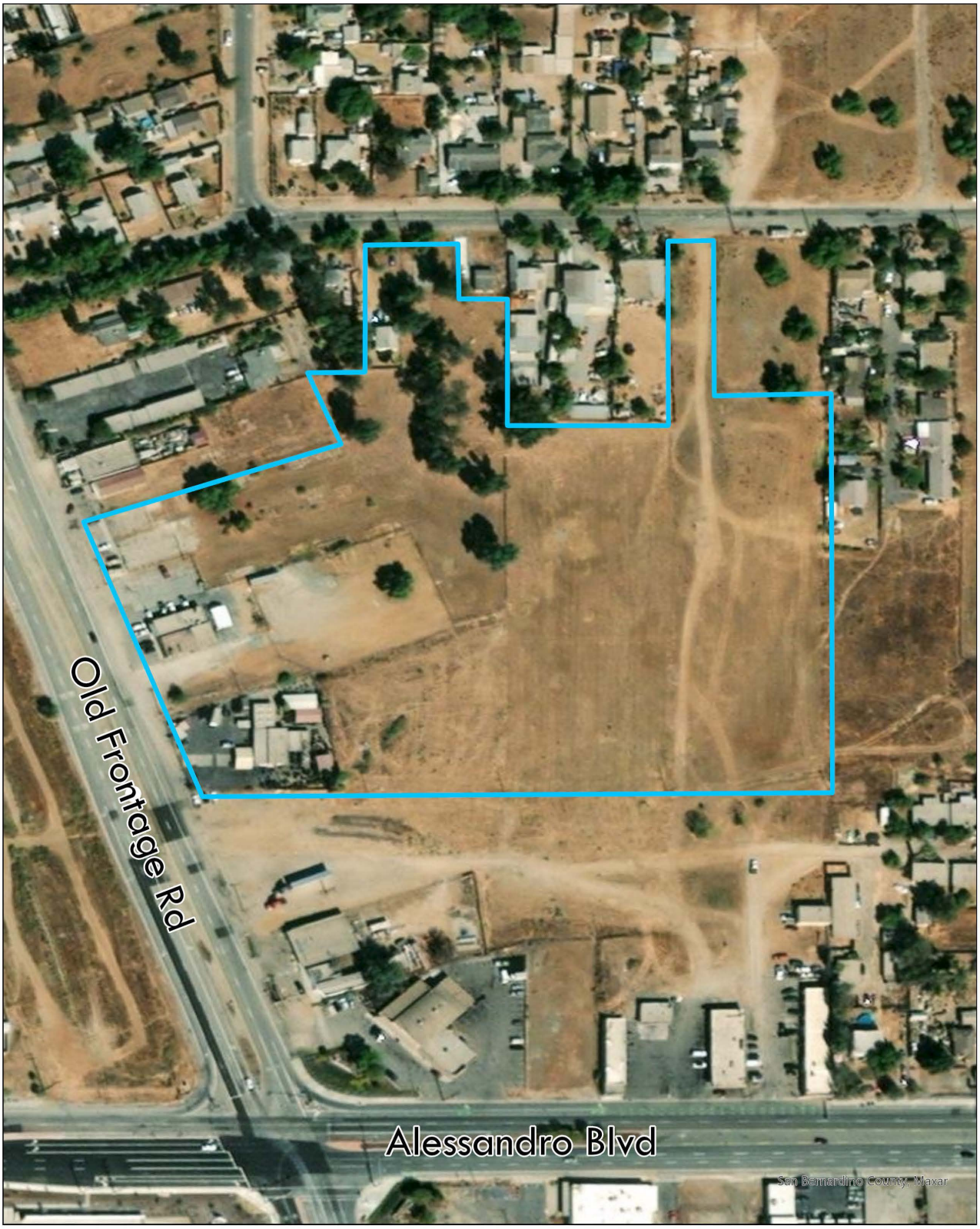
Aerial View


Old Frontage Rd
Alessandro Blvd
San Bernardino County, Maxar
Project Site
0
0.02
0.04 Miles
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Site Photos

View of southern portion of the site facing north.

View of the southern portion of the site facing west.

View of the western portion of the site facing east.

View of the western portion of the site facing northeast.

View of 21793 Bay Avenue.

View of American Legion building.

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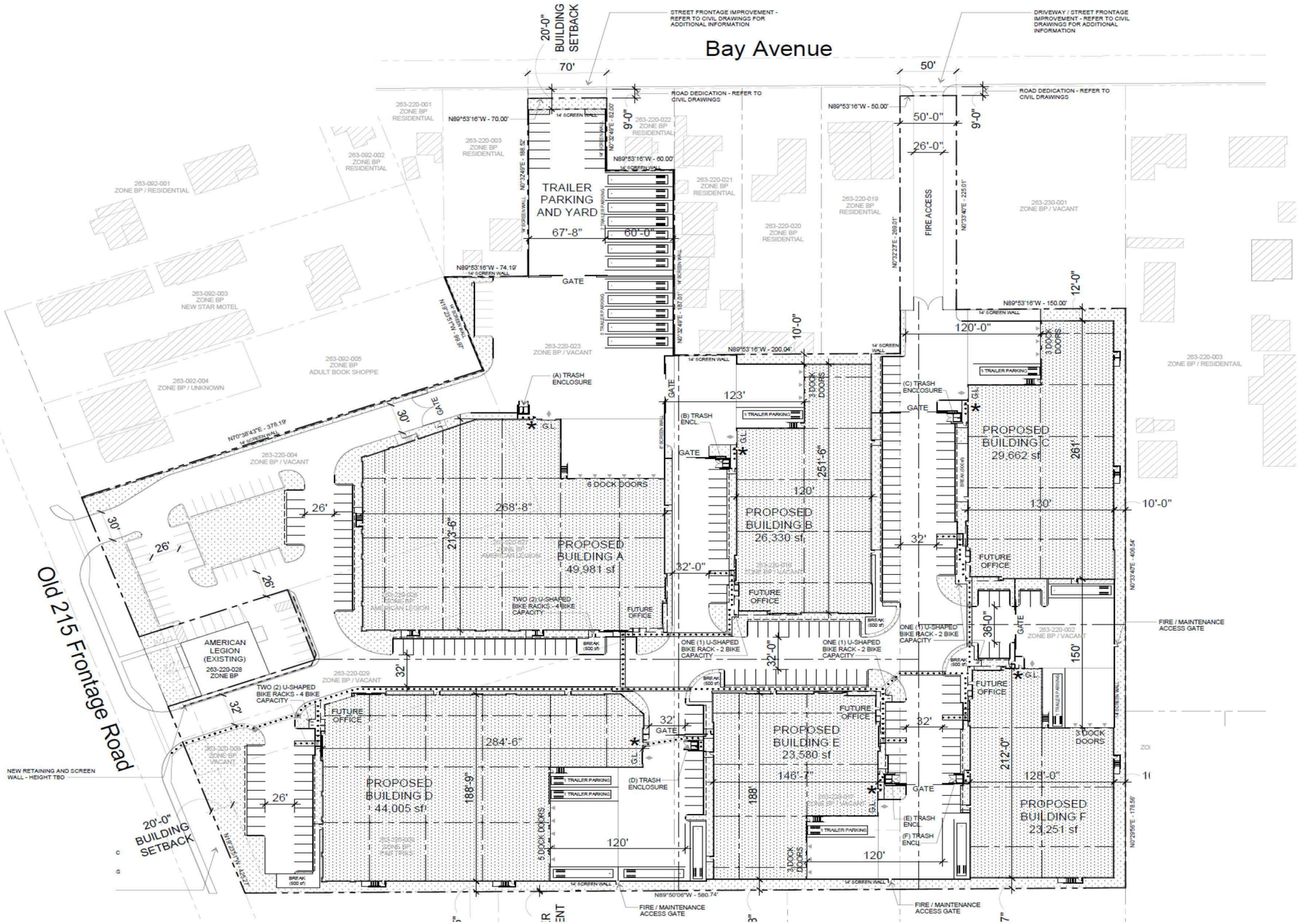
Conceptual Site Plan



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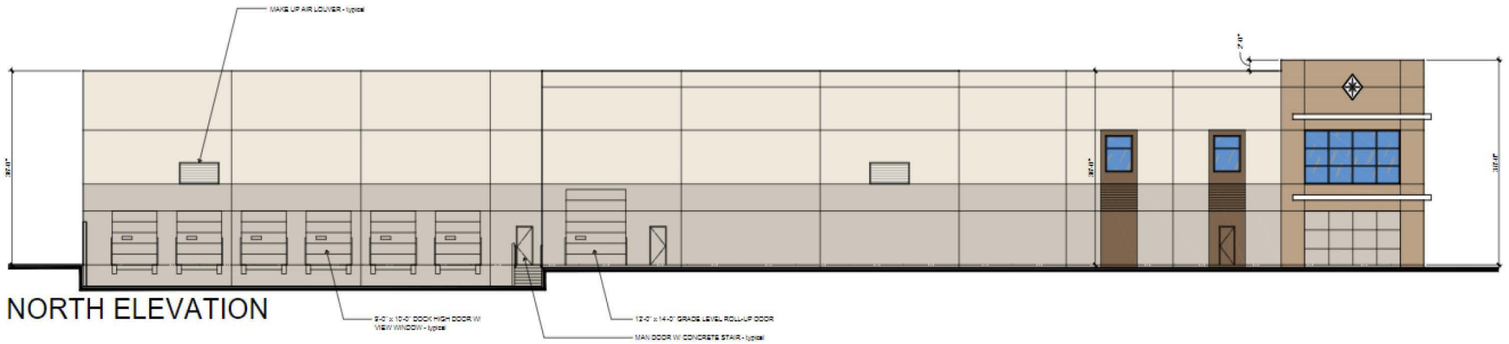
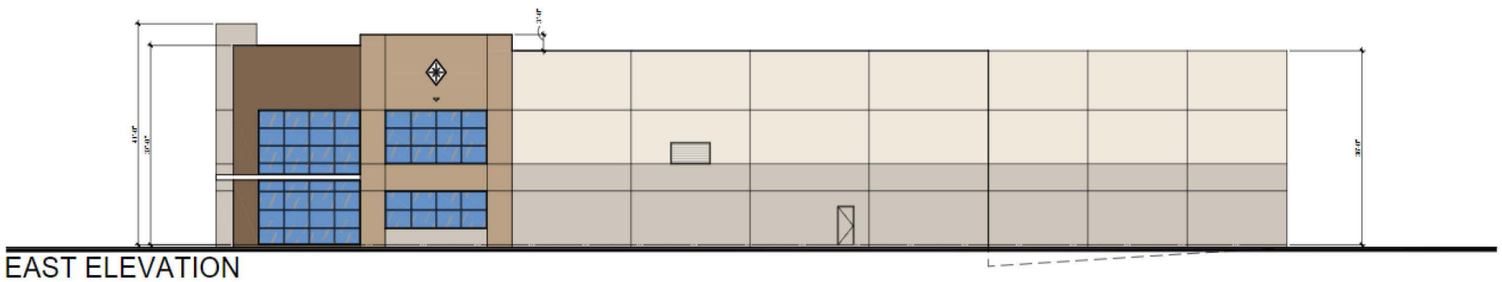
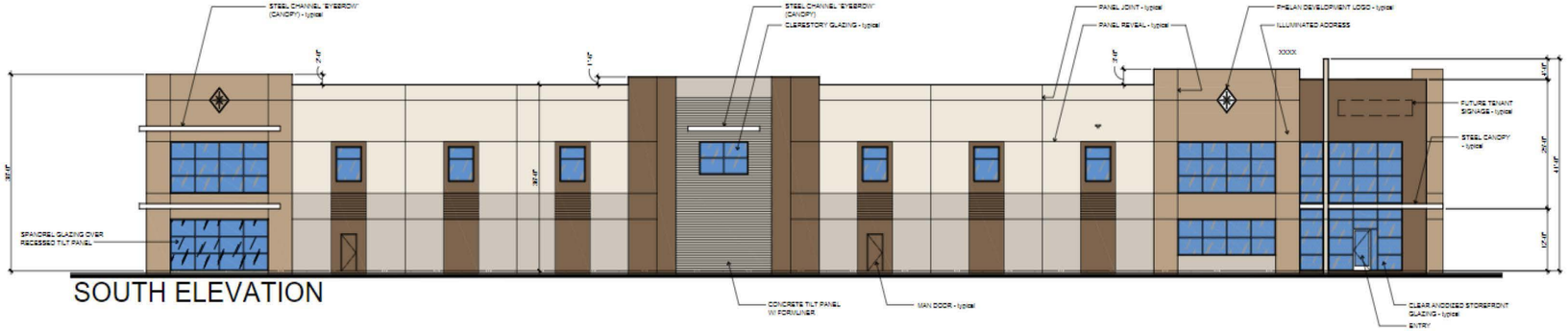
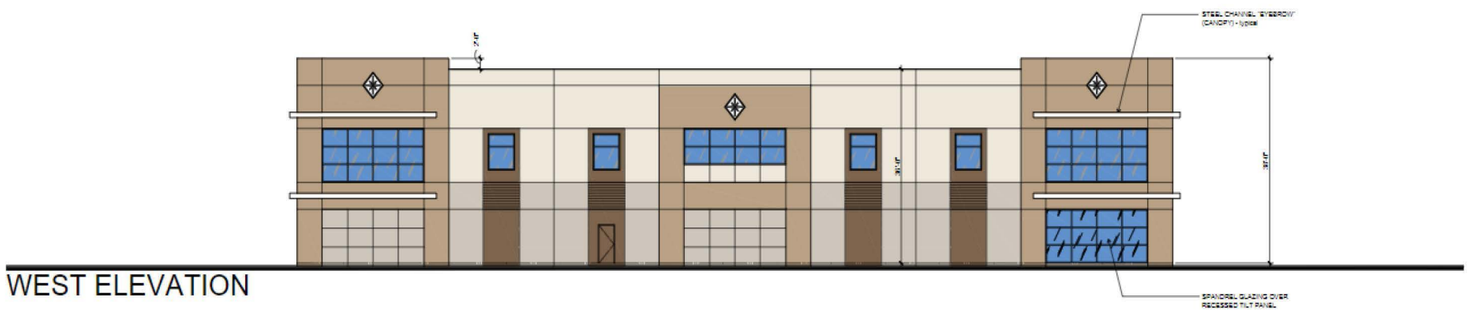
Building A Elevations









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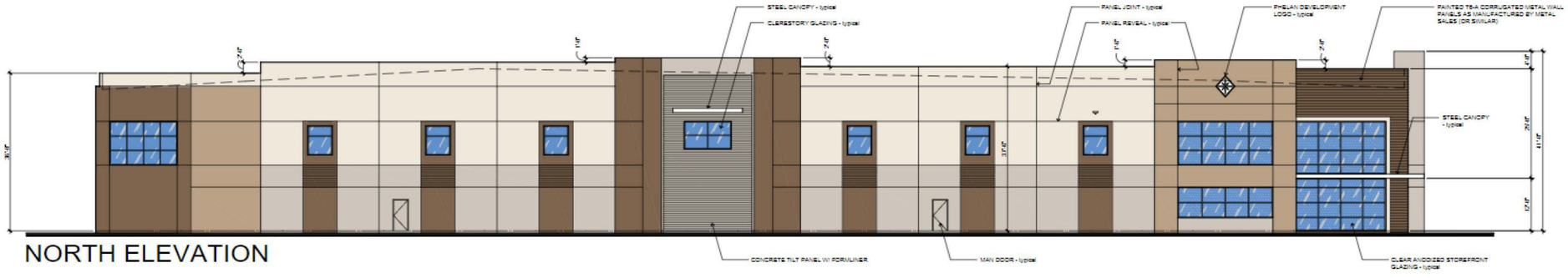
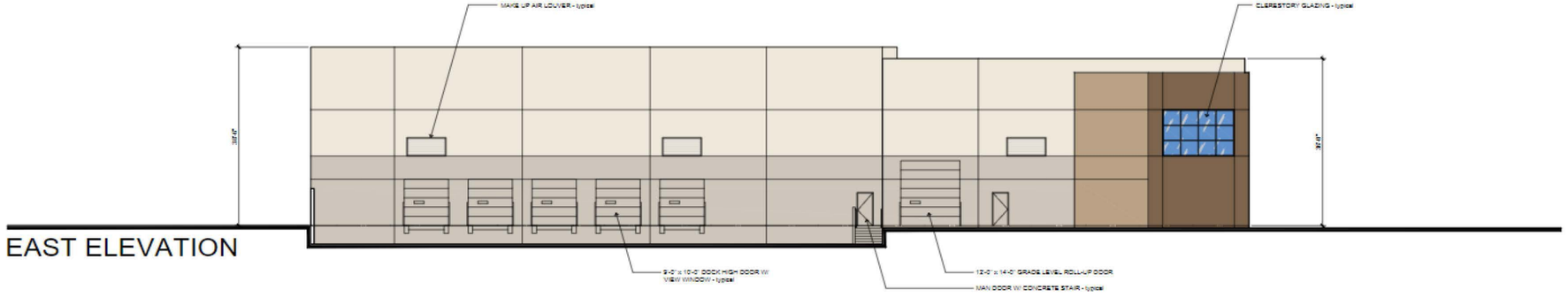
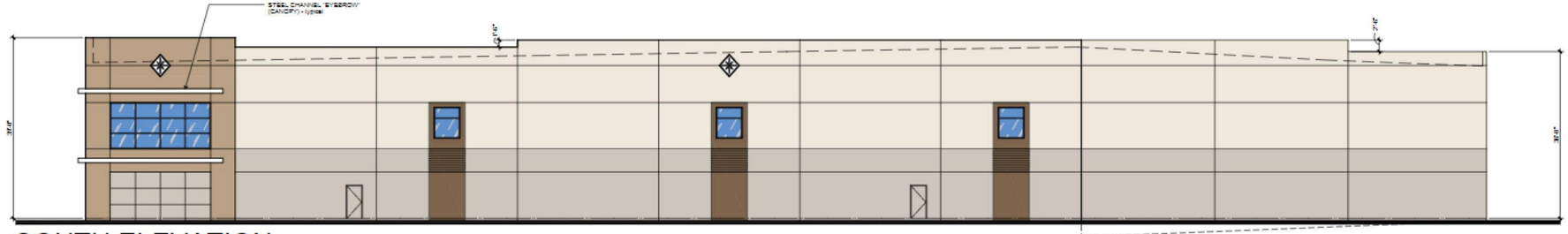
Building D Elevations



NORTH ELEVATION



EAST ELEVATION



SOUTH ELEVATION

WEST ELEVATION

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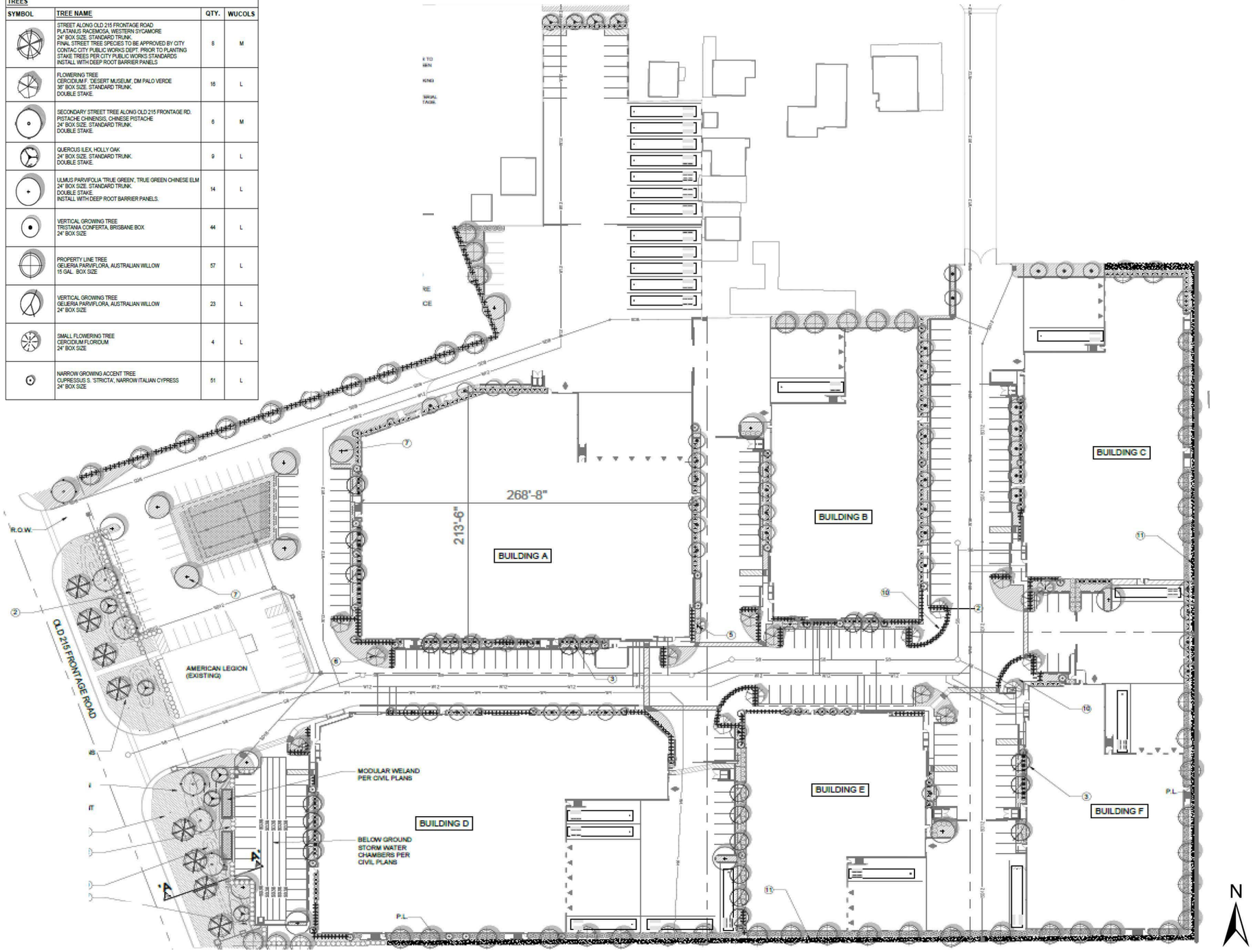
Conceptual Landscape Plan

TREES			
SYMBOL	TREE NAME	QTY.	WUCOLS
	STREET ALONG OLD 215 FRONTAGE ROAD PLATANUS RACEMOSA, WESTERN SYCAMORE 24" BOX SIZE. STANDARD TRUNK. FINAL STREET TREE SPECIES TO BE APPROVED BY CITY. CONTAC CITY PUBLIC WORKS DEPT. PRIOR TO PLANTING STAKE TREES PER CITY PUBLIC WORKS STANDARDS INSTALL WITH DEEP ROOT BARRIER PANELS	8	M
	FLOWERING TREE CERCIDIUM F. 'DESERT MUSEUM', DM PALO VERDE 36" BOX SIZE. STANDARD TRUNK. DOUBLE STAKE.	16	L
	SECONDARY STREET TREE ALONG OLD 215 FRONTAGE RD. PISTACHE CHINENSIS, CHINESE PISTACHE 24" BOX SIZE. STANDARD TRUNK. DOUBLE STAKE.	6	M
	QUERCUS ILEX, HOLLY OAK 24" BOX SIZE. STANDARD TRUNK. DOUBLE STAKE.	9	L
	ULMUS PARVIFOLIA 'TRUE GREEN', TRUE GREEN CHINESE ELM 24" BOX SIZE. STANDARD TRUNK. DOUBLE STAKE. INSTALL WITH DEEP ROOT BARRIER PANELS.	14	L
	VERTICAL GROWING TREE TRISTANIA CONFERTA, BRISBANE BOX 24" BOX SIZE	44	L
	PROPERTY LINE TREE GELIERIA PARVIFLORA, AUSTRALIAN WILLOW 15 GAL. BOX SIZE	57	L
	VERTICAL GROWING TREE GELIERIA PARVIFLORA, AUSTRALIAN WILLOW 24" BOX SIZE	23	L
	SMALL FLOWERING TREE CERCIDIUM FLORIDUM 24" BOX SIZE	4	L
	NARROW GROWING ACCENT TREE CUPRESSUS S. 'STRICTA', NARROW ITALIAN CYPRESS 24" BOX SIZE	51	L



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17. **Acronyms:**

ADA -	Americans with Disabilities Act
ALUC -	Airport Land Use Commission
ALUCP -	Airport Land Use Compatibility Plan
AQMP -	Air Quality Management Plan
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
RCFCWCD -	Riverside County Flood Control & Water Conservation District
RCP -	Regional Comprehensive Plan
RCTC -	Riverside County Transportation Commission
RCWMD -	Riverside County Waste Management District
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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐	Aesthetics	☐	Agriculture & 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 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" 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.

Luis Lopez
Signature

February 14, 2022
Date

City Project Planner
Printed Name

City of Moreno Valley
For

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. The Project site is partially developed with a single-family residence, commercial building, and parking lot. The majority of the Project site is vacant, yet disturbed land and the site is located in a developed area with multiple existing commercial and industrial developments. The General Plan Figure 7-2 shows that view corridors within the City of Moreno Valley include views of Box Springs Mountains, the Badlands, and Moreno Peak. The Project site is not located within a view corridor. The only views available in the area are long-range views of mountains available to pedestrians and motorists on Old 215 Frontage Road and Bay Avenue.

The proposed Project would result in the development of approximately 41-foot tall warehouse buildings. The Project applicant would develop the new warehouse buildings that would be set back from the adjacent streets and would not encroach into any existing long-distance views. Building B would be setback from adjacent properties to the north by 10 feet. Building C would be setback from adjacent properties to the north by 12 feet and adjacent properties to the east by 10 feet. Building D and E would be setback from adjacent properties to the south by 10 feet. Building F would be setback from adjacent properties to the south and east by 10 feet. Due to the lack of designated view corridors near the Project site and proposed setbacks, the Project would not impact any scenic vistas or protected viewsheds. Impacts 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. The Project site is partially developed with a single-family residence, commercial building, and parking lot and is not located near a State scenic highway. The closest designated State scenic highway is a portion of State Route 243, traveling from Mountain Center to Banning, which is located approximately 24 miles from the Project site. The nearest eligible scenic highway is State Route 38, travelling from Redlands to Mentone, approximately 11 miles from the Project site. Therefore, due to the distance of the Project site from either a designated or eligible state scenic highway, the proposed Project would not damage scenic resources within a state scenic highway and there would be no impacts.

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. The following regulatory standards are applicable to development of the Project site, and would ensure the preservation of visual character and quality through architecture, landscaping, and site planning:

City of Moreno Valley Municipal Code

The following provisions from the Municipal Code are intended to minimize adverse aesthetic impacts associated with new development projects and are relevant to the proposed Project.

- **Light and glare (9.10.110)**. Section 9.10.110 provides lighting standards for all zoning districts. The section requires that all lighting be designed to project downward and shall not create glare on adjacent properties.
- **Landscape and Irrigation Design Standards (9.17.030).** Section 9.17.030 provides landscape design standards and requires the use of drought tolerant plants, while ensuring an aesthetically pleasing landscape.

Analysis

The proposed Project would change the scenic quality of the site from a mostly undeveloped site and would construct six warehouse buildings totaling 196,759 SF, parking lot, ornamental landscaping, and associated infrastructure. The proposed buildings would result in a FAR of 0.40 and would be approximately 41 feet tall.

The Project site is within an urbanized area that is mostly developed with light industrial uses, commercial uses, and residential uses.

The Project would be consistent with applicable Municipal Code standards for the Business Park zoning district, as demonstrated below in Table AES-1.

Table AES-1: Business Park Development Standards

Municipal Code Standard		Project Consistency
Minimum Site Area	1 acre	11.46 acres
Minimum Front Building Setback	20 feet, landscaped	20-foot landscape setback to proposed parking along Old 215 Frontage and Bay Avenue
Minimum Interior Side Building Setback Area	On property line or a minimum of 3 feet	10 feet
Minimum Street Side Building Setback Area	20 feet	20-foot landscape setback to proposed parking along Old 215 Frontage and Bay Avenue
Minimum Rear Building Setback Area	On property line or a minimum of 3 feet	10 feet

As discussed above, in Tables AES-1, the proposed Project would not conflict with the regulations regarding aesthetics and scenic quality in the Moreno Valley Municipal Code. The new 41-foot-high industrial warehouse building would be set back from the adjacent streets and would not encroach into the existing public long-distance views. Trees would be installed pursuant to the City's standard requirements for landscape screening (as verified during the permitting process). Additionally, the layering of landscaping between the proposed building and the surrounding roadways would provide visual depth and distance between the roadways and proposed structure. As a result, the project would not result in the creation of an aesthetically offensive site open to public view. Therefore, while the proposed Project would change the visual character of the site, it would not substantially degrade the existing visual character or quality of its surroundings. 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:

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

Less than Significant. The proposed Project is proposing to demolish the existing commercial and single family residential uses onsite and develop the site with six warehouse buildings for a total of 196,759 SF, which would result in a FAR of 0.40. The proposed Project is located in a developed area alongside other industrial development. Building B would be setback from adjacent residential properties to the north by 10 feet. Building C would be setback from adjacent properties to the north by 12 feet and adjacent properties to the east by 10 feet. Building D and E would be setback from adjacent properties to the south by 10 feet. Building F would be setback from adjacent properties to the south and east by 10 feet. The Project would introduce new sources of nighttime light and glare into the area from parking lot lighting and outdoor security lighting. Spill of light onto surrounding properties and "night glow" would be reduced by using hoods and other design features on the light fixtures used within the proposed Project. Implementation of existing regulatory requirements per the City's Municipal Code Section 9.10.110 (Light and Glare), including regulations for outdoor lighting, would occur during the City's permitting process and would ensure that impacts related to light and glare are less than significant.

The proposed building materials do not consist of highly reflective materials, lights would be shielded consistent with the municipal code requirements, and the proposed landscaping along project boundaries would screen sources of light and reduce the potential for glare. The proposed Project would create limited new sources of light or glare from security and site lighting but would not adversely affect day or nighttime views in the area given the similarity of the existing lighting in the surrounding urban environment.

However, during Project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and the adjacent residences and motorists on adjacent roadways, such security lights may result in glare to residents and motorists. However, this potential impact would be reduced to a less than significant level through the City's standard project review and approval process. As such, impacts related to light and glare would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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
4. California State Scenic Highway System Map, California Department of Transportation. Accessed from:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983				
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), 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 Project site is partially developed with commercial buildings and one single-family residence. There are currently no agricultural activities within or adjacent to the Project site. The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. The Project site is designated as Business Park (BP)/Light Industrial by the Moreno Valley General Plan and is in the BP (Business Park) district of the Official Zoning Map, and impacts related to the conversion of Farmland would not occur from the proposed Project. As such, there would be no impact.				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
Response: **No Impact.** The Project site is not designated or zoned for agricultural use, used for agriculture, or subject to a Williamson Act contract. Therefore, redevelopment of the site for light industrial uses would not have an impact on agricultural zoning or a Williamson Act contract. As such, no impacts would occur.				
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 Project site is developed and located in an urbanized area of the City; there is no forest land or resources on or in proximity to the Project site. Additionally, the Project site is not designated or zoned for forest or timber land or used for foresting. Development of the proposed Project would not have an impact on forest land or resources. As such, no impacts would occur.				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Response:

No Impact. The Project site is located in a developed area of the City; there is no forest land in the vicinity of the Project site. Therefore, development of the proposed Project would not cause loss of forest land or convert forest land to non-forest use. No impact would occur to forest land or timberlands.

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. The proposed Project includes the demolition of the existing residential and commercial buildings and the construction of six new warehouses consistent with the land use designation and zoning of the Project site. There are currently no agricultural activities within or adjacent to the Project site. The Project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Development of the Project site would not convert farmland or forest land. Additionally, the Project site and its vicinity are designated as Urban and Built-Up Land, with some Farmland of Local Importance existing closer to the I-215. Based on the site location and its urban nature, the proposed Project would not, in and of itself, cause conversion of farmland or forest land as the proposed Project would be developed consistent with the intended uses designated in the Moreno Valley General Plan and Municipal Code, and there would be no impacts.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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
4. California Important Farmland Finder. California Department of Conservation. Accessed from: https://maps.conservation.ca.gov/DLRP/CIFF/

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. The Project site is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The current Air Quality Management Plan (AQMP) is the 2016 AQMP, adopted in March 2017. Criteria for determining consistency with the AQMP are defined in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). An Air Quality, Energy, and Greenhouse Gas Impact Analysis, dated August 2021, was

prepared for the proposed Project. The AQIA determined that the proposed Project would be consistent with the AQMP because it would not result in or cause California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) violations. Additionally, as substantiated by the Air Quality, Energy, and Greenhouse Gas Impact Analysis (Appendix A herein), demolition of the existing residential buildings and development of the proposed light industrial warehouse building that would be consistent with the land use and zoning designations of the site would not exceed the applicable SCAQMD regional or daily emissions thresholds. The proposed Project would also be consistent with the land use and development assumptions for the site as included in the Moreno Valley General Plan and Municipal Code. The Project would result in a FAR of 0.40, which is less than the allowable maximum FAR of 1.00 for the Business Park land use designation. Impacts 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. The South Coast Air Basin (SCAB), where the proposed Project is located and which is under SCAQMD jurisdiction, is in a non-attainment status for federal and state ozone standards and state and federal particulate matter standards. Any development in the Basin, including the proposed Project, could cumulatively contribute to these pollutant violations. Evaluation of cumulative air quality impacts of the proposed Project has been completed pursuant to SCAQMD's cumulative air quality impact methodology, SCAQMD states that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOx, PM_{10}, and $PM_{2.5}$) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of the criteria pollutant(s) for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. The methodologies from the SCAQMD CEQA Air Quality Handbook are used in evaluating Project impacts. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in Table AQ-1.

Table AQ-1: SCAQMD Regional Daily Emissions Thresholds

Pollutant	Construction (lbs/day)	Operations (lbs/day)
NOx	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SOx	150	150
CO	550	550
Lead	3	3

Source: Air Quality, GHG, Energy Impact Assessment (Appendix A)

Construction

Construction activities associated with the proposed Project would generate pollutant emissions from the following: (1) demolition of the existing structures and removal of the existing infrastructure and pavement, (2) site preparation, (3) grading, (4) building construction, (5) paving, and (6) architectural coating. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring.

It is mandatory for all construction Projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM_{10}, and $PM_{2.5}$ emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas.

Compliance with Rule 403, included as PPP AQ-1, was accounted for in the construction emissions modeling. In addition, implementation of SCAQMD Rule 1113, included as PPP AQ-2, which governs the VOC content in architectural coating, paint, thinners, and solvents was accounted for in construction emissions modeling. As shown in Table AQ-2, the CalEEMod results indicate that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds. Therefore, construction activities would result in a less than significant impact.

Table AQ-2: Project Construction Emissions and Regional Thresholds

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO_x	CO	SO_x	PM-10	PM-2.5
2022						
Demolition	2.7	27.0	21.5	0.0	2.4	1.4
Site Prep	4.5	50.5	20.7	0.1	10.9	6.1
Grading	4.4	47.6	30.0	0.1	6.1	3.3
Building Construction	2.8	21.0	27.0	0.1	3.8	1.6
Maximum Daily Emissions	4.5	50.5	30.0	0.1	10.9	6.1
2023						
Building Construction	2.5	18.8	26.1	0.1	3.7	1.5
Paving	1.8	10.2	15.1	0.0	0.7	0.5
Architectural Coating	63.6	1.8	4.0	0.0	0.6	0.2
Maximum Daily Emissions	63.6	18.8	26.1	0.1	3.7	1.5
Maximum Daily Emissions 2022-2023	63.6	50.5	30.0	0.1	10.9	6.1
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: EPD Solutions, 2021 (Appendix A).

Operation

Implementation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products. Operational vehicular emissions would generate a majority of the emissions from implementation of the Project. Operational emissions associated with the Project were modeled using CalEEMod and are presented in Table AQ-3. As shown, the proposed Project would

result in long-term regional emissions of criteria pollutants, however, these emissions would be below the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not exceed the NAAQS and CAAQS, would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be less than significant.

Table AQ-3: Project Operational Emissions and Regional Thresholds

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area	4.5	0.0	0.0	0.0	0.0	0.0
Energy	0.1	0.9	0.8	0.0	0.1	0.1
Mobile	1.6	23.4	21.6	0.2	10.4	3.0
Offroad	0.1	4.3	55.6	0.0	0.1	0.1
Stationary	2.3	6.5	6.0	0.0	0.3	0.3
Total Project Operational Emissions	8.6	35.1	84	0.2	10.9	3.5
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: EPD Solutions, 2021 (Appendix A)

c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

Response:

Less than Significant. The SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD 2008) recommends the evaluation of localized NO_2, CO, PM_{10}, and $PM_{2.5}$ construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. According to the SCAQMD's *Final Localized Significance Threshold Methodology*, "off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs" (SCAQMD 2008). SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NOx, CO, PM_{10}, and $PM_{2.5}$ pollutants for each of the 38 source receptor areas (SRAs) in the Basin. The City of Moreno Valley is located within SRA 24, Perris Valley.

Sensitive receptors can include residences, schools, playgrounds, childcare centers, and athletic facilities. For the purpose of LST analysis, the nearest sensitive receptors are existing residences are located adjacent to the Project site. The distance between the Project site boundary and the closest existing residential structure is approximately 8 feet north of the Project. The LST Methodology explicitly states that "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters (82 feet) to the nearest receptor should use the LSTs for receptors located at 25 meters." As the existing residence is located less than 25 meters from the Project site, the 25-meter receptor distance is used for evaluation of localized impacts.

Construction

Construction of the proposed Project may expose nearby residential sensitive receptors to airborne particulates as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement measures to reduce or eliminate emissions by following SCAQMD's standard construction practices, including a limitation of not actively grading more than 10 acres in one day. Further, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. SCAQMD Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. As shown in Table AQ-4, Project construction-source emissions would not exceed SCAQMD LSTs and impacts would be less than significant.

Table AQ-4: Localized Significance Summary of Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)			
	NO_x	CO	PM-10	PM-2.5
2022				
Demolition	25.7	20.6	2.0	1.3
Site Prep	50.4	20.0	10.7	6.0
Grading	47.5	29.2	5.9	3.2
Building Construction	16.8	17.4	0.9	0.8
Maximum Daily Emissions	50.4	29.2	10.7	6.0
2023				
Building Construction	15.4	17.3	0.7	0.7
Paving	10.2	14.6	0.5	0.5
Architectural Coating	1.7	2.4	0.1	0.1
Maximum Daily Emissions	15.4	17.3	0.7	0.7
Maximum Daily Emission 2022-2023	50.4	20.6	10.7	6.0
SCAQMD Significance Thresholds	236.7	1,345.7	11	6.7
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: EPD Solutions, 2021 (Appendix A)

Operation

Operation of the proposed Project would include emissions from vehicles traveling to the Project site and from vehicles in the parking lots and loading areas. As demonstrated in Table AQ-5, emissions would not exceed SCAQMD LSTs for operations, and impacts would be less than significant.

Table AQ-5: Localized Significance Summary of Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Area	0.0	0.0	0.0	0.0
Energy	0.9	0.8	0.1	0.1
Mobile	2.3	4.5	0.1	0.0
Offroad	4.3	55.6	0.1	0.1
Stationary	6.5	6.0	0.3	0.3

Total Project Operational Emissions	14	66.9	0.6	0.5
SCAQMD Significance Thresholds	270	1,577	4	2
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: EPD Solutions, 2021 (Appendix A)

Diesel Mobile Source Health Risk Analysis. A Health Risk Assessment (HRA), included as Appendix B, was prepared to evaluate the health risk impacts as a result of exposure to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks entering and leaving the site during operation of the proposed industrial uses. DPM has been identified by the California Air Resources Board (ARB) as a carcinogenic substance responsible for nearly 70 percent of the airborne cancer risk in California. The estimated health risk impacts were compared to the health risk significance thresholds recommended by the SCAQMD for use in CEQA assessments.

To evaluate DPM emissions vehicles were assumed to depart both driveways on Old Frontage Road and head north to Eucalyptus Avenue then east to the I-215. Vehicles were assumed to travel from the I-215 to Alessandro Boulevard, north on Old Frontage Road and enter both driveways on Old Frontage Road. For the purpose of the Health Risk Assessment, the nearest sensitive receptor are existing residences adjacent to the trailer parking yard at the northern portion of the Project site and to the north of the property across Bay Avenue. The nearest worker receptors are located in the industrial building adjacent to the northern boundary of the Project, as shown on Figure AQ-1.

Figure AQ-1: Location of Sensitive & Worker Receptors

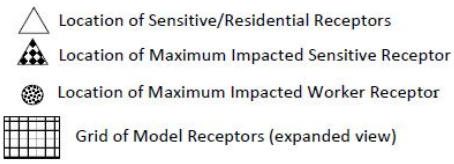

Table AQ-6 provides a summary of the HRA modeling of cancer risks and chronic non-cancer hazards resulting from the Project's operational DPM emissions along with the SCAQMD health risk significance thresholds. As shown, the estimated maximum cancer risk for a sensitive receptor is 6.2 in one million and <0.02 in one million for a worker receptor. These risk levels are less than the 10 in one million significance threshold. Also, the estimated non-cancer hazard index is less than the significance threshold. Therefore, operation of the project would result in less than significant impacts.

Table AQ-6: Localized Significance Summary of Operation Emissions

	Maximum Lifetime Project Risk	Threshold	Exceed Threshold?
Cancer Risk (per million)			
Maximum Impacted Sensitive Receptor- Infant-Adult	5.3	10	No
Maximum Impacted Sensitive Receptor-Child	3.7	10	No
Maximum Impacted Sensitive Receptor-Adult	0.9	10	No
Maximum Impacted Sensitive Receptor-70-years	6.2	10	No
Maximum Impacted Worker Receptor	0.4	10	No
Chronic Non-Cancer Hazard Index			
Maximum Impacted Sensitive Receptor	<0.02	1.0	No

Source: Health Risk Assessment (Appendix B)

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

Response:

Less than Significant. The proposed Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities. During operations, potential odor sources include odors from exhaust as well as the temporary storage of typical solid waste (refuse) associated with the proposed Project's long-term operational uses.

Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of

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

public nuisances. Therefore, odor impacts associated with the proposed Project's construction and operations would less than significant.

Plans, Programs, or Policies (PPPs)

PPP AQ-1: Rule 403. All applicable measures included in Rule 403, shall be incorporated into Project plans and specifications as implementation of Rule 403, which include but are not limited to (1):

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- There shall be no grading activities on more than 10 acres in any one day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are limited to 15 miles per hour or less.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.

PPP AQ-2: Rule 1113. The following measures shall be incorporated into Project plans and specifications as implementation of SCAQMD Rule 1113 (2):

- Only "Low-Volatile Organic Compounds (VOC)" paints (no more than 50 gram/liter of VOC) consistent with SCAQMD Rule 1113 shall be used.

Mitigation Measures
None.

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
     - 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
5. Air Quality, Energy, and Greenhouse Gas Impact Analysis for the Alessandro & Old 215 Industrial Business Park Project, EPD Solutions, July 2021, Appendix A.
6. Health Risk Assessment of the Alessandro Boulevard and I-215 Industrial Project City of Moreno Valley, CA, Vince Mirabella, July 2021, Appendix B.

IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California	☐	☒	☐	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Department of Fish and Game or U.S. Fish and Wildlife Service?				

Response:

Less than Significant with Mitigation. A Biological Resources Assessment was prepared for the proposed Project, which included a field survey conducted on March 13, 2021 (Appendix C to this IS/MND). The Biological Resources Assessment describes that the Project site contains three habitats: eucalyptus woodland, ruderal, and disturbed/developed. According to the California Natural Diversity Database (CNDDB), a total of 44 sensitive species of plants and 61 sensitive species of animals have the potential to occur on or within the vicinity of the Project area. These include those species listed or candidates for listing by the U. S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW) and California Native Plant Society (CNPS). All habitats with the potential to be used by sensitive species were evaluated during the field survey for their presence or potential presence.

Sensitive Plant Species

A total of 19 plant species are listed as state and/or federal Threatened, Endangered, or Candidate species; are required to be reviewed under the Narrow Endemic Plant section of the Western Riverside MSHCP; are 1B.1 listed plants on the CNPS Rare Plant Inventory; or have been found to have a potential to exist within the Project region. Table Bio-1 shows survey results for listed and potential plant species and demonstrates that no sensitive plant species are present at the Project site.

Table Bio-1: Potentially Occurring Plant Species

Plant Species	Presence
Chaparral Sand-Verbena	Not Present
Munz's Onion	Not Present
San Diego Ambrosia	Not Present
Marsh Sandwort	Not Present
Horn's Milk-Vetch	Not Present
San Jacinto Valley Crownscale	Not Present
Parish's Brittlescale	Not Present
Nevin's Barberry	Not Present
Thread-Leaved Brodiaea	Not Present
Smooth Tarplant	Not Present
Salt Marsh Bird's-Beak	Not Present
Parry's Spineflower	Not Present
Slender-horned Spineflower	Not Present
Santa Ana River Woollystar	Not Present
Mesa Horkelia	Not Present
Coulter's Goldfields	Not Present
Gambel's Water Cress	Not Present
Spreading Navarretia	Not Present
Brand's Star Phacelia	Not Present

Sensitive Animal Species

Based on the CNDDB, a total of 17 animal species that are listed as state or federally Threatened, Endangered, or Candidate have the potential to occur within the Project region.

However, Table Bio-2 shows survey results for listed and potential animal species, which demonstrates that no sensitive species are present at the Project site.

Table Bio-2: Potentially Occurring Animal Species

Animal Species	Presence
Tricolored Blackbird	Not Present
Burrowing Owl	No suitable habitat; species not present
Crotch Bumble Bee	Not Present
Swainson's Hawk	Not Present
Santa Ana Sucker	Not Present
Western Yellow-Billed Cuckoo	Not Present
San Bernardino Kangaroo Rat	Not Present
Stephen's Kangaroo Rat	Not Present
Southwestern Willow Flycatcher	Not Present
Quino Checkerspot Butterfly	Not Present
Bald Eagle	Not Present
California Black Rail	Not Present
Steelhead-southern California DPS	Not Present
Coastal California Gnatcatcher	Not Present
Southern Mountain Yellow-legged Frog	Not Present
Delhi Sands Flower-loving Fly	Not present
Riverside Fairy Shrimp	Not Present
Least Bell's Vireo	Not Present

Source: Biological Resources Assessment, Appendix C

The Biological Resources Assessment determined that the Project site does not provide suitable habitat for any special-status plant or wildlife species due to the disturbed status of the site.

The existing trees on the site have the potential to provide habitat for nesting migratory birds. Many of these trees would be removed during construction. Therefore, the proposed Project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA could result in a potentially significant impact if requirements of the MBTA are not followed. However, implementation of mitigation measure MM BIO-1 would ensure MBTA compliance and would require a nesting bird survey to be conducted prior to the commencement of construction during nesting season, which would reduce potential impacts related to nesting avian species and native wildlife nursery sites to a less than significant level.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community	☐	☐	☒	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors.

As described above, the Project site is heavily disturbed, graded, and consists of mostly vacant land other than a single-family residence and two commercial buildings within the Project site. As described in the Biological Assessment (Appendix C to this IS/MND), there is no riparian habitat on the Project site and there are no sensitive natural communities on site. The Project site is not located within any designated critical habitat areas. Therefore, no significant impacts related to riparian habitat or other sensitive natural communities identified in local or regional plans would result from proposed Project implementation, and no mitigation is required.

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. As discussed in the Biological Assessment (Appendix C to this IS/MND), no natural hydrologic features or federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) occur onsite, and the Project site does not meet the Army Corps of Engineers (ACOE) criteria for wetlands and waters of the U.S. Therefore, no direct removal, filling, or hydrological interruption of a wetland area would occur with development of the Project site. As such, no impacts would occur.

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 with Mitigation. The Project site does not contain mountain canyons or riparian corridors between major wildlife habitats. The proposed Project area is surrounded by development. No wildlife movement corridors were found to be present on the Project site. Therefore, no impacts to wildlife corridors would occur.

The existing trees on the site have the potential to provide habitat for nesting migratory birds. Many of these trees would be removed during construction. Therefore, the proposed Project has the potential to impact active bird nests if vegetation and trees are removed during the nesting season. Nesting birds are protected under the MBTA (United States Code Title 33, Section 703 et seq.; see also Code of Federal Regulations Title 50, Part 10) and Section 3503 of the California Fish and Game Code. Any activities that occur during the nesting/breeding season of birds protected by the MBTA, could result in a potentially significant impact if requirements of the MBTA are not followed. Implementation of mitigation measure MM BIO-1 would ensure MBTA compliance and would require a nesting bird survey to be conducted prior to the commencement of construction during nesting season, which would reduce potential

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
impacts related to nesting avian species and native wildlife nursery sites to a less than significant level.				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

Response:

Less than Significant. The proposed Project would be required to pay applicable MSHCP fees pursuant to Moreno Valley Municipal Code Chapter 3.48. The proposed Project would pay fees pursuant to Chapter 3.48 of the Municipal Code, which would be ensured through the City development review and building plan check process. As such, the proposed Project would not conflict with any local policies protecting biological resources, including trees, and impacts would be less than significant.

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 with Mitigation. The Project area is located within the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP). The Project site is not located within a Criteria Cell or Cell Group. Table Bio-3, below, demonstrates Project consistency with the requirements of the MSHCP.

Table Bio-3: MSHCP Consistency Analysis

MSHCP Requirement	Project Consistency
Section 6.1.2 Species Associated with Riparian/Riverine Habitat and Vernal Pools	**Consistent.** The Project area does not contain any drainage, riparian, or riverine features. In addition, none of the riparian/riverine bird species listed in Section 6.1.2 of the MSHCP were found within the Project area. Due to the lack of suitable riparian habitat on the Project site, focused surveys for riparian/riverine bird species listed in Section 6.1.2 of the MSHCP are not warranted and were not conducted. None of the conditions associated with vernal pools (i.e., depressions, ponded water, hydric soils, etc.) were observed on site. No features are present that would support fairy shrimp. No standing water or other sign of areas that pond water (e.g., mud cracks, tire ruts, drainages) were recorded.
Section 6.1.3 Sensitive Plant Species	The Project site is not located within the Western Riverside County MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA) pursuant to Section 6.1.3 of the MSHCP. Therefore, the NEPSSA requirements are not applicable to the Project.
Section 6.1.4 Urban/Wildlands Interface Guidelines	The Project site is not located within or adjacent to a Western Riverside County MSHCP Conservation Area; therefore, the Project site is

	not required to address Section 6.1.4 of the Western Riverside County MSHCP.
Section 6.3.2 Additional Surveys and Procedures	The Project site is not located within the Western Riverside County MSHCP Additional survey areas for amphibians, mammals, or any special linkage areas. In addition, the Project site is not located within the Western Riverside County MSHCP Criteria Area Plant Species Survey Area (CAPSSA) pursuant to Section 6.3.2 of the Western Riverside County MSHCP. However, the Project site is located within the Western Riverside County MSHCP Additional survey area for burrowing owl. A habitat assessment for burrowing owl was conducted on the site. No burrowing owl or burrowing owl sign (e.g., pellets, whitewash, scat, tracks, and/or feathers) were observed on the Project site. Further, no sign of ground squirrels was identified on the Project site. The nearest recorded occurrence of burrowing owl is located approximately two miles from the site. The Project site is heavily disturbed by continuous weed abatement, vehicle use, dumping, pedestrian traffic, and domestic animal use. The site is surrounded by urban development and busy roads. Due to the high level of disturbance and lack of ground squirrel activity on the site, the habitat assessment resulted in the finding that there is no suitable habitat for this species present on the Project site. However, due to the fact that the project site is located within the Western Riverside County MSHCP burrowing owl survey area, a 30-day preconstruction survey is required prior to the commencement of project activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering) to ensure that no owls have colonized the site in the days or weeks preceding Project activities, as outlined in MM BIO-2.

Source: Biological Resources Assessment, Appendix C.

As shown in the preceding table, the proposed Project would be consistent with the MSHCP with incorporation of a pre-construction burrowing owl survey, and therefore, would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Impacts would be less than significant with implementation of MM BIO-2.

Plans, Programs, or Policies (PPPs)

None.

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

Mitigation Measures:

MM BIO-1: Nesting Bird Survey. If site-preparation activities for the Project are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist prior to the issuance of grading permits for, to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the implementing project site and an appropriate buffer of 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (non-listed), or 100 feet of sensitive or protected songbird nests, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

MM BIO-2: Burrowing Owl Survey. A pre-construction survey for resident burrowing owls shall be conducted by a qualified biologist within 30 days prior to commencement of grading and construction activities to ensure that no owls have colonized the site in the days or weeks preceding Project activities. If ground disturbing activities in these areas are delayed or suspended for more than 30 days after the pre-construction survey, the area shall be resurveyed for owls. The pre-construction survey and any relocation activity shall be conducted in accordance with the current Burrowing Owl Instruction for the Western Riverside MSHCP.

If active nests are identified on an implementing project site during the pre-construction survey, the nests shall be avoided, or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.

If burrowing owls occupy any implementing portion of the Project site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Moreno Valley Planning Department and the CDFW. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The implementing Project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFW shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation. If avoidance is infeasible, then a DBESP shall be required, including associated relocation of burrowing owls. If conservation is not required, then owl relocation shall still be required following accepted protocols. Take of active nests shall be avoided, so it is strongly recommended that any relocation occur outside of the nesting season.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.1 – Biological Resources

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

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
7. General Biological Assessment and Western Riverside County MSHCP Consistency Analysis, Hernandez Environmental Services, July 2021, Appendix C.

V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒

Response:

No Impact. According to the *State CEQA Guidelines*, a historical resource is defined as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by the Project's Lead Agency. Implementation of the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines, as there are no eligible historical resources on the Project site.

The California Register of Historical Resources defines a "historical resource" as a resource that meets one or more of the following criteria: (1) associated with events that have made a significant contribution to the broad patterns or local or regional history of the cultural heritage of California or the United States; (2) associated with the lives of persons important to local, California, or national history; (3) embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values; or (4) has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The Project site is currently developed with one single-family residence and two commercial buildings. The two commercial buildings were constructed prior to 1971. As such, a Historical Resources Assessment was prepared to determine the potential for these buildings to be historical resources per CEQA, which is summarized below (Appendix D).

13876 Old 215 Highway Frontage; APN 263-220-028

The Historical Resources Assessment described that the building at 13876 Old 215 Highway Frontage, which serves as the American Legion Post 574, was built in 1930 and enlarged in 1964. The assessment found that the building is an unremarkable wood-frame building that has been enlarged and substantially altered by a concrete block addition. No evidence has been presented that the property had any influence on events after 1930 that made a significant

contribution to the history or cultural heritage of Moreno Valley. The building does not contribute to the history of architecture in Moreno Valley or Riverside County. Additionally, the site does not appear to have the capacity to yield information important to the history of the local area. As such, the assessment concluded that the building is not eligible for listing as a historic property due to the lack of physical integrity. Additionally, it should be noted that this building would not be modified by the proposed Project as the Project would only include modifications to the surrounding parking lot.

13906 Old 215 Highway Frontage Road; APN 263-220-009

The Historical Resources Assessment described the building at 13906 Old 215 Highway Frontage Road, which serves as a commercial tire shop, was built in 1950. The assessment found that the building does not present a notable example of 1950s, Mid-Century commercial architecture. No evidence has been presented that the property had any influence on events after 1950 that made a significant contribution to the history or cultural heritage of Moreno Valley. The property has not been found to have been associated with any persons important to the history of Moreno Valley or the United States. The building does not contribute to the history of architecture in Moreno Valley or Riverside County. Additionally, the site does not appear to have the capacity to yield information important to the history of the local area. As such, the assessment concluded that the building is not eligible for listing as a historic property.

Based on the findings of the Historical Resources Assessment (Appendix D), the existing residences on the Project site do not meet the criteria for being historic resources. Therefore, no historic resources exist, and no impacts would occur.

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

Response:

Less than Significant with Mitigation. In its existing setting, the Project site is highly disturbed, graded, and consists of vacant land, paved areas, one single-family residence, and two commercial buildings. As described previously, the Project site has been previously disturbed from various past uses that involve grading and installation of utility infrastructure. The Phase I Cultural Resources prepared for the Project included an archaeological records search that was completed at the University of California, Riverside Eastern Information Center (EIC) (Appendix E). The EIC is the countywide clearinghouse/repository for all archaeological and cultural studies completed within the Riverside County. All pertinent data was researched, including previous studies for a one-mile radius surrounding the Project area and the identification of recorded resources within one mile. In addition, the research included review of the current listings (federal, state, and local) for evaluated resources and reviewed historic maps. The records search indicated that 72 cultural resources were previously identified within one (1) mile of the Project area, with none of the previously recorded resources occurring onsite. Furthermore, the cultural resource survey conducted on April 22, 2021 discovered one cultural resource consisting of seventeen historic foundation pads with associated historic debris and one prehistoric lithic core isolate. Therefore, the Cultural Resources Assessment concluded that the Project site has a high sensitivity for the presence of prehistoric or historical archaeological deposits or features. As a result, the potential for archaeological resources exists on site are high. Therefore, Mitigation Measure CUL-1 shall be implemented to require archaeological monitoring during ground disturbing activities. With implementation of Mitigation Measure CUL-1, Project impacts to archeological resources would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?	☐	☐	☐	☒

Response:

No Impact. The Project site has been previously disturbed, as described above, and has not been previously used as a cemetery. It is not anticipated that implementation of the proposed Project would result in the disturbance of human remains. In addition, compliance with California Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5, and Public Resources Code Section 5097.98, included as PPP CUL-1, mandate the process to be followed in the event of an accidental discovery of any human remains. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the human remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Compliance with existing law would ensure that impacts to human remains would not occur.

Plans, Programs, or Policies (PPPs)

PPP CUL-1: Should human remains be discovered during project construction, the project would be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

Mitigation Measures

MM CUL-1: Archaeological Monitoring

The applicant/Project developer shall retain a Secretary of Interior Standards qualified archaeologist to be present at pre-grade meetings and to perform archaeological monitoring for all initial ground disturbing activities. The archaeological monitor shall be present during the initial ground-disturbing activities for the first five feet to identify any known or suspected archaeological and/or cultural resource. The qualified archaeologist shall develop an Archaeological Monitoring and Treatment Plan to address the details, timing and responsibility of all archaeological and cultural resource activities that occur on the project site. The plan shall include a scope of work, project grading and development scheduling, a monitoring schedule during all ground related activities, safety requirements, and protocols to follow in the event of previously unknown cultural resources discoveries that could be subject to a cultural resources evaluation. The plan shall be submitted to the City for review and approval.

In the event that cultural resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified

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

archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or resource recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies).

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.*)
6. Phase I Cultural Resources Assessment, Material Culture Consulting, July 2021, Appendix E.

VI. ENERGY – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Response:

Less than significant impact.

Construction

During construction of the proposed Project would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities related to the proposed industrial development and the associated infrastructure are not expected to result in demand for fuel greater on a per-development basis than other development projects in Southern California. Table E-1 details the construction fuel usage over the Project's construction period, as shown in Table E-1 below.

Table E-1 Construction Equipment Fuel Consumption Estimates

Activity	Equipment	Number	Hours per day	Horse-power	Load Factor	Days of Construction	Total Horsepower-hours	Fuel Rate (gal/hp-hr)	Fuel Use (gallons)
Demolition	Concrete/Industrial Saws	1	8	81	0.73	20	9461	0.041939	397
	Excavators	3	8	158	0.38	20	28819	0.019856	572
	Rubber Tired Dozers	2	8	247	0.4	20	31616	0.020601	651
Site Preparation	Crawler Tractors	4	8	212	0.43	10	29171	0.022176	647
	Rubber Tired Dozers	3	8	247	0.4	10	23712	0.020601	488
Grading	Crawler Tractors	2	8	212	0.43	30	43757	0.022176	970
	Excavators	2	8	158	0.38	30	28819	0.019856	572
	Graders	1	8	187	0.41	30	18401	0.021161	389
	Rubber Tired Dozers	1	8	247	0.4	30	23712	0.020601	488
	Scrapers	2	8	367	0.48	30	72226	0.024989	1805
Building Construction	Cranes	1	8	231	0.29	300	160776	0.014895	2395
	Forklifts	3	8	89	0.2	300	128160	0.010444	1339
	Generator Sets	1	8	84	0.74	300	149184	0.042313	6312
	Tractors/Loaders/ Backhoes	3	8	97	0.37	300	258408	0.019147	4948
	Welders	1	8	46	0.45	300	49680	0.025818	1283
Paving	Pavers	2	8	130	0.42	20	17472	0.021532	376
	Paving Equipment	2	8	132	0.36	20	15206	0.018465	281
	Rollers	2	8	80	0.38	20	9728	0.019836	193
Architectural Coating	Air Compressors	1	8	78	0.48	30	8986	0.027579	248
								Total	24,354

Source: EPD Solutions, 2021 (Appendix A)

Construction of the Project would result in fuel consumption from the use of construction tools and equipment, vendor and haul truck trips, and vehicle trips generated from construction workers traveling to and from the site. There are no unusual project characteristics that would cause the use of construction equipment that would be less energy efficient compared with other similar construction sites in other parts of the State. Therefore, construction-related fuel consumption by the Project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the region, and impacts would be less than significant.

Operation

Once operational, the Project would generate demand for electricity, natural gas, as well as gasoline for fuel tanks. Operational use of energy includes the heating, cooling, and lighting of the buildings, water heating, operation of electrical systems and plug-in appliances, parking lot and outdoor lighting, and the transport of electricity, natural gas, and water to the areas where they would be consumed. This use of energy is typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

The State of California provides a minimum standard for building design and construction standards through Title 24 of the California Code of Regulations (CCR). Compliance with Title 24 is mandatory at the time new building permits are issued by local governments. The City's administration of the Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced. Thus, operation of the Project would not use large amounts of energy or fuel in a wasteful manner, and no operational energy impacts would occur. As detailed in Table E-2, operation of the proposed Project is estimated to result in the annual use of approximately 162,312 gallons of diesel fuel, 69,967 gallons of gasoline, approximately 3,518161 thousand British thermal units (BTU) of natural gas, and approximately 3,347,680 kilowatt-hours (kWh) of electricity.

Table E-2: Project Annual Operational Energy Demand Summary

Operational Source	Energy Usage	
Electricity (Kilowatt-Hours)		
Project	3,347,680	
Natural Gas (Thousands British Thermal Units)		
Project	3,518,161	
Petroleum (gasoline) Consumption		
	Annual VMT	Gallons of Gasoline Fuel
Project	2,114,404	69,967
Diesel Consumption		
	Annual VMT	Gallons of Diesel Fuel[1]
Project	2,047,760	162,312

[1]Operation of trucks and emergency fire pumps
Source: EPD Solutions, 2021 (Appendix A)

Therefore, construction and operations-related fuel consumption by the Project would not result in inefficient, wasteful, or unnecessary energy use compared with other construction sites in the region, and impacts would be less than significant.

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

Response:

Less than Significant. The California Title 24 Building Energy Efficiency Standards are designed to ensure new and existing buildings achieve energy efficiency and preserve outdoor and indoor environmental quality. These measures (Title 24, Part 6) are listed in the California Code of Regulations. The California Energy Commission is responsible for adopting, implementing and updating building energy efficiency. Local city and county enforcement agencies have the authority to verify compliance with applicable building codes, including energy efficiency. As required by Municipal Code, Chapter 8.20 California Building Code, prior to issuance of a building permit, the Project Applicant shall submit plans showing that the Project would be in compliance with 2019 Title 24 requirements. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would not occur. As such, the Project would have less than significant impacts related to energy.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

Sources:

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:

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:

No Impact. As stated in the Preliminary Geotechnical Investigation conducted by NorCal Engineering (see Appendix F), the Project site is not within a currently established Alquist-Priolo Earthquake Fault Zone. The Project site does not contain and is not in the vicinity of an earthquake fault, and is not affected by a state-designated Alquist-Priolo Earthquake Fault Zone. The closest active fault is the San Jacinto Fault located approximately 3.75 miles northeast of the site. Because the Project site is in a seismically active region of Southern California, occasional seismic ground shaking is likely to occur within the lifetime of the proposed Project. However, the potential for surface rupture of a fault onsite is considered very low. As such, no impacts would occur.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Response:

Less than Significant. The Project site is located within a seismically active region of Southern California. As mentioned previously, the San Jacinto Fault is located approximately 3.75 miles northeast of the Project site. Thus, moderate to strong ground shaking can be expected at the site. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located

closer to an earthquake epicenter, that consists of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude.

Structures built in the City are required to be built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]), included in the Municipal Code as Chapter 8.20. Compliance with the CBC would ensure earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of the ground motion. Compliance with the CBC would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. Therefore, with CBC compliance, included as PPP GEO-1, the proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking more than other developments in Southern California. Impacts would be less than significant.

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

Response:

Less than Significant. As discussed in the Geotechnical Investigation (Appendix D), the Project site is not located in an area of potential liquefaction. Therefore, the Project site is not subject to liquefaction-induced settlement. Additionally, the Geotechnical Investigation provides California Building Code (CBC) regulations for the proposed development to reduce any potential for liquefaction-induced settlement to a less than significant level, which would be verified by the City through the development permitting process. With adherence to CBC requirements, included as PPP GEO-1, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving liquefaction and impacts would be less than significant.

iv) Landslides?	☐	☐	☐	☒

Response:

No Impact. The Project site is relatively flat with a gentle slope in the southwest direction. The maximum site elevation is approximately 1,556 feet above mean sea level (amsl) and the minimum site elevation is approximately 1,542 feet amsl. Furthermore, according to the City of Moreno Valley General Plan Map S-3, portions of the Project site are mapped as moderate landslide susceptibility (Class V). As such, the Project site is not located in an area mapped for high susceptibility to seismic-induced landslides. Additionally, onsite soils would be graded and compacted per the requirements of the CBC, included as PPP GEO-1, which would reduce potential impacts related to seismic-induced landslides. Therefore, no impacts related to landslides would occur.

b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Response:

Less than Significant. The proposed Project would involve excavation, grading, and construction activities that would disturb soil and leave exposed soil on the ground surface. As such, the proposed Project would be required to comply with the City's grading standards and erosion control measures, included in Chapter 8.10 (Stormwater/Urban Runoff Management and Discharge Controls) of the City's Municipal Code. Additionally, the Construction General Permit issued by the State Water Resources Control Board (SWRCB), regulates construction activities to minimize water pollution, including sediment. The proposed Project would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including implementation of a Stormwater Pollution Prevention Plan (SWPPP) and associated BMPs during grading and construction, which would be required during construction permitting of the Project.

Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. After project completion, the Project site would be developed with six industrial warehouse buildings, new paved parking lot, and landscape improvements, and would not contain exposed soil. Additionally, the Project would implement the operational BMPs as included in the Water Quality Management Plan (Appendix F) for the Project, which would reduce operational runoff from the site. Thus, the potential for soil erosion or the loss of topsoil would be expected to be extremely low. Construction of the proposed Project would have a less than significant impact related to soil erosion.

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. As described above, the Project site is relatively flat, and does not contain nor is adjacent to any significant slope or hillside area. The Project would not create slopes. Thus, on or off-site landslides would not occur from implementation of the Project.

According to the Geotechnical Investigation, the site does not contain liquefiable soils. Differential settlement or subsidence could occur if buildings or other improvements are built on low-strength foundation materials (including imported fill) or if improvements straddle the boundary between different types of subsurface materials (e.g., a boundary between native material and fill). Although differential settlement generally occurs slowly enough that its effects are not dangerous to inhabitants, it can cause building damage over time.

As described previously, compliance with the requirements of the CBC, included as PPP GEO-1, and related recommendations in the Geotechnical Investigation related to compaction of soils and development of foundations is required as part of the building plan check and development permitting process, and would reduce potential impacts related to liquefaction, settlement, and ground collapse to a less than significant level.

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. Expansive soils contain certain types of clay minerals that shrink or well as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experiences, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The Geotechnical Investigation performed an evaluation of the potential for expansive soils at the site and expansion index testing was performed on representative samples of the near surface soils which are anticipated to be within the zone of influence of the planned improvements. The results of expansion index testing indicated that near surface soils have very low to medium expansion potential. As such, proper moisture conditioning measures should be taken during Project grading (NorCal, 2021). In addition, as described previously, compliance with the CBC, included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand the effects of related to ground movement, including expansive soils. Therefore, impacts 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 connect existing Edgemont Community Services District (ECSD) sewer lines in Old 215 Frontage Road. No septic tanks are proposed, and no impacts would occur with implementation of the proposed Project.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Response:

Less than Significant. The Project would demolish the existing onsite residence and commercial building and construct six warehouse buildings. Earthmoving activities, including grading and trenching activities, would have the potential to disturb previously unknown paleontological resources if earthmoving activities occur at substantial, undisturbed depths. As discussed in the Paleontological Resources Assessment, the Project site is underlain by Quaternary alluvial deposits, which may overlie older Quaternary alluvium. While younger Quaternary alluvial deposits have a low potential to produce significant paleontological resources, older Quaternary alluvial units have the high potential to yield significant fossil resources if encountered subsurface. The paleontological survey, conducted on April 22, 2021, did not identify any visible paleontological resources onsite.

A records search at the Los Angeles County Museum of Natural History did not identify any previous finds of vertebrate fossil localities within the Project site. However, records of vertebrate fossil localities have been found in other local sedimentary deposits similar to those that occur on the Project site. Previous finds include a vertebrate fossil locality from similar deposits located approximately in Chino Valley. Fossils from this locality were discovered at depths of 9 to 11 feet below ground surface. Additionally, the Project site is mapped as high sensitivity for paleontological resources by the County of Riverside. Therefore, Project related excavations that extend down into older Quaternary deposits may encounter fossil vertebrates. As a result, Mitigation Measure PAL-1 is included to require that any substantial excavations below four feet be monitored to identify and recover any significant fossil remains. With implementation of Mitigation Measure PAL-1, impacts to paleontological resources would be less than significant.

Plans, Programs, or Policies (PPPs)

PPP GEO-1: California Building Code. The Project is required to comply with the California Building Code as included in the City's Municipal Code Chapter 8.20 to preclude significant adverse effects associated with seismic hazards. California Building Code related and geologist and/or civil engineer specifications for the Project are required to be incorporated into grading plans and specifications as a condition of Project approval.

PPP WQ-1: SWPPP. As listed below in Section 10, *Hydrology and Water Quality*.

Mitigation Measures

MM PAL-1: Paleontological Monitoring. Prior to the issuance of grading permits, the applicant shall provide a letter to the City of Moreno Valley Planning Department, or designee, from a professional paleontologist, stating that the paleontologist has been retained to provide services for the Project. The paleontologist shall develop a Paleontological Resources Impact Mitigation Plan (PRIMP) to mitigate the potential impacts to unknown buried paleontological resources that may exist onsite. The PRIMP shall be provided to the City for review and approval. The PRIMP shall require that the paleontologist be present at the pre-grading conference to establish procedures for paleontological resource surveillance. The PRIMP shall also require paleontological monitoring for excavation below four feet below ground surface.

In the event paleontological resources are encountered, ground disturbing activity within 50 feet of the area shall cease. The paleontologist shall examine the materials encountered, assess the nature and extent of the find, and recommend a course of action to further investigate and protect or recover and salvage those resources that have been encountered.

Criteria for discard of specific fossil specimens shall be made explicit. If a qualified paleontologist determines that impacts to a sample containing significant paleontological resources cannot be avoided by project planning, then recovery may be applied. Actions may include recovering a sample of the fossiliferous material prior to construction, monitoring work and halting construction if an important fossil needs to be recovered, and/or cleaning, identifying, and cataloging specimens for curation and research purposes. Recovery, salvage, and treatment shall be done at the Applicant's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation by the paleontologist. Resources shall be identified and curated into an established accredited professional repository. The paleontologist shall have a repository agreement in hand prior to initiating recovery of the resource.

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
7. Geotechnical Engineering Investigation, NorCal Engineering, February 19, 2021, Appendix F.
8. Paleontological Resources Assessment, Material Culture Consulting, August 2021, Appendix G.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

GHG Thresholds

The City of Moreno Valley has not adopted numerical significance thresholds for managing greenhouse gases (GHGs). In accordance with CEQA guidance, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to assess the significance of a project's GHG emissions. The Project site is located within the jurisdiction of the SCAQMD. The most recent proposal was issued in September 2010 (SCAQMD 201011) uses a tiered approach to evaluate potential

GHG impacts from various uses. This assessment applies the Tier 3 approach that provides as follows for emissions in terms of metric tons of carbon dioxide (CO_2) equivalents ($MTCO_2e$):

- Tier 3 consists of screening values, which the lead agency can choose but must be consistent with all its jurisdiction projects. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
  - Option 1: All land use types: 3,000 $MTCO_2e$ per year
  - Option 2: Based on land use type: residential: 3,500 $MTCO_2e$ per year; commercial: 1,400 $MTCO_2e$ per year; or mixed use: 3,000 $MTCO_2e$ per year

For industrial projects where the SCAQMD is the Lead Agency, the SCAQMD adopted a stationary source GHG significance threshold is 10,000 $MTCO_2e$ per year. This approach is also widely used by the City of Moreno Valley and various other cities in the SCAB, where the SCAQMD is not the lead agency. Further, this 10,000 $MTCO_2e$ per year threshold has been applied by the City of Moreno Valley for all other recent industrial developments subject to CEQA (Compass Danbe Center Point and Moreno Valley Trade Center). As such, this threshold of 10,000 $MTCO_2e$ is utilized herein to determine if emissions of GHG from this proposed industrial Project would be significant. The SCAQMD significance thresholds also evaluate construction emissions by amortizing them over an expected project life of 30 years.

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

Response:

Less than Significant. GHG emissions associated with Project construction would occur over the short term and would consist primarily of emissions from equipment exhaust. Long-term regional emissions would also be associated with new vehicular trips and stationery-source emissions (i.e., natural gas used for heating and electricity usage for lighting). The calculations presented below include construction emissions in terms of annual CO_2e GHG emissions from increased energy consumption, water usage, and solid waste disposal, as well as estimated GHG emissions from vehicular traffic that would result from implementation of the proposed Project.

During construction of the proposed Project, GHGs would be emitted through the operation of construction equipment, as well as emissions from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. As shown on Table GHG-1 construction of the project would result in 36 $MTCO_2e$ amortized over 30 years.

Table GHG-1: Project GHG Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
Project Operational Emissions	
Area	0
Energy	410
Mobile	2,790
Offroad	138
Stationary	27
Waste	109
Water	170

Subtotal	**3,644**
Amortized Construction Emissions	36
Total Emissions	**3,680**
Significance Threshold	10,000
Threshold Exceeded?	**No**

Source: EPD Solutions, 2021 (Appendix A)

During operations, the Project would generate long-term GHG emissions from vehicular trips; water, natural gas, and electricity consumption; and solid waste generation. Mobile-source emissions of GHGs would include project generated vehicle trips associated with employee and truck trips to and from the Project site. Area-source emissions would be associated with activities such as landscaping and maintenance of proposed land uses, natural gas for heating, and other sources. Increases in stationary-source emissions would also occur at off-site utility providers as a result of demand for electricity, natural gas, and water by the proposed use.

As shown on Table GHG-1, the Project would result in approximately 3,680 $MTCO_2e$ per year, which would be substantially below the screening threshold of 10,000 $MTCO_2e$ per year. Therefore, construction and operation impacts related to greenhouse gas emissions would be less than significant.

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

Response:

Less than Significant. The Project involves the demolition of one existing single-family residence on Bay Avenue and one of the commercial buildings on Old 215 Frontage Road, and construction of six industrial warehouse buildings totaling 196,759 SF on the Project site. In 2006, the California State Legislature adopted AB 32, the California Global Warming Solutions Act of 2006. AB 32 requires the California Air Resources Board (CARB) to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap, which was phased in starting in 2012. Therefore, as the proposed Project meets the current interim emissions targets/thresholds established by SCAQMD, it would also be on track to meet the reduction target of 40 percent below 1990 levels by 2030, as mandated by the State. Furthermore, all of the post-2020 reductions in GHG emissions are addressed via regulatory requirements at the State level, and the proposed Project would be required to comply with these regulations as they come into effect.

In June 2021, the Moreno Valley City Council approved the City's Climate Action Plan (CAP). The CAP is a policy document which identifies the way the City can reduce energy and water consumption and GHG emissions. However, the CAP does not itself establish a numeric threshold of significance for determining impacts with respect to GHG emissions. Emissions from vehicles, which are the main source of operational GHG emissions associated with the Project (as shown in Table GHG-1), would be reduced through implementation of the state and federal fuel and vehicle emission standards. In addition, the Project would not exceed the screening threshold, as shown in Table GHG-1. Therefore, implementation of the proposed Project would not conflict with the City's CAP or other existing plans, policies, or regulations adopted for the purpose of reducing GHG emissions and impacts would be less than significant.

Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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
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:

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. Development and long-term operation of the Project would require standard transport, use, and disposal of hazardous materials and wastes. The use and proper handling of these materials must adhere to established federal, state, and local laws and regulations in order to avoid exposure by workers, building occupants, residents, the public and/or the environment to hazardous materials.

Construction

Heavy construction equipment (e.g., dozers, excavators, tractors) would be operated for development of the Project. The equipment would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored, handled, or transported. Other materials used—such as paints, adhesives, and solvents—could also result in accidental releases or spills that could pose risks to people and the environment. These risks are standard, however, on all construction sites, and the Project would not cause greater risks than would occur on other similar construction sites.

Construction contractors would be required to comply with federal, state, and local laws and regulations regarding the transport, use, and storage of the hazardous materials. Applicable laws and regulations include CCR, Title 8 Section 1529 (pertaining to ACM) and Section 1532.1 (pertaining to LBP); CFR, Title 40, Part 61, Subpart M (pertaining to ACM); CCR, Title 23, Chapter 16 (pertaining to UST); CFR, Title 29 - Hazardous Waste Control Act; CFR, Title 49, Chapter I; and Hazardous Materials Transportation Act requirements as imposed by the USDOT, CalOSHA, CalEPA and DTSC. Additionally, construction activities would require a Stormwater Pollution Prevention Plan (SWPPP), which is mandated by the National Pollution Discharge Elimination System General Construction Permit (included as PPP WQ-1 herein) and enforced by the Santa Ana RWQCB. The SWPPP will include strict on-site handling rules and BMPs to minimize potential adverse effects to workers, the public, and the environment during construction, including, but not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Mandatory compliance with applicable laws and regulations related to the routine transport,

use, and disposal of hazardous materials during construction activities at the Project site would limit potentially significant hazards to construction workers, the public, and the environment. Impacts would be less than significant.

Operation

The Project site would be developed with six warehouse buildings. Depending on the type of business, operations would require the use of various types and quantities of hazardous materials, including lubricants, solvents, cleaning agents, wastes, paints and related wastes, petroleum, wastewater, batteries, (lead acid, nickel cadmium, nickel, iron, carbonate), scrap metal, and used tires. These hazardous materials would be used, stored, and disposed of in accordance with applicable regulations and standards (such as CFR, Title 49, Chapter I; CCR, Title 8; CFR, Title 40, Part 263) that are enforced by the USEPA, USDOT, CalEPA, CalOSHA, DTSC, and County of Riverside Environmental Health Division.

Under California Health and Safety Code Section 25531 et seq., CalEPA requires businesses operating with a regulated substance that exceeds a specified threshold quantity to register with a managing local agency, known as the Certified Unified Program Agency (CUPA). Additionally, businesses would be required to provide workers with training on the safe use, handling, and storage of hazardous materials. Businesses would be required to maintain equipment and supplies for containing and cleaning up spills of hazardous materials that can be safely contained and cleaned by onsite workers and to immediately notify emergency response agencies in the event of a hazardous materials release that cannot be safely contained and cleaned up by onsite personnel. The compliance with existing laws and regulations governing hazard and hazardous materials would reduce potential impacts related the routine transport, use, and disposal of the hazardous materials to 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 with Mitigation. In August 2021, AEI Consultants completed a Phase I Environmental Assessment (Phase I ESA) of the ten parcels within the Project site (Appendix H). The Phase I ESA includes and consolidates the findings of prior incremental Phase II subsurface investigations conducted on the site in 2019 and 2020. The 2021 Phase I ESA did not identify any Recognized Environmental Conditions (RECs), Controlled RECs (CRECs) or Historic RECs (HRECs). The 2021 Phase I ESA identified the following business environmental risks that can be addressed during construction in accordance with standard best management practices and applicable state and local guidance and regulations. Business Environmental Risks (BERs) warrant discussion, but do not qualify as RECs as defined by the ASTM Standard Practice E1527-13. These include but are not limited to, de minimis conditions. A de minimis condition is defined by the ASTM Standard as a condition that does not generally present a threat to human health or the environment.

Business Environmental Risks (BERs)

- **Asbestos Materials Management:** Due to the age of the buildings on APN 263-220-009, asbestos-containing building materials (ACM) may be present in site structures. As previously discussed, demolition of the subject property buildings would be required as part of the Project. Regardless of building construction date, the United States Environmental Protection Agency's (US EPA's) National Emission Standards for Hazardous Air Pollutants (NESHAP) requires an asbestos survey prior to demolition or renovation activities that may disturb asbestos containing materials (ACMs). This requirement may be enforced by federal, state and local regulatory agencies, and requires sampling all suspect ACMs to determine the presence or absence of asbestos prior to any renovation or demolition activities that may disturb them to prevent potential

exposure to workers, building occupants, and the environment. Compliance with SCAQMD Rule 1403, which is required as an existing regulation and standard condition prior to issuance of a demolition permit and is included as PPP HAZ-1, would reduce potential impacts related to ACMs to less than significant.

- **Lead Based Paint:** Due to the age of the buildings on APN 263-220-009, lead-based paint (LBP) may be present on or in site structures. As previously discussed, demolition of the subject property buildings would be required as part of the Project. The Phase I ESA recommends that the property owner consult with a certified Lead Risk Assessor to determine options for control of possible LBP hazards. Stringent local and State regulations may apply to LBP in association with building demolition/renovations and worker/occupant protection. Construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the federal and state Occupational Safety and Health Administration (OSHA) lead standard contained in 29 CFR 1910.1025 and 1926.62. With compliance to Cal/OSHA requirements, included as PPP HAZ-2, potential impacts related to LBP being released into the environment would be less than significant.

- **Hydraulic Lift Abandonment:** The existing building at 13906 Old 215 Frontage Road is equipped with one below-ground hydraulic lift. The lift may have been installed as early as 1950, when the building was constructed, and supports automotive repair activities. Due to the age of the equipment, AEI Consultants retrieved a soil sample from this area as part of their 2019 Phase II subsurface investigation. No polychlorinated biphenyls (PCBs) or other soil contaminants were identified in the retrieved during this investigation; therefore, the potential for a release of hydraulic fluid from the lift appears low. However, as included in MM HAZ-1, during Project construction, the Project Applicant would remove the hydraulic lift, over-excavate soil local to the hydraulic lift, and dispose of the removed materials consistent with local waste regulations, as recommended by the Phase I ESA.

Although neither RECs nor business environmental risks, the 2021 Phase I ESA also noted the following:

- *Past Agricultural Uses.* The Project site has been historically used for agricultural purposes. As such, there is a potential that agricultural chemicals such as pesticides, herbicides, and fertilizers were used onsite. Since the Project includes an industrial development and the entire site would be paved over or covered by improvements, direct contact with any remaining agricultural chemicals is unlikely. As such, impacts related to agricultural chemicals would be less than significant.

- *Underground Storage Tanks (USTs).* According to historical sources, the northern portion of the property (to the west of the present-day American Legion building) was utilized as a car storage lot and possible car service center from 1959 to 1995. In addition, a portion of the subject property was utilized as a used car tire shop in 1995. Based on the length of time (approximately 30 years) that the subject property was utilized as a car storage lot/service center, tire shop it is possible that petroleum hydrocarbons and polychlorinated biphenyl (PCBs) may have impacted the subsurface of the subject property. A Phase II ESA with an additional survey and soils testing was conducted for the property. The survey did not locate evidence of a former underground storage tank (UST) or subsurface excavation area. No evidence of former drains or clarifiers was observed. The soils analysis indicated that hydrocarbons and PCBs were below their respective laboratory method detection limits. As such, impacts related to USTs, hydrocarbons, and PCBs would be less than significant.

- *Former Gasoline Station and Associated Clarifier.* Based on the building layout and past use as an auto repair station, the existing commercial building appears to have been

developed with a gasoline service station for a period of time from the 1950s to the 1980s. No information to the status and operation of a UST system and/or the removal of USTs was on file with the City of Moreno Valley or the Riverside County Environmental Health Department. Based on the length of time that the subject property had been utilized as a gasoline service station, and absent the data confirming whether a release had occurred following the removal of any USTs, it is possible that petroleum hydrocarbons may have impacted the subsurface soils of the subject property. Additionally, the regulatory database indicates that clarifier sludge produced at the property has been disposed at a licensed disposal facility. The Phase I was unable to identify the clarifier location. As such, three subsurface investigations were conducted at the site in 2019, February 2020, and September 2020 to determine whether USTs remain in place and whether the subsurface soils in this area of the Project site have been impacted by prior fueling or automotive repair activities. Based on the cumulative results of the subsurface investigations (as summarized in Section 6.3 of the 2021 Phase I ESA), testing identified no detectable concentrations of petroleum hydrocarbons (TPH), volatile organic compounds (VOCs) or polychlorinated biphenyls (PCBs) in the suspected UST or clarifier areas. The Phase II investigations also found no evidence of a remaining UST system at the site. The most recent 2020 subsurface investigation report and 2021 Phase I ESA concluded that no further investigation was warranted in this portion of the property. However, in the unlikely event that construction, grading, or demolition activities reveal an unexpected feature or impact soils on the Project site, corresponding management of the feature would be performed at the expense of the Applicant as required by existing regulations, included as PPP HAZ-3.

Therefore, with implementation of PPP HAZ-1 through PPP HAZ-4 and MM HAZ-1, the Project would not 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 and impacts 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. Edgemont Elementary School is located approximately 0.8 miles north and Towngate Elementary School is located approximately 0.9 miles northeast of the Project site. Furthermore, as noted in Sections IX(a) and IX(b), the proposed Project is not anticipated to release hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes in significant quantities. Therefore, the proposed Project would not emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐

Response:

Less than Significant. The 2021 Phase I ESA prepared for the Project site included searches of federal, state, and local databases to determine whether hazardous materials sites were within and/or surrounding the Project site. Table HAZ-1 summarizes the properties within the Project site that are listed on hazardous materials databases. As shown on Table HAZ-1, two sites within the Project site are listed in databases.

Table HAZ-1 Hazardous Materials Sites within the Project Site

Property	Listed Database	Status	Significant?

13940 Highway 215	HAZNET	Association with disposal unspecified solvent, oil/water separation sludge, and asbestos containing waste. Compliant and no reported contaminations.	No
13913 Linda Court	HAZNET	Disposal of asbestos containing waste. Compliant and no reported contaminations.	No
13940 Highway 215	EMI	Permit to operate an automotive spray booth with solvent was issued in 1976 and appeared active until 1990. Compliant and no reported contaminations.	No

- HWTS (Hazardous Waste Tracking System) is maintained by the California Department of Toxic Substances Control (DTSC) and is a repository for hazardous waste identification numbering and manifest information.
- HAZNET database is extracted from the copies of hazardous waste manifests received annually year by the DTSC.
- EDR Historical Cleaners Database is a EDR search of national collections of business directories of potential dry cleaner sites.
- EMI is the SCAQMD emissions inventory data.
- Haulers is a registered waste tire haulers listing.

As discussed above in Threshold IX(b), the 2021 Phase I ESA identified no RECs, CRECs, or HRECs for the Project site and recommended no further investigation of the Project site based on the cumulative findings of three subsurface investigations. Therefore, potential hazards and impacts related to the development of the properties on the Project site that are listed on databases prepared pursuant to Government Code Section 65962.5 are less than significant.

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. The proposed Project site is located approximately 0.8-mile northwest of March Air Reserve Base/Inland Port Airport (MARB/IPA) and is within the boundaries of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (MARB/IPA LUCP). The MARB/IPA LUCP divides the area close to the airport into zones based on proximity to the airport and perceived risks. The MARB/IPA LUCP indicates the allowable uses, potential noise impacts, potential safety impacts, and density/intensity restrictions for each zone. The proposed Project site is partially in Zone B1 and C1 and is required to go through Airport Land Use Commission (ALUC) review and consistency determination. The Project site is partially in Accident Potential Zone II. On July 8, 2021, Riverside County ALUC found the Project consistent with the 2014 MARB/IPA LUCP subject to the conditions included in ALUC's approval letter. The Project would provide additional noise attenuation in order to reduce noise levels within office spaces to 45 CNEL for workers. There are no residential use proposed as part of the project. Therefore, the proposed Project would be a consistent use outlined in the MARB LUCP and the Project would not pose a safety hazard to people working in the area. As such, impacts would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Response:

Less than Significant. The proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of new driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed Project would not require full closure of Bay Avenue and Old 215 Frontage Road. Any temporary lane closures needed for utility connections or driveway construction would be required to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. Thus, implementation of the project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access or evacuation impacts to a less than significant level.

Operation

The City of Moreno Valley participates in the *County of Riverside Multi-Jurisdictional Local Hazard Mitigation Plan* (LHMP) which outlines requirements for emergency access and standards for emergency responses. Additionally, the Project would be required to comply with the City of Moreno Valley's Emergency Operations Plan.

Direct access to the Project site would be provided from Old 215 Frontage Road by two driveways and an emergency access driveway from Bay Avenue. The Project driveways and internal access would be required through the City's permitting procedures to meet the City's design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers). The Fire Department and/or Public Works Department would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), included as Municipal Code Chapter 8.36. As such, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and 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. The Project site is within an urbanized industrial area of the City of Moreno Valley. The Project site is bounded by single-family residences, vacant lots, and Bay Avenue to the north; commercial uses vacant lots to the east; single-family and multi-family residences and industrial uses to the south; and Old 215 Frontage Road and commercial uses to the west. The Project site is not adjacent to any wildland areas. According to the CAL FIRE Fire Hazard Severity Zone map, the Project site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2021). As a result, the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires and no impacts would occur.

Plans, Programs, or Policies (PPPs)

PPP HAZ-1: SCAQMD Rule 1403. Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that an asbestos survey has been conducted on the structures proposed for demolition. If asbestos is found, the Project applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule 1403. Rule 1403 regulations require that the following actions be taken: notification of SCAQMD prior to construction activity, asbestos removal in accordance

with prescribed procedures, placement of collected asbestos in leak-tight containers or wrapping, and proper disposal.

PPP HAZ-2: Lead. Prior to issuance of demolition permits, the Project applicant shall submit verification to the City Building and Safety Division that a lead-based paint survey has been conducted on the structures proposed for demolition. If lead-based paint is found, the Project applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint. Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, CCR Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

PPP HAZ-3: California UST Regulations. Underground storage tank (UST) repairs and/or removals will be conducted in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations). Any unauthorized release of hazardous materials will require release reporting, initial abatement, and corrective actions that will be completed with oversight from the Regional Water Quality Control Board, Department of Toxic Substances Control, Riverside County Environmental Health Division, South Coast Air Quality Management District, and/or other regulatory agencies, as necessary. Use of existing USTs will also have to be conducted (i.e., used, maintained and monitored) in accordance with the California UST Regulations (Title 23, Chapter 16 of the California Code of Regulations).

PPP HAZ-4: Environmental Best Management Practices. In the unlikely event that construction, grading or demolition activities reveal an unexpected feature or impacted site media on the project, corresponding management of the feature will be performed at the expense of the applicant with the support of a licensed and qualified environmental consultant and in accordance with existing and under the oversight of the appropriate state or local agency, such as the Regional Water Quality Control Board, Department of Toxic Substances Control, Riverside County Environmental Health Division, South Coast Air Quality Management District, and/or other regulatory agencies, as necessary.

Mitigation Measures

MM HAZ-1: Hydraulic Lift Abandonment. Per the recommendations of the Phase I ESA, during Project demolition activities, the Project Applicant will remove the existing onsite hydraulic lift and over-excavate soil local to the hydraulic lift. The Project would dispose of the removed materials consistent with local waste regulations and pursuant to 40 Code of Federal Regulations 761.

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. City of Moreno Valley General Plan Update, adopted July 2021
3. 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
4. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
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)

6. 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
7. 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
8. Phase I Environmental Site Assessments, AEI Consultants, Appendices H.
9. Phase II Environmental Site Assessments, AEI Consultants, Appendices I1-I2.
10. ALUC Project Approval Letter.

X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

Response:

Less than Significant.

Construction

Construction of the Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Pollutants of concern during Project construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants, such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste, could be spilled, leaked, or transported via stormwater runoff into adjacent drainages and into downstream receiving waters.

These types of water quality impacts during construction of the Project would be prevented through implementation of a SWPPP, included as PPP WQ-1, that is required to identify all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site. The SWPPP would include construction BMPs such as:

- Maximizing the permeable area,
- Incorporating landscaped buffer areas,
- Maximizing canopy interception with drought tolerant landscaping
- Installation of Low flow infiltration within sand filter zones
- Landscape design to capture and infiltrate runoff
- Conveying roof run-off into treatment control facilities

Adherence to the existing requirements and implementation of the appropriate BMPs as ensured through the City's construction permitting process, which would ensure that the Project would not violate any water quality standards or waste discharge requirements, potential water

quality degradation associated with construction activities would be minimized, and impacts would be less than significant.

Operation

The operation of six industrial warehouse buildings would introduce the potential for pollutants such as, chemicals from cleaners, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles and trucks. These pollutants could potentially discharge into surface waters and result in degradation of water quality. However, the proposed Project would be required to incorporate a WQMP with post-construction (or permanent) Low Impact Development (LID) site design, source control, and treatment control BMPs. The LID site design would minimize impervious surfaces and provide infiltration of runoff into landscaped areas.

The source control BMPs would minimize the introduction of pollutants that may result in water quality impacts; and treatment control BMPs that would treat stormwater runoff. The proposed Project would install an onsite storm drain system that would convey runoff to a pre-treatment unit then to an aboveground infiltration/detention system. This system would remove coarse sediment, trash, and pollutants (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides).

With implementation of the operational source and treatment control BMPs that are outlined in the preliminary WQMP (Appendix J) that would be reviewed and approved by the City during the permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not substantially degrade water quality. Therefore, impacts 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. The proposed Project is located in Box Springs Mutual Water Company's Perris North Groundwater Basin. Development of the proposed Project would introduce large areas of impervious surfaces to the site. However, the proposed Project would install an onsite storm drain system that would convey runoff to an underground infiltration/detention system or to two modular wetland systems that would capture, filter, and infiltrate runoff. In addition, the Project includes 50,402 SF of landscaping that would infiltrate stormwater onsite. As a result, the proposed Project would not decrease groundwater supplies or interfere substantially with groundwater recharge; and the Project would not impede sustainable groundwater management of the basin. Thus, the proposed Project would have a less than significant impact.

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.

Construction

As described previously, existing City regulations require the Project to implement a SWPPP during construction activities, that would implement erosion control BMPs, such as silt fencing,

fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding, etc. to reduce the potential for siltation or erosion.

Operation

The proposed Project would introduce impervious surfaces to the majority of the site. The pervious surfaces remaining on the site would be landscaped. There would be no substantial areas of bare or disturbed soil onsite subject to erosion. In addition, the Project is required to implement a WQMP that would provide operational BMPs to ensure that operation of the industrial warehouse would not result in erosion or siltation. With implementation of these regulations, impacts related to erosion or siltation onsite or off-site would be less than 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. As discussed in Section X(a) above, during construction a SWPPP would be implemented to control drainage and maintain drainage patterns across the proposed Project site. Also, as discussed in the drainage report prepared for the proposed Project (see Appendix K), drainage runoff from the Project site would be adequately handled by the proposed Project's drainage system. The Project would include three storm drain lines to convey onsite runoff to the underground chamber and modular wetland systems. The underground storage chambers and modular wetland systems would be sized for the appropriate design capture volume, and the proposed storm drain facilities would be able to capture runoff and the Project would not result in flooding on- or off-site. Therefore, 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. See response to Section X(c)(iii), above. Proposed drainage improvements would be sized to capture, filter, and infiltrate runoff from the 85th percentile 24-hour storm event. Development of the proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less than significant.

iv) Impede or redirect flood flows?	☐	☐	☐	☒

Response:
No Impact. According to FEMA's FIRM Flood Map, the Project site is classified as Zone X, 0.2 percent annual chance of flood hazard. Thus, the proposed Project would not impede or redirect flood flows, and impacts would not occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

Response:
No Impact. As discussed in X(c)(iv), the Project site is not located within a flood hazard area. Therefore, implementation of the Project would not risk the release of pollutants due to Project inundation in a flood hazard zone.

The Project site is located approximately 45 miles northeast of the Pacific Ocean and separated by the Santa Ana Mountains. Therefore, the Project is not located within a tsunami zone and no impacts would occur.

Similarly, a seiche is the sloshing of a closed body of water from earthquake shaking. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The Perris Reservoir is located approximately 6.75 miles southeast of the Project site. As such, the site is not located within a seiche zone. Therefore, no impacts would occur.

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

Response:

Less than Significant. As described previously, the Project would be required to have an approved SWPPP, which would include construction BMPs to minimize the potential for construction related sources of pollution. For operations, the proposed Project would be required to implement source control BMPs to minimize the introduction of pollutants; and treatment control BMPs to treat runoff. With implementation of the operational source and treatment control BMPs that would be required by the City during the permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not obstruct implementation of a water quality control plan.

Also as described previously, the Project site is within the Perris North groundwater basin. Because pumping in the groundwater basin is managed, which limits the allowable withdrawal of water from the basin by water purveyors, and the Project does not involve groundwater pumping (as water supplies would be provided by the City), the proposed Project would not conflict with or obstruct a groundwater management plan, and impacts would be less than significant.

Existing Plans, Programs, or Policies (PPPs)

PPP WQ-1: Prior to grading permit issuance, the project developer shall have a Stormwater Pollution Prevention Plan (SWPPP) prepared by a QSD (Qualified SWPPP Developer) pursuant to the Municipal Code Section 8.21.170. The SWPPP shall incorporate all necessary Best Management Practices (BMPs) and other City requirements to comply with the National Pollutant Discharge Elimination System (NPDES) requirements to limit the potential of polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by City of Redlands staff or its designee to confirm compliance.

Mitigation Measures

None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.7 – Water Quality
     - Figure 6-4 – Flood Hazards
   - 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. Western Municipal Water District 2015 Urban Water Management Plan. https://www.wmwd.com/DocumentCenter/View/3162/Western_2015-UWMP_Final_Body-Only?bidId=
7. Preliminary Water Quality Management Plan, SB&O Inc., May 2021, Appendix J.
8. Preliminary Drainage Report, SB&O Inc., May 2021, Appendix K.

XI. LAND USE AND PLANNING – Would the project:

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

Response:

No Impact. Surrounding land uses consist of single-family and multi-family residences and commercial uses to the south; vacant land and commercial uses to the east; commercial uses and Old 215 Frontage to the west; and single-family residences on Bay Avenue to the north. The proposed Project is consistent with the General Plan and zoning designations for the site and would not introduce roadways or other infrastructure improvements that would bisect or transect the Project site or surrounding area. The proposed industrial warehouse uses would be compatible with the surrounding land uses, as it would introduce new industrial warehouse uses in an area with similar uses. As such, the proposed Project would not physically divide an established community and no impacts 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. The documents regulating land use for the Project site and immediate vicinity are the City's General Plan and municipal code. The proposed Project's relationship to these planning documents is described below.

General Plan. The Project site is currently designated Business Park/Light Industrial (BP) by the Moreno Valley General Plan. As discussed in the General Plan, the primary purpose of areas designated as Business Park/Light Industrial is to provide for manufacturing, research, and development, warehousing and distribution, as well as office and support commercial activities. The maximum density for Business Park/Light Industrial developments is 1.00 FAR. The proposed Project would have a FAR of 0.40. No impact related to the General Plan land use designation would occur from implementation of the Project.

Table LU-1: General Plan Consistency

General Plan Policy	Project Consistency
Land Use Element	
LCC.1.1: Foster a balanced mix of employment, housing, educational, entertainment, and recreational uses throughout the city to support a complete community.	**Consistent.** The Project would provide additional employment opportunities in order to ensure a jobs-housing balance in the City.
LCC.1-2: Expand employment opportunities locally and provide sufficient lands for commercial, industrial, residential and public/quasi-public uses while ensuring that a high quality of life is maintained in Moreno Valley.	**Consistent.** The Project would provide additional employment opportunities in order to ensure a jobs-housing balance in the City in an area designated for industrial development. Additionally, as discussed in Section I, Aesthetics, the Project would be set back and provide ample screening from adjacent residences.

LCC.1-3: Locate manufacturing, logistics and industrial uses in areas with good access to the regional transportation network near the periphery of the city.	**Consistent.** The Project would locate six industrial warehouse buildings adjacent to the I-215 and provide access to the regional transportation network.
LCC.1-11: Require that new development be compatible with the standards for land uses, density and intensity specified in the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (March ALUC Plan).	**Consistent.** As discussed in Section IX(e), the Project was reviewed by the ALUC and determined to be consistent with the MARB/IPA LUCP.
Circulation Element	
C.2-5: Prohibit points of access from conflicting with other existing or planned access points. Require points of access to roadways to be separated sufficiently to maintain capacity, efficiency, and safety of the traffic flow	**Consistent.** As discussed further in Section XVII, Project driveways would be adequately spaced to ensure safety. The proposed Project would be reviewed by the City in order to ensure access points are designed per City standards.
C.2-7: Plan access and circulation of each development project to accommodate vehicles (including emergency vehicles and trash trucks), pedestrians, and bicycles.	**Consistent.** As discussed further in Section XVII, the Project would include two driveways on Old 215 Frontage Road that would be utilized for passenger cars and trucks. Additionally, the Project would include sidewalks along the Old 215 Frontage Road to ensure pedestrian access to the site. The Project would include a fire/emergency access from Bay Avenue.
C.2-8: For developments fronting both sides of a street, require that streets be constructed to full width. Where new developments front only one side of a street, require that streets be constructed to half width plus an additional 12-foot lane for opposing traffic, whenever possible. Additional width may be needed for medians or left and/or right turn lanes.	**Consistent.** The Project would include repaving of the Old 215 Frontage Road to its half width. The Project would not require any improvements along Bay Avenue, except for connecting pavement and new driveway.
C.3-4: Require development projects to complete traffic impact studies that conduct vehicle miles traveled analysis and level of service assessment as appropriate per traffic impact study guidelines	**Consistent.** As discussed further in Section XVII, per the City's Traffic Impact Study guidelines, the Project screens out of a Vehicle Miles Traveled (VMT) analysis. As such, the Project would have a less than significant impact on VMT. A Traffic Impact Analysis (TIA) was prepared for the Project at the request of the City and is attached as Appendix M.
C.4-4: All new developments shall provide sidewalks in conformance with the City's streets cross-section standards, and applicable policies for designated urban and rural areas.	**Consistent.** The proposed Project would include development of a new sidewalk and curb along its Old 215 Frontage Road frontage. Sidewalks would be reviewed by the City to ensure plans meet the City's cross-section standards.
Parks & Public Services	
PPS.1-2: Require that proponents of new development projects contribute to the acquisition and development of adequate parks and recreational facilities within the community, either through the dedication of park land or the payment of in-lieu fees.	**Consistent.** The proposed Project would include the payment of all applicable in-lieu fees for the provision of parkland, as conditioned by the City.

PPS.3-6: Continue to require that new development make a fair share funding contribution to ensure the provision of adequate police and fire services	**Consistent.** The proposed Project would include the payment of all applicable fair share funding for police and fire services, as conditioned by the City.
PPS.3-7: Continue to engage the Police and Fire Departments in the development review process to ensure that projects are designed and operated in a manner that minimizes the potential for criminal activity and fire hazards and maximizes the potential for responsive police and fire services.	**Consistent.** The proposed Project would be reviewed by the City's police and fire departments during its development review process. The Project would include a gated emergency access road from Bay Avenue to ensure adequate emergency access for vehicles. Additionally, the Project is required to comply with the provisions of the California Fire Code, which would reduce hazards related to fire.
PPS.4-3: Prior to the approval of any new development application, continue to require "will serve" letters from utility providers demonstrating that adequate water and septic or sewer service capacity exists or will be available to serve the proposed development in a timely manner.	**Consistent.** The proposed Project would be adequately served by utility providers, as further discussed in Section XIX. Additionally, the Project Applicant would provide the City Planning Department with will serve letters for all needed utilities prior to approval.
Safety	
S.1-1: Continue to restrict the development of habitable structures within Alquist-Priolo Earthquake Fault Zones consistent with State law.	**Consistent.** As previously discussed, the proposed Project is not located within an Alquist-Priolo zone.
S.1-9: Encourage project designs that minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development (LID) strategies, and utilize best management practices (BMPs) to reduce stormwater runoff and minimize increases in downstream runoff resulting from new development.	**Consistent.** The proposed Project would implement LID strategies and BMPs to reduce stormwater runoff, as discussed in Section X. The Project would include an underground capture basin and two onsite modular wetlands to retain and filter stormwater
S.1-10: Through development agreements and compliance with adopted master drainage plans and existing regulations, require that new development provide necessary storm drainage improvements and ensure that upstream stormwater generators fully address stormwater needs on their property.	
S.1-23: Continue to require remediation of hazardous material releases from previous land uses as part of any redevelopment activities.	**Consistent.** As required by MM HAZ-1 and MM HAZ-2, the Project Applicant would fund soils testing and remove contaminated soils if any are uncovered onsite during construction activities.
Noise	
N.1-3: Apply the community noise compatibility standards (Table N-1) 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.	**Consistent.** The proposed Project would place industrial uses within the MARB/IPA LUCP Zone B1 and C1. Proposed office spaces would provide attenuation in order to meet required 45 CNEL indoor noise levels. As such, the Project would be compatible the MARB/IPA LUCP and would not expose Project workers to excessive noise exposure.

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.	**Consistent.** As discussed further in Section XIII, a Noise Impact Analysis was prepared for the proposed Project. The Project would include 14-foot concrete screening walls that would limit noise impacts to adjacent sensitive receptors. As discussed in the Noise Impact Analysis, operational noise impacts would be less than significant. The Project would not expose adjacent sensitive receptors to excessive noise levels.
N.1-5: Noise impacts should be controlled at the noise source where feasible, as opposed to at 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.	
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.	
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.	**Consistent.** As discussed further in Section XIII, a Noise Impact Analysis was prepared for the proposed Project. As discussed in the Noise Impact Analysis, with inclusion of MM NOI-1, impacts related to noise and vibration would be less than significant.
Environmental Justice	
EJ.1-6: Ensure that construction and grading activities minimize short-term impacts to air quality by employing appropriate mitigation measures and best practices.	**Consistent.** As discussed in Section III, construction emission levels would be below the thresholds established by the SCAQMD. Therefore, Project air quality impacts during construction and grading would be minimized.
EJ.1-7: Require new large commercial or light industrial projects to develop and implement a plan to minimize truck idling in order to reduce diesel particulate emissions.	**Consistent.** The Project would be required to comply with CARB Rule 2485, which limits diesel-fueled vehicle idling to five minutes. The Project would include signs at loading docks to ensure compliance with Rule 2485.
EJ.1-13: Through the development review process, ensure that hazardous material-affected soil, groundwater, or buildings will not have the potential to adversely affect the environment or the health and safety of site occupants.	**Consistent.** As required by MM HAZ-1 and MM HAZ-2, the Project Applicant would fund soils testing and remove contaminated soils if any are uncovered onsite during construction activities.

Municipal Code

According to Municipal Code Chapter 9.05, the Project site is zoned Business Park (BP). As detailed previously in Table AES-1, the proposed Project would be consistent with the development standards for the BP zoning district. Thus, the proposed Project would not conflict with any applicable zoning regulations adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be less than significant.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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. The Project site is primarily vacant and partially developed with a single-family residence and commercial buildings and is not used for mineral extractions. Furthermore, the Project site has a classification of MRZ-3, indicating areas of undetermined mineral resource significance and is planned for light industrial uses. Therefore, development of the proposed Project would not result in impacts related to mineral resources.

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

Response:

No Impact. No sites have been designated as locally-important mineral resource recovery sites on any local plan within the City of Moreno Valley. Therefore, implementation of the proposed Project would not result in the loss of availability of a locally-important mineral resource recovery site as delineated on a local plan. Thus, development of the proposed Project would not have a significant impact on mineral resources.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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
6.

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

Response:

Less than Significant.

City of Moreno Valley Municipal Code

Section 9.10.010 Performance Standards - Purpose and Intent. The purpose and intent of this chapter is to explicitly describe the location, configuration, design, amenities, operation and other standards for proposed development projects that may impact the surrounding neighborhood. The performance standards set maximum tolerance limits on certain adverse effects created by any use or development of land.

Section 9.10.030 Performance Standards – Exemptions. The following uses or activities are exempt from the provisions of this chapter:

A. Emergency equipment, vehicles, devices and activities.

B. Temporary construction, maintenance, or demolition activities between the hours of seven a.m. and seven p.m.

Section 9.10.170 Performance Standards – Vibration. No vibration shall be permitted which can be felt at or beyond the property line.

Section 11.80.030 Prohibited Acts

A. General Prohibition. It is unlawful and a violation of this chapter to maintain, make, cause, or allow the making of any sound that causes a noise disturbance, as defined in Section 11.80.020.

B. Sound causing permanent hearing loss.

1. Sound level limits. Based on statistics from the Center for Disease Control and Prevention and the National Institute for Occupational Safety and Health, Table 1 and Table 1-A specify sound level limits which, if exceeded, will have a high probability of producing permanent hearing loss in anyone in the area where the sound levels are being exceeded. No sound shall be permitted within the city which exceeds the parameters set for in Tables 11.80.030-1 [see Table N-1] and 11.80.030-1-A [see Table N-2] of this chapter:

Table N-1: City of Moreno Valley Maximum Continuous Sound Levels

Duration per Day (Continuous Hours)	Sound Level [dB(A)]
8	90
6	92

4	95
3	97
2	100
1.5	102
1	105
.5	110
.25	115

Source: City of Moreno Valley Municipal Code Section 11.80.030.

Table N-2: City of Moreno Valley Maximum Impulsive Sound Levels

Number of Repetitions per 24-Hour Period	Sound Level [dB(A)]
1	145
10	135
100	125
Source: City of Moreno Valley Municipal Code Section 11.80.030.	

C. Nonimpulsive Sound Decibel Limits. No person shall maintain, create, operate or cause to be operated on private property any source of sound in such a manner as to create any nonimpulsive sound which exceeds the limits set forth for the source land use category (as defined in Section 11.80.020) in Table 11.80.030-2 [see Table N-3] when measured at a distance of two hundred (200) feet or more from the real property line of the source of the sound, if the sound occurs on privately owned property, or from the source of the sound, if the sound occurs on public right-of-way, public space or other publicly owned property. Any source of sound in violation of this subsection shall be deemed prima facie to be a noise disturbance.

Table N-3: City of Moreno Valley Maximum Sound Levels for Source Land Uses

Residential		Commercial	
Daytime[1]	Nightime[2]	Daytime[1]	Nightime[2]
60	55	65	60

Notes:
[1] Daytime defined as 8:00 a.m. to 10:00 p.m.
[2] Nighttime define as 10:01 p.m. to 7:59 a.m. the following day.
Source: City of Moreno Valley Municipal Code Section 11.80.030.

D. Specific Prohibitions. In addition to the general prohibitions set out in subsection A of this section, and unless otherwise exempted by this chapter, the following specific acts, or the causing or permitting thereof, are regulated as follows:

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 8 p.m. and 7 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. This section shall not apply to the use of power tools as provided in subsection (D)(9) of this section.

Existing Noise Levels

As detailed in the Noise Impact Analysis (Appendix L), to identify the existing ambient noise level environment, long term noise level measurements were taken at three locations in the Project study area. The short-term noise level measurements were positioned as close to the

nearest sensitive receiver locations as possible to assess the existing ambient noise levels surrounding the Project site. The existing noise levels are provided in Table N-4.

Table N-4: Existing Ambient Noise Level Measurements

Site No.	Site Description	Average (dBA L_{eq})		1-hr Average (dBA L_{eq}/Time)		Weighted-Average[3] (dBA CNEL)
		Daytime[1]	Nighttime[2]	Minimum	Maximum	
A	Located on the north side of the project site, on the shared fence with the home at 21773 Bay Avenue, approximately 30 feet south of Bay Avenue centerline.	61.4	53.5	47.6 2:34 a.m.	64.5 6:33 p.m.	63.0
B	Located on the western portion of project site on the north side fence for American Legion, approximately 330 feet east of the centerline for Old 215 Frontage Road.	58.6	50.7	44.6 4:30 a.m.	61.8 12:03 p.m.	60.1
C	Located near the southeast corner of the project site on a power pole, approximately 85 feet north of the centerline for Linda Court.	56.9	48.2	43.2 2:30 a.m.	61.7 12:01 p.m.	57.7

Notes:
[1] Daytime defined as 8:00 a.m. to 10:00 p.m. (Section 11.80.020 of the Municipal Code)
[2] Nighttime define as 10:01 p.m. to 7:59 a.m. (Section 11.80.020 of the Municipal Code)
[3] The weighted-average noise level (dBA CNEL) includes an additional 4.77 dBA noise penalty to account for the evening noise sensitive hours of 7 p.m. to 10 p.m. and an additional 10 dBA penalty to account for the nighttime noise sensitive hours of 10 p.m. to 7 a.m.
Noise measurements taken between Friday, May 14, 2031 and Saturday, May 15, 2021.
Source: Vista Environmental, 2021 (Appendix L)

Construction

As described above, construction noise sources are regulated within the City of Moreno Valley under section 11.80.030 which prohibits construction activities other than between the hours of 7:00 a.m. to 8:00 p.m. Monday through Friday, excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturday. To evaluate whether the Project would generate potentially significant short-term noise levels at offsite sensitive receiver locations, a construction-related noise threshold of 60 dBA Leq (Vista, 2021).

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. Construction noise associated with the Project was calculated utilizing methodology presented in the FTA Transit Noise and Vibration Impact Assessment Manual (2018) together with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the Project site, which are listed in Table N-5 below.

For the purposes of the Noise Impact Analysis, the closest sensitive receivers are located approximately 4 feet north of the Project site and are shown in Figure N-1, below. For each phase of construction, all equipment operating in unison was analyzed at 200 feet from the Project's property line pursuant to applicable Municipal Code Sections. Construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of construction equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings.

Table N-5 Worst-Case Scenario Noise Levels at Sensitive Receptors

Construction Phase	Construction Noise Level[1] (dBA Leq) at:			
	1 – Northwest	2 – North	3 – East	4 – Southeast
Demolition	58	59	57	55
Site Preparation	59	60	58	56
Grading	58	59	57	56
Building Construction	58	60	57	56
Paving	53	54	52	50
Painting	45	46	44	42
City's Noise Threshold[2]	**60**	**60**	**60**	**60**
Exceed Thresholds?	**No**	**No**	**No**	**No**

Notes:
[1] The construction noise levels were calculated at a minimum of 200 feet from the project's property line pursuant to Section 11.80.030(C) of the Municipal Code. In order to account for the homes, outbuildings and fences that are located within 200 feet of the analyzed property lines, 10 dB of shielding was added to the RCNM Model. The locations of Receptors 1 – 4 are shown above in Figure N-1
[2] City Noise Threshold obtained from Section 11.80.030(C) of the Municipal Code.
Source: Vista Environmental, 2021 (Appendix L)

Figure N-1 Sensitive Receiver Locations

As shown in Table N-5, the unmitigated construction noise levels, when combined with existing ambient noise levels, are expected to range from 42 to 60 dBA L_{eq}, which would be less than the 60 dBA L_{eq} significance threshold. Therefore, the noise impacts due to Project construction noise would be less than significant.

Operational Noise

Off-Site Vehicle Noise

Potential noise impacts associated with the operations of the proposed Project are a result of Project-generated vehicular traffic on the Project vicinity roadways. The noise impacts related to vehicular traffic were modeled in the Noise Impact Analysis using a version of the Federal

Highway Administration (FHWA) Traffic Noise Prediction Model (FHWA-RD-77-108), as modified for CNEL and the "Calveno" energy curves. The Opening Year (2022) without Project and Opening Year (2023) with Project average daily traffic (ADT) noise levels were calculated.

Table N-6 shows that at Project buildout, in 2023, there would be 0.0 to 0.4 dBA increase in noise due to the increase of Project-related traffic on roadways in the Project vicinity. As the Project-related increase in traffic noise does not exceed 1 to 5 dBA, impacts related to operational noise from traffic would be less than significant.

Table N-6: Project Completion Year 2023 Conditions Project Traffic Noise Contributions

		dBA CNEL at Nearest Receptor[1]			Increase Threshold [2]
Roadway	Segment	Year 2023	Year 2023 Plus Project	Project Contribution	
Old 215 Frontage Road	North of Cottonwood Avenue	64.7	64.9	0.2	+1 dBA
Old 215 Frontage Road	North of Bay Avenue	64.1	64.4	0.3	+2 dBA
Old 215 Frontage Road	South of Bay Avenue	60.3	60.7	0.4	+2 dBA
Cottonwood Avenue	East of Old 215 Frontage Road	58.0	58.2	0.2	+3 dBA
Bay Avenue	East of Old 215 Frontage Road	53.2	53.4	0.2	+5 dBA
Alessandro Boulevard	East of Old 215 Frontage Road	66.0	66.0	0.0	+1 dBA

Notes:
[1] Distance to nearest residential use shown in **Error! Reference source not found.** N-1, does not take into account existing noise barriers.
[2] Increase Threshold obtained from the FTA's allowable noise impact exposures detailed Appendix L FHWA Traffic Noise Prediction Model FHWA-RD-77-108.
Source: Vista Environmental, 2021 (Appendix L)

Onsite Noise

The operation of the proposed Project would create an increase in onsite noise levels from truck operations, including truck loading/unloading activities, rooftop mechanical equipment, forklift activities, and automobile parking lot activities. Section 11.80.030(C) of the City's Municipal Code limits noise levels at the nearby residential properties to 60 dBA between 8:00 a.m. and 10:00 p.m. and 55 dBA between 10:01 p.m. and 7:59 a.m. the following day.

In order to determine the noise impacts from the operation of rooftop mechanical equipment, automobile parking lots, forklifts, and truck loading/unloading activities, reference noise measurements were taken of each noise source and the reference noise measurements output files are provided in Appendix L. In order to account for the noise reduction provided by the proposed 14-foot high sound wall on the north, east, and south property lines, the wall attenuation equations from the *Technical Noise Supplement to the Traffic Noise Analysis Protocol* (TeNS), prepared by Caltrans, September 2013, were utilized. As shown in Table N-7, the Project's worst-case operational noise from the simultaneous operation of all noise sources on the project site would create a noise level of 52 dBA at Receptor 1, which is located northwest of the project site. The worst-case operational noise level of 52 dBA would be within the City's residential noise standards of 60 dBA between 8:00 a.m. and 10:00 p.m. and 55 dBA between 10:01 p.m. and 7:59 a.m. the following day. Therefore, the onsite operational noise impacts would be less than significant.

Table N-7: Operational Noise Levels at the Nearby Homes

Noise Source	Operational Noise Level[1] (dBA Leq)			
	1 – Northwest	**2 – North**	**3 – East**	**4 – Southeast**
Rooftop Equipment[2]	26	30	39	27
Auto Parking Lot[3]	28	18	18	17
Onsite Truck Operations[4]	40	44	23	28
Forklift[5]	51	39	34	34
Combined Noise Level	**52**	**45**	**41**	**36**
City Noise Standards[6] (day/night)	**60/55**	**60/55**	**60/55**	**60/55**
Exceed City Noise Standards?	**No/No**	**No/No**	**No/No**	**No/No**

Notes:
[1] The calculated noise levels account for the noise reduction provided by the proposed 12 foot high wall on the north, east and south sides of the project site. The locations of Receptors 1 – 4 are shown above in Figure 5.
[2] Rooftop equipment is based on a reference noise measurement of 65.1 dBA at 6 feet.
[3] Parking lot is based on a reference noise measurement of 63.1 dBA at 5 feet.
[4] Onsite truck operations is based on a reference noise measurement of 63.3 dBA at 10 feet.
[5] Forklift activities is based on a reference noise measurement of 74.4 dBA at 10 feet.
[6] The City noise standards are from Table 11.80.030-2 of the Municipal Code
Noise calculation methodology from Caltrans, 2013 (see Appendix E).
Source: Vista Environmental, 2021 (Appendix L).

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

Response:
Less than Significant with Mitigation Incorporated.

Construction

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. The proposed Project's construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.
- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Ground-borne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by the Federal Transit Administration (FTA). Construction activities that would have the potential to generate low levels of ground-borne vibration within the Project site include grading.

Table N-8: Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level (Lv) at 25 feet
Hydromill (slurry wall)	0.008 in soil	66
	0.017 in rock	75

Hoe ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58
Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, 2018.		

The nearest vibration sensitive receptors to the project site are the homes located as near as four to five feet from the north side of the Project site. Since the City's Municipal Code does not provide a quantifiable vibration level for construction activities, Caltrans guidance has been utilized, which defines the threshold of perception from transient sources at 0.25 inch per second PPV. The primary source of vibration would be from operation of a bulldozer, which would create a vibration level of 0.089 inch per second at 25 feet, as shown in Table N-8. Based on typical propagation rates, the vibration level at the nearest offsite residential structure (5 feet away) would be 0.52 inch per second PPV. The vibration level at the nearest offsite home would exceed the 0.25 inch per second PPV threshold detailed above. Therefore, MM NOI-1 has been included to require the use of a small bulldozer or other type of equipment for grading activities that occur within 20 feet of any offsite home. As shown in Table N-8, a small bulldozer would create a vibration level of 0.003 inch-per-second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest home (4-5 feet away) would be 0.018 inch per second PPV, which would be below the 0.25 inch per second PPV threshold detailed above. Therefore, with implementation of MM NOI-1, vibration impacts during construction would be less than significant.

Operation

The proposed Project would consist of development of a business park with six buildings that total 196,759 SF with a parking lot and trailer parking yard. The nearby homes are located as near as 10 feet north from where trucks would operate on the Project site.

Caltrans has done extensive research on vibration level created along freeways and State Routes and their vibration measurements of roads have never exceeded 0.08 inches per second PPV at 15 feet from the center of the nearest lane, with the worst combinations of heavy trucks. As detailed above, truck activities would occur onsite as near as 10 feet from the homes to the north. Based on typical propagation rates, the vibration level at the nearest proposed homes would be 0.12 inch per second PPV. Therefore, vibration created from operation of the proposed project would be within the 0.25 inch per second PPV threshold of detailed above. As such, operational vibration impacts would be less than significant.

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:

Less than Significant. The proposed Project would not expose people residing or working in the project area to excessive noise levels from aircraft. The nearest airport is MARB/IPA, where the runway is located approximately 1.5 miles southeast of the Project site. According to Figure 4-13.3 of the Moreno Valley General Plan Draft EIR, the Project site is located within the 65 dBA CNEL noise contours of March Air Reserve Base. Business park land uses are an allowed use within the 65 dBA CNEL noise contours of an airport. As such, the proposed project would be exposed to a less than significant impact from aircraft noise.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

MM NOI-1: The Project applicant shall require that all construction contractors restrict the operation of any large bulldozers that is powered by a greater than 150 horsepower engine from operating within 20 feet of any off-site residential structure. The Project applicant shall require the use of a small bulldozer (i.e., D1, D2, or D3 dozers) or other type of equipment that is less than 150 horsepower to perform all grading activities that are located within 20 feet of any off-site residential structure.

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)
6.

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. The proposed Project would not directly result in unplanned population growth because it does not propose any residential dwelling units and development of the Project would be consistent with the General Plan land use and zoning designations for the site, which are used by both local and regional agencies to determine anticipated growth. For purposes of analysis, employment estimates were calculated using data and average employment density factors utilized in the County of Riverside General Plan. The General Plan estimated that Business Park businesses would employ one worker for every 600 SF of building area. Therefore, the Project would employ approximately 328 employees. Southern California Association of Governments (SCAG) estimates that the City of Moreno Valley will increase the amount of jobs by 29,400 jobs between 2016 and 2045. Therefore, the Project's employees represent approximately 1.1% of job growth projected by SCAG and the Project is within the planned population growth analyzed by SCAG, and in keeping with the City's General Plan growth projections. Therefore, impacts related to unplanned population growth would not occur from the Project.

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

Response:

No Impact. The proposed Project would replace one existing single-family residence with six industrial warehouses. However, the Project site is designated for Business Park uses through the General Plan and municipal code and is not planned to provide for residential uses. In addition, the California, Department of Finance estimates that the City of Moreno Valley has a vacancy rate of 6.1 percent, which is approximately 12,774 vacant housing units. Therefore, the single family residential unit that would be demolished for the Project would not necessitate the construction of replacement housing elsewhere. As such, no impacts would occur.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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
4. Riverside County General Plan
5. California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark, https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/

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. The Moreno Valley Fire Department (MVFD) would provide fire protection services to the proposed Project. MVFD station number 6, located at 22250 Eucalyptus Avenue, is the closest fire station to the Project site. Fire station 6 is approximately 1.6 roadway miles or six minutes away from the Project site. As part of the permitting process, the Project plans would be reviewed by the City's Fire Department and the Building and Safety Department (part of the Community Development Department) to ensure that the Project plans meet the fire protection requirements. Additionally, the proposed industrial warehouses would be required to comply with City fire suppression standards including current California Building Code and adequate fire access.

Due to the small increase in onsite people that would occur from implementation of the Project, an incremental increase in demand for fire protection and emergency medical services would occur. However, the increase in employees onsite is limited, and would not increase demands

such that the existing fire station would not be able to accommodate servicing the Project in addition to its existing commitments, and provision of a new or physically altered fire station would not be required that could cause environmental impacts.

Additionally, as discussed in the General Plan Program EIR, the City requires payment of a Development Impact Fee to assist the City in providing for fire protection services. Payment of the Development Impact Fee would ensure that the Project provides fair share funds for the provision of additional public services, including fire protection services, which may be applied to fire facilities and/or equipment, to offset the incremental increase in the demand for fire protection services that would be created by the Project. Therefore, impacts related to fire protection services from the proposed Project would be less than significant.

ii) Police protection? ☐ ☐ ☒ ☐

Response:

Less than Significant. Police protection services would be provided to the Project by the Moreno Valley Police Department (MVPD) and the Riverside County Sheriff's Department. MVPD operates out of the Moreno Valley Station, located at 22850 Calle San Juan De Los Lagos. The station is approximately 1.3 roadway miles or 4 minutes away from the Project site. Per the City's General Plan, the City has a police staffing standard of at least 1 officer per 1,000 residents. Calls to the MVPD are prioritized and assigned by urgency, from greatest urgency (Priority 1) through non-emergency calls (Priority 3). Table PS-1 shows the target and average response times for Priority 1 through Priority 3 responses.

Table PS-1: MVPD Response Times

Call Type	Target	Response Time (2019)
Priority 1 Calls	6 minutes	6:37
Priority 2 Calls	15 minutes	22:01
Priority 3 Calls	35 minutes	42:46

Due to the small increase in onsite people that would occur from implementation of the Project, an incremental increase in demand for police protection would occur. However, the Project would include security lighting and other security measures. In addition, the increase in demand would be limited, and would not require provision of a new or physically altered police facility that could cause environmental impacts or require the retention of an additional police officer per the City's staffing standard and impacts would be less than significant.

Additionally, the Project would be required to pay Development Impact Fees which would assist the City in providing for police protection services. Payment of the Development Impact Fee would ensure that the Project provides its fair share of funds for additional police protection services, which may be applied to sheriff facilities and/or equipment, to offset the incremental increase in the demand that would be created by the Project.

iii) Schools? ☐ ☐ ☒ ☐

Response:

Less than Significant. The Project does not include any housing and would not directly create additional students to be served by the Moreno Valley Unified School District. Thus, the Project would not generate the need for new or physically altered school facilities and impacts would be less than significant. Additionally, the Project would be required to contribute fees to the Val Verde Unified School District in accordance with the Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50). Pursuant to Senate Bill 50, payment of school impact fees constitutes complete mitigation under CEQA for Project-related impacts to school services. As such, impacts would be less than significant.

iv) Parks? ☐ ☐ ☒ ☐

Response:

Less than Significant. As noted previously in the response to Issue XIV(a), the Project would not create an additional need for housing; and would not directly increase the residential population of the City and generate additional need for parkland. Additionally, each building would provide 500 SF of break areas for Project employees. Thus, impacts would be less than significant. In addition, the payment of development impact fees per City conditions would further reduce any Project impacts related to parks.

v) Other public facilities?	☐	☐	☒	☐

Response:

Less than Significant. As noted in the response to Issue XIV(a) above, development of the Project would not result in a direct increase in the population of the Project area and would not increase the demand for public services, including public health services and library services which would require the construction of new or expanded public facilities. Therefore, impacts related to other public services would be less than significant. In addition, the Project would be required to provide payment of the Development Impact Fee to assist the City in providing public services pursuant to City conditions.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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

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. The Project would not cause a substantial physical deterioration of any park facilities or would accelerate the physical deterioration of any park facilities because the Project does not include residential dwelling units which would increase the residential population that would use parks. Hence, impacts would be less than significant. In addition, the payment of development impact fees per standard City requirements would reduce any indirect Project impacts related to recreational facilities. Thus, impacts to recreation would be less than significant.

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:

No Impact. As noted in the response to Issue XVI(a) above, the Project does not propose any recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment. In addition, no onsite or offsite parks or recreational improvements are proposed or required as part of the Project. Therefore, no impacts would occur.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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

XVII. TRANSPORTATION – Would the project:

a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

Response:

Less than Significant. The proposed Project includes the removal of the existing single-family residence and commercial tire shop on the Project site and construction of six (6) warehouse buildings totaling 196,759 SF. Vehicular access to the Project site would be provided by two ingress and egress driveways on Old 215 Frontage Road and a gated emergency fire access road on Bay Avenue. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project area. The proposed Project includes internal driveways that would provide circulation for truck and passenger car traffic. A Traffic Impact Assessment (TIA), dated August 2021, was prepared for the proposed Project by Translutions (see Appendix M). As shown on Table T-1, the proposed Project is

forecast to generate approximately 675 daily trips with 89 trips during the AM peak hour and 83 trips during the PM peak hour.

Table T-1: Project Trip Generation

Land Use	SF	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Generation Rates								
General Light Industrial[1]	102,974	4.960	0.616	0.084	0.700	0.082	0.584	0.630
Warehousing[2]	94,022	1.740	0.131	0.039	0.170	0.051	0.139	0.190
Proposed Project Trip Generation								
Passenger Cars		512	59	10	68	11	54	65
2-axle Trucks		50	6	1	7	1	6	6
3-axle Trucks		31	3	0	4	0	3	4
4+ axle Trucks		82	8	2	10	2	7	8
Total Proposed		**675**	**76**	**13**	**89**	**14**	**70**	**83**

Source: Translutions, 2021 (Appendix M)
[1]ITE Land Use Code: 110 General Light Industrial
[2]ITE Land Use Code: 150 Warehousing

Source: Translutions, 2021 (Appendix M)

The Project site has been designed to construct onsite roadway improvements consistent with the City guidelines. The proposed Project would also repave Old 215 Frontage Road to its half width and pay Development Impact Fees as conditioned by the City. The fees shall be collected and utilized as needed by the City to construct the improvements necessary to maintain the required Level of Service (LOS) and build or improve roads to their build-out level.

Alternative Transportation

The Riverside Transit Agency (RTA) operates Route 20 along Alessandro Boulevard with a bus stop at the corner of Old 215 Frontage Road and Alessandro Boulevard. Furthermore, an existing Class II bicycle lane exists on Alessandro Boulevard. Additionally, the Project would include a sidewalk along the Old 215 Frontage Road. The proposed Project would improve the existing pedestrian access to nearby locations, including the existing RTA bus stop. Therefore, the proposed Project would also not conflict with pedestrian facilities. Overall, Project impacts to transit, bicycle, and pedestrian facilities would be less than significant.

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

Response:

Less than Significant. Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the State CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. SB743 specified that the new criteria should promote the reduction of GHGs, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3 was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

State CEQA Guidelines Section 15064.3 - Determining the Significance of Transportation Impacts states that VMT is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT.

The City of Moreno Valley TIA Guidelines for CEQA were consulted to determine whether a VMT analysis would be required for the Project. Based on the scoping criteria from the City of Moreno Valley TIA Guidelines and evaluation using the Western Riverside Council of Governments (WRCOG) VMT Screening Tool, the Project would have a less than significant

impact on VMT because it is located within a low VMT area (Appendix M). The WRCOG Screening Tool identifies that the jurisdictional average home-based VMT per worker of 11.01, and the VMT of the Project vicinity (the TAZ) is 10.23 per worker. Therefore, impacts related to VMT would be less than significant; and the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

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. Vehicular access to the Project site would be provided via ingress and egress driveways connecting to Old 215 Frontage Road and an emergency access road off of Bay Avenue. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project area. The proposed Project would not introduce any new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area. The proposed Project includes internal driveways that would provide truck access to proposed buildings. Design of the proposed Project, including the internal private roadway, ingress, egress, and other streetscape changes are subject to the City's development standards. For example, the design of the Project circulation would be reviewed to ensure fire engine accessibility and turn around area is provided to the fire code standards. Similarly, truck traffic entering and exiting the facility will be compatible with newer light industrial developments in the immediate vicinity. As a result, impacts related to vehicular circulation design features would be less than significant.

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

Response:

Less than Significant.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and would not restrict access of emergency vehicles to the Project site or adjacent areas. The installation of driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed Project could require the temporary closure of one side or portions of Old 215 Frontage Road or Bay Avenue for a short period of time (i.e., hours or a few days). However, the construction activities would be required to ensure emergency access in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be ensured through the City's permitting process. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access impacts to a less than significant level.

Operation

As described previously, the proposed Project area would be accessed from one gated emergency access driveway on Bay Avenue and two driveways on Old 215 Frontage Road. The construction permitting process would provide adequate and safe circulation to, from, and through the Project area, and would provide routes for emergency responders to access different portions of the Project area. Because the Project is required to comply with all applicable City codes, as verified by the City, potential impacts related to inadequate emergency access would be less than significant.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

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
7. Traffic Impact Assessment, Translutions, August 2021, Appendix M.

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	☐	☒	☐	☐

Response:

Less than Significant with Mitigation. Assembly Bill (AB) 52 (Chapter 532, Statutes of 2014) establishes a formal consultation process for California tribes as part of the CEQA process and equates significant impacts on "tribal cultural resources" with significant environmental impacts (Public Resources Code [PRC] § 21084.2). AB 52 requires that lead agencies undertaking CEQA review evaluate, just as they do for other historical and archeological resources, a project's potential impact to a tribal cultural resource. As such, the City sent notices on January 22, 2021 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
- Cahuilla Band of Indians
- Desert Cahuilla Indians
- Los Coyotes Band of Cahuilla Mission Indians
- Morongo Band of Mission Indians

- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- Santa Rosa Band of Mission Indians
- Serrano Nation of Mission Indians
- Soboba Band of Luiseño Indians

The Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians requested consultation regarding the proposed Project. The consulting tribes consider the area sensitive for cultural resources as several sites are located nearby. Although no information for site specific tribal cultural resources was provided (and there are no known tribal cultural resources on or adjacent to the Project site), the consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented tribal cultural resources during construction. As such, MMs TCR-1 through TCR-8 are included, which require archaeological and Native American monitoring, preparation of a Cultural Resource Monitoring Plan, procedures for artifact disposition and inadvertent finds, and preparation of Phase III and IV reports. With implementation of MMs TCR-1 through TCR-8, impacts would be less than significant.

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. As discussed above, to avoid potential adverse effects to tribal cultural resources, MM CUL-1, above, and MM TCR-1 have been included to provide for Native American and archaeological monitoring of excavation and grading activities to avoid potential impacts to tribal cultural resources that may be unearthed by Project construction activities. No information has been provided to the Lead Agency indicating any likelihood of uncovering tribal cultural resources on the Project site, there are no known tribal cultural resources on or adjacent to the Project site, and no potentially significant impacts are anticipated. Mitigation measures MM CUL-1 and MM TCR-1 through TCR-8 are included in the event of any inadvertent discoveries during construction activities.

Additionally, as described previously, California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the Project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, with implementation of MM CUL-1 and MM TCR-1 through MM TCR-8, impacts to TCRs would be less than significant.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

MM TCR-1: Archaeological Monitoring. Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist, as discussed in MM CUL-1, to conduct monitoring of all mass grading and trenching activities. 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) including Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians, the contractor, and the City, shall develop a CRMP as defined in TCR-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.

MM TCR-2: Native American Monitoring. Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians for tribal monitoring. The City is also required to provide a minimum of 30 days' advance notice to the tribes of all mass grading and trenching 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 resources are unearthed. The Native American Monitor(s) shall attend the pre-grading meeting with the Project Archaeologist, 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.

MM 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 AB 52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 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.

MM TCR-4: Cultural Resource Disposition. In the event that Native American cultural resources are discovered during the course of grading and earth moving 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. Onsite 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 TCR-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.

MM TCR 5: The City shall verify that the following note is included on the Grading Plan:
"If any suspected archaeological 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."

MM TCR 6: Inadvertent Finds. If potential historic or cultural resources are uncovered during excavation or construction activities at the project site 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 archeologist 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 MM TCR-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.

MM 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).

MM CR 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).

MM TCR 9: Archeology Report - Phase III and IV. Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist 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 Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).

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.*)
6.

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 with Mitigation Incorporated

Water Infrastructure

The Project applicant would redevelop the Project site, which is currently served by Box Springs Mutual Water Company's (BSMWC) water infrastructure and would install new water infrastructure at the Project site that would either connect to a new lateral(s) to a newly installed, existing water line within Old 215 Frontage Road or the Project could be annexed into the Western Municipal Water District (WMWD) and could connect to a new, proposed 12-inch water line in Bay Avenue, which would connect to the existing water infrastructure in Old 215 Frontage Road. With either design option, the new onsite and offsite water system would convey water supplies to the proposed industrial building and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code for efficient use of water.

The proposed Project would receive water supplies through the proposed or existing water lines located within the Old 215 Frontage Road and Bay Avenue rights-of-way that would have the capacity to provide the increased water supplies needed to serve the proposed Project, which would be demonstrated to have capacity to serve the Project as required by Mitigation Measure UT-1. Installation of the new water distribution lines would only serve the proposed Project and would not provide new water supplies to any new off-site areas.

The construction activities related to the onsite and offsite water infrastructure that would be needed to serve the proposed Project is included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this IS/MND. For example, construction emissions from excavation and installation of the water infrastructure is included in Sections III, *Air Quality* and VIII, *Greenhouse Gas Emissions*. Therefore, with the implementation of Mitigation Measure UT-1, the proposed Project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Wastewater

The Project site is currently served by the existing sewer lines within Bay Avenue. The Project includes installation of onsite sewer lines that would connect to the existing sewer lines within Bay Avenue. The existing sewer lines would accommodate development of the Project site and would not require expansion to serve the proposed Project. The necessary onsite installation of wastewater infrastructure is included as part of the proposed Project and would not result in any physical environmental effects beyond those identified in other sections of this MND.

Storm Drainage

As discussed previously, the Project site is relatively flat, and runoff onsite would be conveyed into a biofiltration unit and eventually end up in the onsite modular wetland systems or underground storage basin.

Due to the appropriate sizing of the onsite drainage features, as ensured through the Project permitting process, operation of the proposed Project would not substantially increase stormwater runoff, and the Project would not require or result in the construction of new off-site storm water drainage facilities or expansion of existing offsite facilities, the construction of which could cause significant environmental effects. The required installation of the proposed drainage features is included as part of the proposed Project and would not result in any physical environmental effects beyond those identified in other sections of this IS/MND. Overall, impacts related to stormwater drainage facilities would be less than significant.

Electric Power

The Project would connect to the existing Southern California Edison electrical distribution facilities that are adjacent to the Project site and would not require the construction of new electrical facilities.

Natural Gas

The Project would connect to the existing Southern California Gas natural gas distribution facilities that are adjacent to the Project site.

The installation of the utilities at the locations as described above are evaluated throughout this IS/MND and found to 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?				

Response:

Less than Significant. Water service would be provided to the Project site by the BSMWC, which receives water through Western Municipal Water District (WMWD) or directly from WMWD. The 2015 WMWD UWMP, adopted in June 2021, was prepared for the WMWD and BWMWC and therefore accounts for the water usage that would be attributed to development of the Project site, consistent with its existing land use designation and zoning classification. According to the UWMP, the WMWD has four sources of water to provide to its service area: purchased/imported water, groundwater supplies, surface water, and recycled water (UWMP 2020).

The 2020 WMWD UWMP details that WMWD has adequate supplies to serve its customers during normal, dry year, and multiple dry year demand through 2065 with projected population increases and accompanying increases in water demand. Furthermore, WMWD forecasts for water demand are based on population projections of SCAG, which rely on adopted land use designations contained in general plans that cover the geographic area. Implementation of the Project would not change the land use designation or zoning of the Project site. The WMWD UWMP detailed a 2020 water demand of 352 gallons per capita per day. However, in order to conservatively estimate water used for domestic light industrial uses for the proposed Project a water demand rate of 2,000 gallons per day per acre was used.[1] Based on the construction of 196,759 SF of warehouse buildings, the Project would have a projected demand of 23,041 gallons per day of water or 25.8 acre feet per year, which is within the anticipated increased demand and supply for water, as shown on Table UT-1.

Table UT-1: WMWD UWMP Projected Water Demand (Acre Feet per Year)

Water Source	2025	2030	2035	2040	2045
BSMWC	145	150	175	175	175

Source: 2020 WMWD UWMP

Proposed building additions within the Project site would also be required to be compliant with CalGreen/Title 24 requirements for low flow plumbing fixtures and irrigation, which would provide for efficient water use. Therefore, the BWMWC and WMWD have sufficient water supplies available to serve the Project during normal, dry, and multiple dry years, and impacts 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. As discussed previously, wastewater from the Project site is collected by Edgemont Community Services District. Wastewater treatment services are provided by the City of Riverside per an agreement with Edgemont Community Services District. Based on a wastewater generation rate of 1,500 gal/acre/day for light industrial uses, the proposed Project would generate approximately 6,780 gallons per day or 7.59 acre feet per year.[2] The City of Riverside's wastewater treatment plant has a treatment capacity of 40 million gallons per day.

[1] Water demand of 2,000 gallons per day per acre was utilized from comparison to other industrial/warehouse uses in the Inland Empire in order to account for the increase water needs of light industrial facilities.

[2] Wastewater generation rate of 1,500 gallons per acre per day was utilized from the San Bernardino Countywide Plan EIR.

In 2019, the wastewater treatment plant received an average flow of approximately 26.4 million gallons per day. Therefore, the plant has an approximate additional capacity of 13.6 million gallons per day. This remaining capacity is adequate to serve the Project and the Project would not result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. As such, impacts 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. In 2019, the majority of the solid waste from the City, which was disposed of in landfills, went to the El Sobrante Landfill. The El Sobrante Landfill is permitted to accept 16,054 tons per day of solid waste and is permitted to operate through 2051. In June 2019, a maximum of 13,796 tons in a day was disposed at the El Sobrante Landfill, which provides for a remaining capacity of 2,258 tons per day.

Construction

Construction of the proposed Project would require demolition of the existing single-family residence, commercial tire shop, and associated structures. Demolition of the existing onsite buildings would result in a total of 1,862 tons of debris. However, Section 5.408.1 of the 2016 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the demolition and construction solid waste that would be disposed of at the landfill would be approximately 35 percent of the waste generated. Therefore, demolition activities, which would generate the most solid waste would generate approximately 651.7 tons of solid waste.

As described above, the El Sobrante Landfill has additional capacity of approximately 2,258 tons per day. Therefore, the facility would be able to accommodate the addition of 651.7 tons of waste during demolition of the proposed Project. Therefore, the El Sobrante Landfill would be able to accommodate solid waste from construction of the proposed Project.

Operation

The CalEEMod solid waste generation rate for general light industrial land use is 1.24 tons per year per 1,000 square feet. Thus, the proposed industrial warehouse buildings would generate approximately 244.2 tons of solid waste per year. However, at least 75 percent of the solid waste is required by AB 341 to be recycled, which would reduce the volume of landfilled solid waste to approximately 61 tons per year or 1.17 ton per week.

As the El Sobrante Landfill has additional capacity of approximately 2,258 tons per day, the facility would be able to accommodate the addition of 1.17 tons of waste per week from the Project. Therefore, the El Sobrante Landfill would be able to accommodate solid waste from operation of the proposed Project, and impacts related to landfill capacity would be less than significant.

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

Response:

Less than Significant. The proposed Project would result in new development that would generate an increased amount of solid waste. All solid waste-generating activities within the

City are subject to the requirements set forth in Section 5.408.1 of the 2016 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste.

In addition, as stated in Response IX(d) above, the proposed Project would be required to comply with the City's Municipal Code Chapter 8.80, Recycling and Diversion of Construction and Demolition Waste, which requires that developments must divert at least 50 percent of waste generated from demolition and construction and submit a waste management plan. In addition, the proposed Project would be required to comply with all federal, State, and local regulations related to solid waste. Furthermore, the proposed Project would comply with all standards related to solid waste diversion, reduction, and recycling during Project construction and operation. Therefore, the proposed Project is anticipated to result in less than significant impacts related to potential conflicts with federal, State, and local management and reduction statutes and regulations pertaining to solid waste.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

Mitigation Measure UT-1: Prior to the issuance of grading permits, the Project Applicant/Developer shall provide the City of Moreno Valley with documentation approved by one of the water purveyors serving the project area, either Box Springs Mutual Water Company or Western Municipal Water District, as well as approval from the Moreno Valley Fire Department, demonstrating that the water system is capable of delivering the required fire flow of 20 PSI, or whatever flow meets Fire Department standards at the time of construction, and multiple points of connection.

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
7. Western Municipal Water District, 2020 UWMP, https://www.wmwd.com/DocumentCenter/View/5433/Western-Final-Adopted-UWMP_20210630?bidId=
8. https://riversideca.gov/publicworks/sewer/master-plan/2019%20Sewer%20Master%20Plan%20Volume%201.pdf

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:

Less than Significant. According to the CAL FIRE Fire Hazard Severity Zone map, the Project site is not within an area identified as a Fire Hazard Area that may contain substantial fire risk or a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2021). The proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. As stated in Section IX of this IS/MND, the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Additionally, the proposed Project does not include any characteristics (e.g., permanent road closures or long-term blocking of road access) that would substantially impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Therefore, impacts related to emergency response and evacuation plans associated with construction of the proposed Project would be less than significant.

The proposed Project does not include any changes to public or private roadways that would physically impair or otherwise conflict with an emergency response plan or emergency evacuation plan. Further, the proposed Project would not obstruct or alter any transportation routes that could be used as evacuation routes during emergency events. In addition, during the operational phase of the proposed Project, on-site access would be required to comply with standards established by the City and Moreno Valley Fire Department. The size and location of fire suppression facilities (e.g., hydrants) and fire access routes would be required to conform to City and Fire Department's standards. The proposed Project would provide adequate emergency access to the site via driveways from Old 215 Frontage Road and Bay Avenue; the driveways would connect to an internal access way that would ensure access for emergency vehicles within the interior of the site. Further, access to and from the Project site for emergency vehicles would be reviewed and approved by the Moreno Valley Fire Department and the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable codes and ordinances for emergency vehicle access. Because the Project is required to comply with all applicable City codes, as verified by the City, any potential impacts related to an emergency response or evacuation plan (if any) would be less than significant.

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. As stated previously, the Project site is not located within a VHFHSZ. Additionally, the Project site and surrounding area are currently developed or are being developed, and therefore, lack extensive combustible materials and vegetation necessary for the uncontrolled spread of a wildfire.

The Project site is relatively flat and there are limited elevation changes in the Project vicinity. The Project proposes an industrial development in an area characterized by existing industrial, commercial, office, and older residential uses. As such, the Project itself would not exacerbate wildfire risks as compared to existing conditions because it is representative of existing development in the area. Thus, no impact related to other factors that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would occur from the Project.

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 does not require the installation or maintenance of associated infrastructure (including roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or that would result in impacts to the environment. Although the Project includes new driveways within the Project site, the Project does not include any changes to public or private roadways that would exacerbate fire risk or that would result in impacts to the environment. Although utility improvements, including domestic water, recycled water, sanitary sewer, and storm drain lines proposed as part of the Project would be extended throughout the Project site, these utility improvements would be underground and would not exacerbate fire risk. Project design and implementation of utility improvements would be reviewed and approved by the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable design standards and regulations. Therefore, the proposed Project would not include infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities), that would exacerbate fire risk or that would result in impacts to the environment.

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:

Less than Significant. As discussed in Section X of the IS/MND, the Project site is located in Zone X and is not in a flood hazard area. During Project construction soil would be compacted and drainage patterns would be temporarily altered due to grading, and there would be an increased potential for flooding compared to existing conditions. However, construction BMPs would be identified and implemented as part of the proposed Project. Implementation of construction BMPs would control and direct surface runoff to prevent flooding, and as such, Project construction would not expose people or structures to significant risks related to downslope and downstream flooding. Therefore, impacts would be less than significant.

During operation, the proposed Project would not substantially alter the existing on-site drainage patterns. Compliance with the proposed operational BMPs would ensure on-site storm drain facilities would be sized to accommodate stormwater runoff from the Project site so that onsite flooding would not occur. Therefore, impacts would be less than significant.

As established in Section VII of this IS/MND, there are no landslide zones close to or within the boundaries of the Project site. The Project site is relatively flat; therefore, the risk of slope failure represents a limited level of concern on the Project site. Further, projects in the City of Moreno Valley are required to comply with the CBC, which would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. These features would reduce potential impacts related to landslides to a less than significant level. Therefore, with implementation of the CBC, the Project would not expose people or structures to significant risks, including downslope or downstream landslides, and impacts (if any) would be less than significant.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None.

Sources:

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.

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 with Mitigation Incorporated. As discussed in Section IV of this IS/MND, the Project site is not populated or used by any species identified as a candidate, sensitive, or special status, and does not contain habitat that would support sensitive species. Furthermore, the Biological Resources Assessment determined that the proposed Project would be consistent with the provisions of the MSHCP through payment of fees and conduct of preconstruction surveys for burrowing owl. The proposed Project would implement MM BIO-1 and MM BIO-2 requiring preconstruction burrowing owl and nesting bird surveys. Therefore, impacts related to biological resources would be less than significant with incorporation of mitigation measures.

As discussed in Section V, *Cultural Resources*, there are no historic resources located within the Project site. In addition, surveys revealed that the potential for encountering archaeological and paleontological resources on the site is high. However, with incorporation of MM CUL-1, MM PAL-1, and MM TCR-1, impacts to cultural and paleontological resources and TCRs would be less than significant.

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.)?	☐	☒	☐	☐

Response:

Less than Significant with Mitigation Incorporated. The proposed Project would demolish the existing single-family residence and commercial tire shop and develop the site with six industrial warehouse buildings that total 196,759 SF. As presented in this IS/MND, potential Project-related impacts are either less than significant or would be less than significant with mitigation incorporated. Based on the analysis contained in this IS/MND, Project-related impacts would be reduced to less than significant levels with the incorporation of mitigation measures. Given that the potential Project-related impacts would be mitigated to a less than significant level, implementation of the proposed Project would not result in impacts that are cumulatively considerable when evaluated with the impacts of other current projects, or the effects of probable future projects. Therefore, the proposed Project's contribution to any significant cumulative impacts would be less than cumulatively considerable. As discussed in Sections I through XX of this IS/MND, mitigation would be required and incorporated as necessary. Therefore, impacts would be less than significant with mitigation incorporated.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Response:

Less than Significant with Mitigation Incorporated. Based on the Project Description and the preceding responses in Sections I through XX of this IS/MND, implementation of the proposed Project would not cause substantial adverse effects to human beings because all potentially significant impacts of the proposed Project would be mitigated to a less than significant level. Therefore, since all potentially significant impacts of the proposed Project are expected to be mitigated to a less than significant level, implementation of the proposed Project would not cause substantial adverse effects on human beings.

Existing Plans, Programs, or Policies (PPPs)

None.

Mitigation Measures

None specific to Mandatory Findings of Significance, but mitigation measures to the other individual environmental factors relate to the findings contained herein.

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