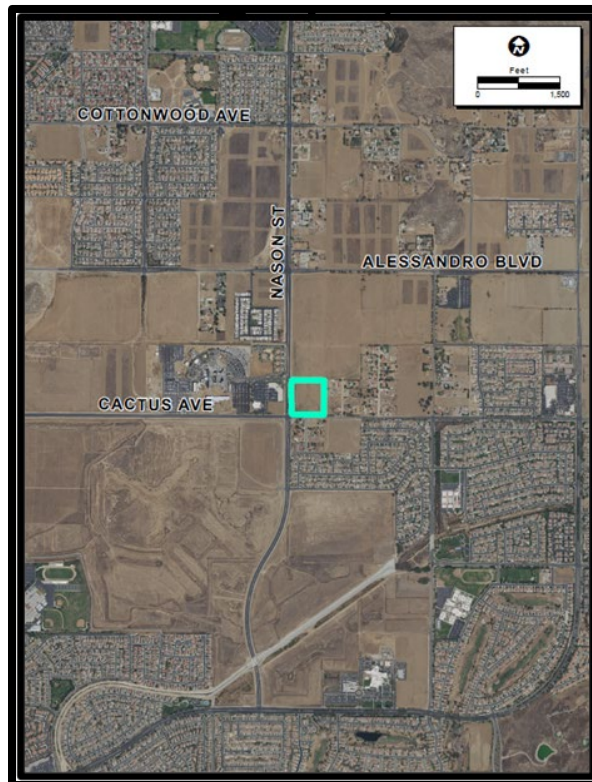




# CITY OF MORENO VALLEY

## Mitigated Negative Declaration for the Cactus Avenue and Nason Street Commercial Office and Retail Development



**Cactus Avenue and Nason Street Commercial  
Office and Retail Development Project  
PEN20-0115**

**May 2023**

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

**Prepared By**  
**ECORP Consulting, Inc.**  
215 North 5<sup>th</sup> Street  
Redlands, CA 92374  
(909) 307-0046

# TABLE OF CONTENTS

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:.....	1
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: .....	6
DETERMINATION (To be completed by the Lead Agency):.....	6
EVALUATION OF ENVIRONMENTAL IMPACTS:.....	7
ISSUES & SUPPORTING INFORMATION SOURCES: .....	9
I.    AESTHETICS .....	9
II.   AGRICULTURE AND FOREST RESOURCES .....	10
III.  AIR QUALITY .....	12
IV.  BIOLOGICAL RESOURCES .....	26
V.   CULTURAL RESOURCES .....	31
VI.  ENERGY .....	32
VII.  GEOLOGY AND SOILS.....	36
VIII. GREENHOUSE GAS EMISSIONS.....	39
IX.  HAZARDS AND HAZARDOUS MATERIALS .....	42
X.   HYDROLOGY AND WATER QUALITY – Would the project: .....	45
XI.  LAND USE AND PLANNING .....	47
XII. MINERAL RESOURCES – Would the project: .....	47
XIII. NOISE .....	48
XIV. POPULATION AND HOUSING .....	57
XV.  PUBLIC SERVICES .....	57
XVI. RECREATION .....	59
XVII. TRANSPORTATION.....	59
XVIII. TRIBAL CULTURAL RESOURCES .....	66
XIX. UTILITIES AND SERVICE SYSTEMS.....	70
XX.  WILDFIRE .....	72
XXI. MANDATORY FINDINGS OF SIGNIFICANCE .....	73
MITIGATION MONITORING REPORTING PROGRAM: .....	75
ATTACHMENT A – FIGURES	
Figure 1 .....	Project Vicinity
Figure 2 .....	Project Location
Figure 3 .....	Project Site Plan

APPENDICES (Separate Documents)

- A – Air Quality/Greenhouse Gas Assessment and Energy Consumption Modeling Results
- B – Biological Technical Report and 2023 Update
- C – Cultural Resources Inventory Report 2023 Update
- D – Noise Impact Analysis
- E – Phase I Environmental Site Assessment
- F – 2020 Traffic Impact Assessment, 2023 Update and 2023 VMT Memo



# CITY OF MORENO VALLEY

---

## **MITIGATED NEGATIVE DECLARATION FOR Cactus Avenue and Nason Street Commercial Office and Retail Development Project**

**(PEN21-0288-0289, PEN20-0115, PEN20-0110-0112, PEN23-0081-0083)**

**May 2023**

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

**Prepared By  
ECORP Consulting, Inc.  
215 North 5<sup>th</sup> Street  
Redlands, CA 92374  
(909) 307-0046**



# MITIGATED NEGATIVE DECLARATION

## Cactus Avenue and Nason Street Commercial Office and Retail Development Project

---

### **Project Description:**

The Cactus Avenue and Nason Street Commercial Office and Retail Development Project (Proposed Project) would construct an 89,805 square foot (sf) commercial/retail development on an approximately 8.4 acre/362,400 sf unimproved vacant lot. The Proposed Project would construct a total of seven buildings consisting of three mixed use medical/office buildings commercial/office buildings, two drive-thru food service buildings, one retail/restaurant building, and one convenience store building with fuel service. Each building will include associated parking.

- 3,500 sq. ft food drive-thru building with 25 parking stalls (Pad A)
- 2,310 sq. ft food drive-thru building with 23 parking stalls (Pad C)
- 8,000 sq. ft total [4,5000 retail and 3,500 restaurant] retail/restaurant building with 52 parking stalls (Pad B)
- 3,995 sq. ft convenience store with fuel service with 18 parking stalls
- Two 16,000 sq. ft 2-story medical office building with 144 shared parking stalls
- One 40,000 sq. ft 3-story mixed office building with 170 parking stalls
- Three water retention areas
  - Two located between office buildings 1 and 2 and
  - One located between office building 3 and Cactus Avenue
- 22 short-term bicycle parking stalls
- 22 long-term bicycle parking stalls
- Four entry/exit driveways
  - Two would be along Cactus Avenue, one on Nason Street, and one along the private street at the northern boundary of the Project Site
- Cactus Avenue would be widened to its ultimate width along the Project boundary.

Construction of the Proposed Project is anticipated to occur in three phases and take approximately 18 months. Construction staging areas would be located within the Project Site.

### **Project Location: (include map)**

The Project Site is located on an undeveloped lot at northeast corner of Cactus Avenue and Nason Street (APN 486-290-038) in the City of Moreno Valley in northwest Riverside County. The Project Site is located just east of the Riverside University Health System Regional Medical Center, approximately two miles south of State Route 60 (SR-60) and five miles east of Interstate 215 (I-215).



# MITIGATED NEGATIVE DECLARATION

## Cactus Avenue and Nason Street Commercial Office and Retail Development Project

**Project Proponent:**

MV Cactus 9, LLC  
 22647 Ventura Boulevard #576  
 Woodland Hills, CA 91364

**Findings:**

It is hereby determined that, based on the information contained in the attached Initial Study, the project would not have a significant adverse effect on the environment.

**Mitigation Measures:**

No.	Mitigation Measure
<b>BIO-1</b>	Pre-construction Survey for Nesting Birds: Any ground disturbance activities shall be conducted during the non-breeding season for birds (approximately September 1 through January 31). This will avoid violations of the MBTA and California Fish and Game Code §§ 3503, 3503.5 and 3513. If activities with the potential to disrupt nesting birds are scheduled to occur during the bird breeding season (February 1 through August 31), a preconstruction nesting bird survey shall be conducted no more than three days prior to ground-disturbing activities by a qualified biologist who is experienced in the identification of avian species and conducting nesting bird surveys. The nest surveys shall include the Project Site and adjacent areas where Project activities have the potential to cause nest failure. If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors) are found to be present, avoidance or minimization measures shall be undertaken to avoid potential project related impacts. Measures may include establishment of an avoidance buffer until nesting has been completed and periodic nest monitoring by the Project biologist. The width of the avoidance buffer will be determined by the Project biologist. Typically, this is 300 feet from the nest site in all directions (500 feet is typically recommended by CDFW for raptors), until the juveniles have fledged and there has been no evidence of a second attempt at nesting. The monitoring biologist will monitor the nest(s) during construction and document any findings.
<b>BIO-2</b>	Presence/Absence Surveys for Crotch Bumble Bee: To avoid adverse effects to Crotch bumble bee that may be present within the Project Site, a qualified biologist knowledgeable of Crotch bumble bee species ecology will conduct a survey of areas that may provide habitat for this species. The qualified biologist shall contact CDFW to request the agency



# MITIGATED NEGATIVE DECLARATION

## Cactus Avenue and Nason Street Commercial Office and Retail Development Project

	<p>approved survey protocol for Crotch bumble bee and shall follow the agency-accepted protocol when conducting the surveys. The survey will be conducted within one year prior to vegetation removal and/or grading. Surveys should be conducted during the flying season when the species is most likely to be detected above ground, between March 1 and September 1 (Thorp et al 1983). Within 30 days of completing the survey, the qualified biologist shall prepare a Crotch Bumble Bee Survey Report and submit it to the Project proponent. The report shall include, at minimum, a description of the methods to conduct the surveys, a description of suitable habitat areas, and a map of the locations where Crotch bumble bee and any other special-status species were observed. The qualified biologist shall submit CNDDDB forms for any Crotch bumble bees or other special-status species observed during the surveys. The survey report shall also include measures sufficient to avoid “take” or other adverse impacts to Crotch bumble bee, if found during the surveys.</p> <p>If surveys confirm the presence of Crotch bumble bee, and if adverse impacts or “take” of the species cannot be avoided, then the Project proponent will need to obtain an Incidental Take Permit from CDFW. The ITP application shall be submitted to CDFW approximately one year prior to the take or adverse impacts to the species to allow time for the processing of the application and the issuance of the ITP. Adverse impacts or take of this species shall not occur until CDFW has issued the ITP.</p>
<p><b>BIO-3</b></p>	<p>Pre-Construction Surveys for Burrowing Owl: Pre-construction surveys for burrowing owl shall be conducted within the Project Site and adjacent areas prior to the start of ground disturbing activities. The surveys shall follow the methods described in the Western Riverside MSHCP Burrowing Owl Survey Instructions (RCTLMA 2006). According to Western Riverside MSHCP’s Burrowing Owl Survey Instructions, focused burrowing owl surveys shall be conducted because suitable habitat was recorded during the burrowing owl habitat assessment. If burrowing owls and/or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified on the Project Site during the survey and impacts to the species are unavoidable, additional mitigation may need to be implemented, such as implementing a no-disturbance buffer around occupied burrows or seasonal work restrictions. In addition to the focused burrowing owl surveys, preconstruction surveys shall take place within 30-days prior to ground disturbance in accordance with the Western Riverside MSHCP Burrowing Owl Survey Instructions (RCTLMA</p>



# MITIGATED NEGATIVE DECLARATION

## Cactus Avenue and Nason Street Commercial Office and Retail Development Project

	2006) and the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012).
<b>BIO-4</b>	Stephens' Kangaroo Rat Mitigation Fee: In accordance with Moreno Valley Municipal Code 8.60 and to offset impacts to the Stephens' kangaroo rat, all applicants for development permits within the Stephens' kangaroo rat fee assessment area must pay an impact and mitigation fee of five hundred dollars (\$500.00) per gross acre located within the parcel to be developed an any offsite areas that are disturbed resulting from related Project activities. Further coordination with the RCA regarding the mitigation fee may be required.
<b>CR-1</b>	Archaeological Monitoring. Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground disturbing activities. 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 The Pechanga Band of Indians, the contractor, and the City, shall develop a CRMP as defined in CR-3. The Project archeologist shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed.
<b>CR-2</b>	Native American Monitoring. Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Indians for tribal monitoring. The Developer is also required to provide a minimum of 30 days' advance notice to the tribes of all ground disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological 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.
<b>CR-3</b>	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



# MITIGATED NEGATIVE DECLARATION

## Cactus Avenue and Nason Street Commercial Office and Retail Development Project

	<p>defined as a Tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB 52 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 AB 52. Details in the Plan shall include:</p> <ol style="list-style-type: none"> <li>a. Project description and location</li> <li>b. Project grading and development scheduling</li> <li>c. Roles and responsibilities of individuals on the Project</li> <li>d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details</li> <li>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;</li> <li>f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items;</li> <li>g. Contact information of relevant individuals for the Project</li> </ol>
<p><b>CR-4</b></p>	<p>Cultural Resource Disposition. In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>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: <ol style="list-style-type: none"> <li>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.</li> <li>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 CR-3 The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the</li> </ol> </li> </ol>



# MITIGATED NEGATIVE DECLARATION

## Cactus Avenue and Nason Street Commercial Office and Retail Development Project

	<p style="text-align: center;">Consulting Native American Tribal Governments prior to certification of the environmental document.</p> <p>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."</p>
<b>CR-5</b>	<p>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 CR-2 before any further work commences in the affected area. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p>
<b>CR-6</b>	<p>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</p>



# MITIGATED NEGATIVE DECLARATION

## Cactus Avenue and Nason Street Commercial Office and Retail Development Project

	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).
<b>CR-7</b>	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).
<b>CR-8</b>	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).
<b>GEO-1:</b>	The developer shall ensure that any excavations below 4 feet in depth are closely monitored by a qualified paleontological monitor. Any specimens shall be collected by the monitor. Sediment samples shall be collected and processed to determine the small fossil potential in the Project Area. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution.
<b>NOI-1:</b>	The Project improvement and building plans will include the following requirements for construction activities along the south side of Cactus Avenue adjacent to the residential uses:

## MITIGATED NEGATIVE DECLARATION

### Cactus Avenue and Nason Street Commercial Office and Retail Development Project

- Construction contracts must specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices.
- A sign, legible at a distance of 50 feet, shall be posted at the offsite Project construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator.
- As applicable, all equipment shall be shut off when not in use.
- Equipment staging shall be located in areas that create the greatest distance between construction-related noise/vibration sources and sensitive receptors surrounding offsite construction.
- During offsite construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receptors nearest the Project Site.
- Jackhammers, pneumatic equipment, and all other portable stationary noise sources will be directed away from residential receptors. Either one-inch plywood or sound blankets can be utilized for this purpose. They should reach up from the ground and block the line of sight between equipment and the nearest off-site residences. The shielding should be without holes and cracks.



# MITIGATED NEGATIVE DECLARATION

## Cactus Avenue and Nason Street Commercial Office and Retail Development Project

	<ul style="list-style-type: none"> <li>Per Chapter 11.80 of the City of Moreno Valley Municipal Code, construction is prohibited between the hours of 8:00 p.m. and 7:00 a.m.</li> </ul>
<b>TRANS-1:</b>	<p>The following improvements shall be provided by the developer:</p> <ul style="list-style-type: none"> <li>Intersection #7: Modify striping of southbound Nason Street at Iris Avenue to provide two exclusive right-turn lanes, one through lane, and one exclusive left-turn lane</li> </ul>
<b>TRANS-2:</b>	<p>The following improvements shall be provided by the developer:</p> <ul style="list-style-type: none"> <li>Extend westbound left-turn lane on Cactus Avenue at Nason Street to provide 300 feet of storage length.</li> <li>Extend northbound left-turn lane on Nason Street at Cactus Avenue to provide 300 feet of storage length.</li> </ul>
<b>TRANS-3:</b>	<p>Encourage Telecommuting and Alternative Work Schedules: For applicable uses, the site CC&amp;Rs shall include a section that will encourage employers to promote telecommuting or alternative/flexible work schedules.</p>

**Attachments:**

1. Location Map
2. Initial Study and Mitigation Monitoring and Reporting Program



# INITIAL STUDY (IS) FOR Cactus Avenue and Nason Street Commercial Office and Retail Development Project

---

## BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

- **Project Case Number(s):** PEN20-0115, PEN21-0288-0289, PEN20-0110-0112, PEN23-0081-0083
- **Project Title:** Cactus Avenue and Nason Street Commercial Office and Retail Development Project
- **Public Comment Period:** June 14, 2023 through July 5, 2023
- **Lead Agency:** City of Moreno Valley  
Julia Descoteaux, Planning Department  
planningnotices@moval.org  
14177 Frederick Street  
Moreno Valley, CA 92552  
Phone: (951) 413-3206
- 5. **Documents Posted At:** <http://www.moreno-valley.ca.us/cdd/documents/about-projects.html>
- 6. **Prepared By:** Anne Surdzial, AICP  
ECORP Consulting, Inc.  
215 North 5<sup>th</sup> Street  
Redlands, CA 92374  
Phone: (909) 307-0046  
E-mail: asurdzial@ecorpc consulting.com
- 7. **Project Sponsor:**  
**Applicant/Developer**  
MV Cactus 9, LLC  
22647 Ventura Boulevard #576  
Woodland Hills, CA 91364
- 8. **Project Location:** The Proposed Project is located within the City of Moreno Valley (Assessors Parcel Number [APN] 486-290-038) in northwest Riverside County. The Project Site is located at northeast corner of Cactus Avenue and Nason Street, just east of the Riverside University Health System Medical Center, approximately two miles south of State Route 60 (SR-60) and five miles east of Interstate 215 (I-215).
- 9. **General Plan Designation:** Downtown Center (DC). Permitted uses for the designation include office, retail, restaurant, and commercial uses.
- 10. **Specific Plan Name and Designation:** Not Applicable

11. **Existing Zoning:** The Project Site is zoned Downtown Center (DC). The primary purpose of the Downtown Center (DC) district is to provide for a dynamic local economy and vibrant gathering places. This district is intended as an area for the development of pedestrian-friendly commercial and high-density residential uses.

The Proposed Project would be consistent with the current General Plan land use and zoning designation.

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

Table 1. Surrounding Land Uses

	Land Use	General Plan	Zoning
Project Site	Vacant Undeveloped	Downtown Center (DC)	Downtown Center (DC)
North	Vacant Undeveloped	Downtown Center (DC)	Downtown Center (DC)
South	Residential	Residential: Max. 2 du/ac (R2)	Residential Agriculture 2 DU/AC (RA2)
East	Residential	Residential: Max. 2 du/ac (R2)	Residential Agriculture 2 DU/AC (RA2)
West	Medical Offices and Riverside University Health System Medical Center	Downtown Center (DC)	Downtown Center (DC)

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

**Environmental Setting**

The Project Site is located on an undeveloped lot at northeast corner of Cactus Avenue and Nason Street (APN 486-290-038) in the City of Moreno Valley in northwest Riverside County. The Project Site is located just east of the Riverside University Health System Regional Medical Center, approximately two miles south of State Route 60 (SR-60) and five miles east of Interstate 215 (I-215). Surrounding land uses include vacant undeveloped land to the north, residential development to the south and east, and medical offices and the Riverside University Health System Regional Medical Center to the west.

**Project Description**

The Cactus Avenue and Nason Street Commercial Office and Retail Development Project (Proposed Project) would construct an 89,805 square foot (sf) commercial/retail development in the City of Moreno Valley, Riverside County (Proposed Project). The Project Site is located at the northeast corner of Cactus Avenue and Nason Street intersection, on an approximately 8.4 acre/362,400 sf unimproved vacant lot. The Proposed Project would construct a total of seven buildings consisting of three mixed use medical/ office buildings commercial/office buildings, two drive-thru food service buildings, one retail/ restaurant building, and one convenience store building with fuel service. Each building will include associated parking. A breakdown of building type, square footage, and parking provided is shown in Table 2 below.

**Table 2. Project Summary**

	<b>Building Type</b>	<b>Size (square feet)</b>	<b>Parking Provided (stalls)</b>
<b>Pad</b>			
A-	Food Drive-Thru	3,500	35
B-	Retail/ Restaurant	8,000 [4,500 Retail & 3,500 Rest.]	52
C-	Food Drive-Thru	2,310	23
	Convenience Store w/ Fuel Service	3,995	18
<b>Commercial/Office Building</b>			
	Medical Office Building #1 (2-story)	16,000	144
	Medical Office Building #2 (2-story)	16,000	
	Mixed Office Building #3 (3-story)	40,000 [20,000 Med. & 20,000 Office]	170
<b>Total</b>		<b>89,805</b>	<b>442</b>

Notes: No compact stalls allowed.

The Project will also provide 22 short-term and 22 long-term bicycle parking stalls. The Proposed Project would include four entry/exit driveways; two would be along Cactus Avenue, one on Nason Street, and one along the private street at the northern boundary of the Project Site. Cactus Avenue would also be widened to its ultimate width along the project boundary. The Proposed Project would also include three water retention areas, two located between office buildings 1 and 2, and one located between office building 3 and Cactus Avenue.

Construction of the Proposed Project is anticipated to occur in three phases and take approximately 18 months. Construction staging areas would be located within the Project Site.

**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.

Two California Native American Tribes, the Pechanga Band of Indians and the Agua Caliente Band of Cahuilla Indians requested consultation pursuant to Public Resource Code section 21080.3.1. Consultation with both Tribes has concluded. A summary of tribal consultation is included as part of Chapter XVIII. *TRIBAL CULTURAL RESOURCES* of this Initial Study.



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

a. None / Not Applicable

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

- a. Air Quality and Greenhouse Gas Assessment
- b. Biological Technical Report and 2023 Update
- c. Cultural Resources Inventory Report 2023 Update
- d. Noise Impact Analysis
- e. Phase I Environmental Site Assessment
- f. Traffic Impact Assessment and 2023 Update

**17. Acronyms:**

AB -	Assembly Bill
AQMP -	Air Quality Management Plan
ALUCP -	Airport Land Use Compatibility Plan
APN -	Assessors Parcel Number
BMP -	Best Management Practices
CAA -	Clean Air Act
CAAQS -	California Ambient Air Quality Standards
CAPCOA -	California Air Pollution Control Officers Association
CARB -	California Air Resources Board
CBC -	California Building Council
CCAA -	California Clean Air Act
CDC -	California Department of Conservation
CDFW -	California Department of Fish and Wildlife
CEQA -	California Environmental Quality Act
CNEL -	Community Noise Equivalent Level
CNPS -	California Native Plant Society
CO -	Carbon Monoxide
CRHR -	California Register of Historic Places
CUPA -	Certified United Programs Agency
DPM -	Diesel Particulate Matter
EIC -	Eastern Information Center
EIR -	Environmental Impact Report
EMWD -	Eastern Municipal Water District
EPA -	Environmental Protection Agency
FEMA -	Federal Emergency Management Agency
FTA -	Federal Transit Administration
GHG -	Greenhouse Gas
IS -	Initial Study
LOS -	Level of Service
LUST -	Leaking Underground Storage Tank
MARB -	March Airforce Reserve Base
MBTA -	Migratory Bird Treaty Act
MIP -	March Inland Port
MSHCP -	Multiple Species Habitat Conservation Plan
MVFD -	Moreno Valley Fire Department
MVPD -	Moreno Valley Police Department
MVUSD -	Moreno Valley Unified School District

NAAQS -	National Ambient Air Quality Standards
NEPSSA -	National Endemic Plant Species Survey Area
NO <sub>2</sub> -	Nitrogen Dioxide
NPDES -	National Pollutant Discharge Elimination System
NRHP -	National Register of Historic Places
PM -	Particulate Matter
PPV -	Peak Particle Velocity
RCA -	Regional Conservation Authority
ROG -	Reactive Organic Gases
RTP/SCS -	Regional Transportation Plan/Sustainable Communities Strategy
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
sf -	Square Foot
SIP -	State Implementation Plan
SoCAB -	South Coast Air Basin
SR -	State Route
SRA -	Sensitive Receptor Area
SWPPP -	Storm Water Pollution Prevention Plan
SWRCB -	State Water Resources Control Board
TAC -	Toxic Air Contaminants
TAZ	Traffic Analysis Zone
UBC -	Uniform Building Council
UWMP -	Urban Water Management Plan
VHFHSZ -	Very High Fire Hazard Severity Zone
VMT -	Vehicle Miles Traveled
VVUSD -	Valley Verde Unified School District
WQMP -	Water Quality Management Plan

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

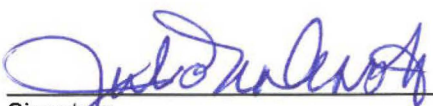
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |                          |                             |                          |                                  |                          |                                    |
|--------------------------|-----------------------------|--------------------------|----------------------------------|--------------------------|------------------------------------|
| <input type="checkbox"/> | Aesthetics                  | <input type="checkbox"/> | Agriculture & Forestry Resources | <input type="checkbox"/> | Air Quality                        |
| <input type="checkbox"/> | Biological Resources        | <input type="checkbox"/> | Cultural Resources               | <input type="checkbox"/> | Energy                             |
| <input type="checkbox"/> | Geology & Soils             | <input type="checkbox"/> | Greenhouse Gas Emissions         | <input type="checkbox"/> | Hazards & Hazardous Materials      |
| <input type="checkbox"/> | Hydrology & Water Quality   | <input type="checkbox"/> | Land Use & Planning              | <input type="checkbox"/> | Mineral Resources                  |
| <input type="checkbox"/> | Noise                       | <input type="checkbox"/> | Population & Housing             | <input type="checkbox"/> | Public Services                    |
| <input type="checkbox"/> | Recreation                  | <input type="checkbox"/> | Transportation                   | <input type="checkbox"/> | Tribal Cultural Resources          |
| <input type="checkbox"/> | Utilities & Service Systems | <input type="checkbox"/> | Wildfire                         | <input type="checkbox"/> | 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.

  
 \_\_\_\_\_  
 Signature  
 Julia Descoteaux  
 \_\_\_\_\_  
 Printed Name

6/14/2023  
 \_\_\_\_\_  
 Date  
 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
<b>I. AESTHETICS</b> – Except as provided in <a href="#">Public Resources Code §21099</a> – Modernization of Transportation Analysis for Transit-Oriented Infill Projects – <b>Would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> According to the Moreno Valley General Plan, scenic resources contribute to the overall desirability of a community. The distinctive physical setting of Moreno Valley creates much of the City's appeal as a place in which to live and do business. Thus, Moreno Valley's visual resources are also of economic value to the community. The most prominent scenic resources within the City are visible from State Route (SR) 60, the major transportation route in the area. As the City develops, the manmade environment becomes equally important in terms of scenic values because buildings, landscaping and signs often dominate the view.</p> <p>The Project Site is currently vacant and undeveloped. The vicinity surrounding the Project Site is dominated by urban and suburban development and disturbances. Implementation of the Proposed Project would change views of the site from vacant undeveloped land to developed commercial/retail; however, the Proposed Project features would blend with the existing setting and are not anticipated to adversely alter the existing viewshed of any scenic vistas, including the distant San Bernardino Mountains, San Gabriel Mountains, and Box Springs Mountain. The closest designated scenic highway to the Project Site is SR-74, located approximately nine miles south of the Project Site. Implementation of the Proposed Project would not affect scenic vistas or scenic resources within the vicinity of a designated scenic highway. Impacts would be less than significant.</p>				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b> The California Scenic Highway Program protects and enhances the scenic beauty of California's highways and adjacent corridors. A highway can be designated as scenic based on how much natural beauty can be seen by users of the highway, the quality of the scenic landscape, and if development impacts the enjoyment of the view. According to Caltrans, the nearest State Scenic Highway to the Project Site is the SR-74 which runs through the City of Perris, located approximately nine miles south of the Project Site. Additionally, there are no scenic resources including trees, rock outcroppings, or historic buildings on the Project Site. As such, no impact to scenic resources would occur.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Proposed Project would develop a vacant lot to a Commercial Office and Retail center changing the visual quality and character of the site. The Proposed Project would feature food stalls, restaurant space, retail space, commercial office buildings, lighting, and landscaping on an 8.4-acre lot. Although the views of the Project Site would change from vacant land to developed commercial office and retail, the Proposed Project features would blend with the existing setting and are not anticipated to adversely alter the existing viewshed of any scenic vistas. The Proposed Project would conform to applicable City Municipal Code design guidelines and development standards for commercial/retail development. As such, impacts would be less than significant.</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Proposed Project would include light fixtures for parking lots, pedestrian pathways, building entries, and landscaping. Light sources within the Project Site would likely include building-mounted, wall-mounted, and pole-mounted light fixtures; and illuminated signs. These light fixtures would provide increased visibility and security to the Project Site.</p> <p>Although new sources of light and glare would be included with the Proposed Project, they would not be substantial and would not adversely affect day or nighttime views in the area. The Proposed Project would comply with City regulations and design standards, including the use of shielding around light fixtures at the edge of the Project Site to minimize spillover effects on surrounding properties. Compliance with City standards would ensure that impacts from light sources and glare would be less than significant.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Moreno Valley 2040 General Plan, adopted June 15, 2021 <ul style="list-style-type: none"> <li>• Chapter 2 – Land Use &amp; Community Character Element</li> <li>• Chapter 10 – Open Space &amp; Resource Conservation <ul style="list-style-type: none"> <li>- Map OSRC-3: Scenic Resources and Ridgelines</li> </ul> </li> </ul> </li> <li>2. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code <ul style="list-style-type: none"> <li>• Section 9.10.110 – Light and Glare of the Moreno Valley Municipal Code.</li> <li>• Chapter 9.16 – Design Guidelines</li> <li>• Section 9.17.030 G – Heritage Trees</li> </ul> </li> <li>3. California Department of Transportation <ul style="list-style-type: none"> <li>• List of eligible and officially designated State Scenic Highways. Available at: <a href="https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways">https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways</a>. Accessed on January 04, 2023.</li> </ul> </li> </ol>				
<p><b>II. AGRICULTURE AND FOREST RESOURCES</b> – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board.</p> <p><b>Would the project:</b></p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> According to the California Department of Conservation (CDC), the soils on most of the Project Site are classified as Farmland of Local Importance. This type of farmland is defined as “soils that would be classified as prime and statewide but lack available irrigation water”. There are no portions of the Project Site or surrounding area that are classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project Site is not zoned for agricultural uses and the Project Site is not currently used for agriculture. Therefore the Proposed Project would not result in conversion of Farmland to non-agricultural use. The Proposed Project does not have the potential to directly or indirectly convert Farmland to non-agricultural use, and a less than significant impact would occur.</p>				



<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  The Project Site is currently designated as Downtown Center (DC). The Project Site and adjacent properties do not support agricultural land uses under the Project's baseline condition. Additionally, according to the City of Moreno Valley General Plan Environmental Impact Report (EIR), there are no lands under Williamson Act contract in the City of Moreno Valley (Moreno Valley 2021). Therefore, implementation of the Proposed Project would not conflict with existing zoning for agricultural use or with an existing Williamson Act contract. No impact would occur.</p>				
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in <a href="#">Public Resources Code section 12220(g)</a> ), timberland (as defined by <a href="#">Public Resources Code section 4526</a> ), or timberland zoned Timberland Production (as defined by <a href="#">Government Code section 51104(g)</a> )?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  The Project Site and surrounding areas are zoned for Residential Agriculture and Downtown Center. The Proposed Project would be consistent with the current General Plan land use and zoning designation. As such, the Proposed Project would not have the potential to conflict with existing zoning for, or cause rezoning of, timberland or timberland zoned Timberland Production because the Project Site is not located within an area zoned for timberland or timberland production. No impact would occur.</p>				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  The Project Site and surrounding areas are not located within a forest. The Project Site is located in a portion of the City of Moreno Valley that is developed and developing. Accordingly, the Proposed Project would not have the potential to result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  The Proposed Project consists of the development of one parcel, APN 486-290-038, consistent with the current General Plan land use and zoning designation Downtown Center (DC), which is a mixed use designation that includes, commercial, office, and other vertical and horizontal mixed uses. The site is not currently used for agriculture; therefore, the Proposed Project would not result in conversion of Farmland to non-agricultural use. Additionally, there are no forest lands in the project vicinity, and conversion of forest land to non-forest use would not occur. As such, the impact would be less than significant.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Moreno Valley 2040 General Plan, adopted June 15, 2021 <ul style="list-style-type: none"> <li>• Chapter 2 – Land Use &amp; Community Character Element</li> <li>• Chapter 10 – Open Space &amp; Resource Conservation Element</li> </ul> </li> <li>2. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code</li> <li>3. California Department of Conservation <ul style="list-style-type: none"> <li>• Riverside County Important Farmland 2016 Sheet 1 of 3 Map. Published 2017. Available at <a href="https://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx">https://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx</a>. Accessed on July 18, 2019.</li> </ul> </li> </ol>				



ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> – 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. <b>Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  An air quality and greenhouse gas emissions report was prepared for the Proposed Project (ECORP 2023a, Appendix A), and is summarized in this Initial Study.</p> <p>As part of its enforcement responsibilities, the United State Environmental Protection Agency (EPA) requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.</p> <p>The Project Site is located within the South Coast Air Basin (SoCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the SoCAB is in nonattainment. In order to reduce such emissions, the SCAQMD prepared the 2016 Air Quality Management Plan (AQMP) (it is noted that the SCAQMD has recently adopted the 2022 AQMP, which is awaiting final approval by the USEPA). The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the EPA. The plan’s pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG’s 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG’s latest growth forecasts. (SCAG’s latest growth forecasts were defined in consultation with local governments and with reference to local general plans.) The Proposed Project is subject to the SCAQMD’s AQMP.</p> <p>According to the SCAQMD, in order to determine consistency with SCAQMD’s air quality planning two main criteria must be addressed. These criteria are discussed below.</p> <p><u>Criterion 1:</u> With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment. The following two questions must be addressed to satisfy this criterion:</p> <p><i>Would the project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new air quality violations?</i></p> <p>As shown in Table 3, 5, and 6 in Section IIIb, below, the Proposed Project would result in emissions that would be below the SCAQMD regional and localized thresholds during both construction and operations. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations and would not have the potential to cause or affect a violation of the ambient air quality standards.</p> <p><i>Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?</i></p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>As shown in Tables 3 and 6 (see Section IIIb, below), the Proposed Project would be below the SCAQMD regional thresholds for construction and operations. Because the Proposed Project would result in less than significant regional emission impacts, it would not delay the timely attainment of air quality standards or AQMP emissions reductions.</p> <p><u>Criterion 2:</u> With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the SoCAB focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining Project consistency focuses on whether or not the Proposed Project exceeds the assumptions utilized in preparing the forecasts presented its air quality planning documents. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three questions outlined below. The following discussion provides an analysis of each of these questions.</p> <p><i>Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the 2016 AQMP?</i></p> <p>A project is consistent with regional air quality planning efforts in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the SCAQMD air quality plans. Generally, three sources of data form the basis for the projections of air pollutant emissions in Moreno Valley. Specifically, SCAG's Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG) provides regional population forecasts for the region and SCAG's RTP/SCS provides socioeconomic forecast projections of regional population growth. The City of Moreno Valley General Plan is referenced by SCAG in order to assist forecasting future growth in the City.</p> <p>The Project Site has a General Plan land use designation of Downtown Center (DC). The Project is proposing a commercial/retail development consisting of three mixed use medical/office buildings, two drive-thru food service buildings, one retail/restaurant building, and one convenience store building associated with a gasoline station with 12 fueling positions. The Project is not proposing to amend the City General Plan and is consistent with all land use designations applied to the site. Additionally, the Project Site is located within in a rapidly urbanizing area surrounded by predominately urban residential uses. As a result of proposing a mix of commercial land uses in an area devoid of such uses and surrounded heavily by residences, the Project can be identified for its "location efficiency". Location efficiency describes the location of the Project relative to the type of urban landscape its proposed to fit within. In general, compared to the statewide average, a project with location efficiency can realize automotive vehicle mile trip (VMT) reductions between 10 and 65 percent. The Project would locate complementary commercial land uses in close proximity to existing offsite residential uses, thereby providing commercial and work options to the existing, nearby residents currently living near the site. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the statewide average and would result in corresponding reductions in transportation-related emissions, a primary goal of the 2016 AQMP. Thus, the Project is consistent with the City of Moreno Valley General Plan and is therefore consistent with the types, intensity, and patterns of land use envisioned for the site vicinity in the 2016 RTP/SCS and RCPG. As a result, the Project would not conflict with the land use assumptions or exceed the population or job growth projections used by SCAQMD to develop the 2016 AQMP. The City's population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City; and these are used by SCAG in all phases of implementation and review. Additionally, as the SCAQMD has incorporated these same projections into their air quality planning efforts, it can be concluded that the Proposed Project would be consistent with the projections. (SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans). Therefore, the Proposed Project would be considered consistent with the population, housing, and employment growth projections utilized in the preparation of SCAQMD's air quality plans.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>Would the project implement all feasible air quality mitigation measures?</i></p> <p>In order to further reduce emissions, the Project would be required to comply with emission reduction measures promulgated by the SCAQMD, such as SCAQMD Rules 201, 402, 403, and 1113. SCAQMD Rule 402 prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. SCAQMD Rule 403 requires fugitive dust sources to implement Best Available Control Measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. SCAQMD 1113 requires manufacturers, distributors, and end-users of architectural and industrial maintenance coatings to reduce Reactive Organic Gas (ROG) emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories. Rule 201 requires a “Permit to Construct” prior to the installation of any equipment “the use of which may cause the issuance of air contaminants . . .”, such as gasoline dispensers. Rule 461 prohibits the transfer or allowance of the transfer of gasoline into stationary tanks at a gasoline dispensing facility unless a CARB-certified Phase I vapor recovery system is used, and further prohibits the transfer or allowance of the transfer of gasoline from stationary tanks into motor vehicle fuel tanks at a gasoline dispensing facility unless a CARB-certified Phase II vapor recovery system is used during each transfer. Vapor recovery systems collect gasoline vapors that would otherwise escape into the air during bulk fuel delivery (Phase I) or fuel storage and vehicle refueling (Phase II). Phase I vapor recovery system components include the couplers that connect tanker trucks to the underground tanks, spill containment drain valves, overflow prevention devices, and vent pressure/vacuum valves. Phase II vapor recovery system components include gasoline dispensers, nozzles, piping, break away hoses, face plates, vapor processors, and system monitors. Rule 461 also requires fuel storage tanks to be equipped with a permanent submerged fill pipe tank that prevents the escape of gasoline vapors. In addition, all gasoline must be stored underground with valves installed on the tank vent pipes to further control gasoline emissions. Rule 1401 requires new source review of any new, relocated, or modified permit units that emit Toxic Air Contaminants (TACs), such as gasoline dispensers. As such, the Proposed Project meets this consistency criterion.</p> <p><i>Would the project be consistent with the land use planning strategies set forth by SCAQMD air quality planning efforts?</i></p> <p>The AQMP contains air pollutant reduction strategies based on SCAG’s latest growth forecasts, and SCAG’s growth forecasts were defined in consultation with local governments and with reference to local general plans. The Proposed Project is consistent with the land use designation and development density presented in the City’s General Plan and therefore, would not exceed the population or job growth projections used by the SCAQMD to develop the AQMP.</p> <p>In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of a Project on air quality. The Proposed Project would not result in a long-term impact on the region’s ability to meet state and federal air quality standards. The Proposed Project’s long-term influence would also be consistent with the goals and policies of the SCAQMD’s 2016 AQMP.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**

By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project’s individual emissions exceed its identified significance thresholds, the project would be cumulatively considerable. Projects that do not exceed significance thresholds would not be considered cumulative considerable.

A portion of the Proposed Project’s air quality impacts are attributable to construction activities. The majority of the long-term air quality impacts would be due to the operation of motor vehicles traveling to and from the site. For purposes of impact assessment, air quality impacts have been separated into construction impacts and operational impacts.

**Regional Construction Emission Impacts**

Construction-generated emissions are temporary and short-term but have the potential to represent a significant air quality impact. The basic sources of short-term emissions that will be generated through construction of the Proposed Project will be from grading activities and the from the operation of the construction vehicles (i.e. trenchers, dump trucks). Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. Construction activities would be subject to SCAQMD Rule 403, which requires taking reasonable precautions to prevent the emissions of fugitive dust, such as using water or chemicals, where possible, for control of dust during the clearing of land and other construction activities.

Construction-generated emissions associated the Proposed Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. According to information provided by the Project proponent, construction is anticipated to be completed in three phases and last approximately eighteen months. See Appendix A for more information regarding the construction assumptions, including construction equipment, phasing and duration, used in this analysis.

Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in Table 3. Construction-generated emissions are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD’s thresholds of significance.

<b>Table 3. Construction-Related Emissions (Regional Significance Analysis)</b>						
<b>Construction Year</b>	<b>Pollutant (pounds per day)</b>					
	<b>ROG</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
Construction Year One	5.52	39.9	37.1	0.05	7.17	4.32
Construction Year Two	1.20	11.6	28.8	0.04	2.28	1.15
<i>SCAQMD Regional Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Exceed SCAQMD Regional Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: ECORP 2023a. CalEEMod version 2022.1. Refer to Appendix A, Attachment A for Model Data Outputs. Notes: Emissions taken of the season, summer or winter, with the highest outputs. Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour.

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>As shown in Table 3, emissions generated during Project construction would not exceed the SCAQMD's regional thresholds of significance. Therefore, criteria pollutant emissions generated during Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard, and no health effects from Project criteria pollutants would occur.</p> <p><b>Construction Localized Significance Threshold</b></p> <p>As previously described, the Project is proposing onsite construction and offsite improvements in the areas adjacent to the Project Site. The nearest sensitive receptors that would be impacted by onsite activities consist of single-family residences located adjacent to the eastern site boundary of the Project Site. The nearest sensitive receptors that would be impacted by offsite construction improvements (widening Cactus Avenue and installing traffic signal at the intersection of Cactus Avenue and Lynn Lee Lane) consist of a single-family residential neighborhood south of the Project Site across Cactus Avenue. For onsite and offsite construction, the nearest sensitive receptors are located less than 25 meters away. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific level proposed projects.</p> <p>For this Project, the appropriate Sensitive Receptor Area (SRA) for the localized significance thresholds is the Perris Valley, SRA 24. LSTs apply to CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. As previously described, the SCAQMD has produced lookup tables for projects that disturb one, two and five acres. The Project Site is approximately 8.4 acres and thus would disturb more than five acres during construction. As previously described, the SCAQMD has produced lookup tables for projects that disturb less than or equal to five acres daily. The SCAQMD has also issued guidance on applying the CalEEMod emissions software to LSTs for projects greater than five acres. Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, Table 4 is used to determine the maximum daily disturbed acreage for comparison to LSTs. It is noted that Phase 1 and 2 site preparation and grading would occur simultaneously and all construction equipment for Phase 1 and Phase 2 building construction, paving and architectural coating is the same.</p>				

**Table 4. Equipment-Specific Grading Rates**

<b>Construction Phase</b>	<b>Equipment Type</b>	<b>Acres Graded/ Disturbed per 8- Hour Day</b>	<b>Equipment Quantity</b>	<b>Operating Hours per Day</b>	<b>Acres Graded per Day</b>
Phase 1 & 2 Site Preparation	Rubber Tired Dozer	0.5	3	8	1.5
	Tractors/Loaders/Backhoes	0.5	4	8	2.0
<b>Phase 1 &amp; 2 Site Preparation Total:</b>					<b>3.5</b>
Phase 1 & 2 Site Grading	Grader	0.5	1	8	0.5
	Rubber Tired Dozer	0.5	1	8	0.5
	Tractors/Loaders/Backhoes	0.5	3	8	1.5
	Excavators	0.0	1	8	0.0
<b>Phase 1 &amp; 2 Grading Total:</b>					<b>2.5</b>
Phase 1 & 2 Building Construction, Paving and Architectural Coating	Crane	0.0	1	7	0.0
	Forklifts	0.0	3	8	0.0
	Generator Sets	0.0	1	8	0.0
	Tractor/Loaders/Backhoes	0.5	3	7	1.5
	Welders	0.0	1	8	0.0
	Pavers	0.0	2	8	0.0
	Paving Equipment	0.0	2	8	0.0
	Rollers	0.0	2	8	0.0
	Air Compressors	0.0	1	6	0.0
<b>Phase 1 &amp; 2 Building Construction, Paving and Architectural Coating Total:</b>					<b>1.5</b>
Phase 3 Site Preparation	Rubber Tired Dozer	0.5	1	8	0.5
	Tractors/Loaders/Backhoes	0.5	1	8	0.5
<b>Phase 3 Site Preparation Total:</b>					<b>1.0</b>
Phase 3 Site Grading	Grader	0.5	1	8	0.5
<b>Phase 3 Grading Total:</b>					<b>0.5</b>
Phase 3 Building Construction, Paving and Architectural Coating	Cranes	0.0	1	7	0.0
	Tractors/Loaders/Backhoes	0.5	1	8	0.5
	Welders	0.0	1	8	0.0
	Pavers	0.0	1	8	0.0
	Paving Equipment	0.0	1	8	0.0
	Rollers	0.0	1	8	0.0
	Air Compressors	0.0	1	8	0.0
<b>Phase 3 Building Construction, Paving and Architectural Coating Total:</b>					<b>0.5</b>

As described previously, the SCAQMD has produced lookup tables for projects that disturb one, two and five acres. As shown in Table 4, Project implementation could potentially disturb a total maximum of 3.5 acres daily during Phase 1 and 2 site preparation, 2.5 acres daily during Phase 1 and 2 site grading, 1.5

**ISSUES & SUPPORTING INFORMATION SOURCES:**

Potentially Significant Impact

Less Than Significant with Mitigation Incorporated

Less Than Significant Impact

No Impact

acres daily during the combined Phase 1 and 2 construction/paving/painting phase, 1.0 acres daily during Phase 3 site preparation, 0.5 acre daily during Phase 3 site grading, and 0.5 acre daily during the combined Phase 3 construction/paving/painting phase. The LST threshold value for a 2-acre site was used for Phase 1 and site preparation and Phase 1 and 2 site grading. The LST threshold value for a 1-acre site was used for Phase 1 and 2 building construction, paving and architectural coating, Phase 3 site preparation, Phase 3 site grading, and Phase 3 building construction, paving and architectural coating.

LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The nearest sensitive receptors to onsite and offsite construction activity are residences located less than 25 meters away. Notwithstanding, the SCAQMD Methodology explicitly states: "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." Therefore, LSTs for receptors located at 25 meters were utilized in this analysis. The SCAQMD's methodology clearly states that "offsite mobile emissions from a project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "onsite" emissions outputs were considered. Table 5 presents the results of localized emissions.

<b>Table 5. Construction-Related Emissions (Localized Significance Analysis)</b>				
<b>Activity</b>	<b>Onsite Pollutant (pounds per day)</b>			
	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<b>Phase 1 &amp; 2 Site Preparation</b>				
Phase 1 & 2 Site Preparation	39.7	35.5	6.92	3.29
<i>SCAQMD Localized Significance Threshold (2 acre of disturbance at 25 meters)</i>	170	883	7	4
<b>Phase 1 &amp; 2 Site Grading</b>				
Phase 1 & 2 Site Grading	20.0	19.7	2.78	1.76
<i>SCAQMD Localized Significance Threshold (2 acre of disturbance at 25 meters)</i>	170	883	7	4
<b>Phase 1 &amp; 2 Building Construction, Paving and Architectural Coating</b>				
Phase 1 & 2 Building Construction, Paving & Painting	20.76	24.35	1.0	0.92
<i>SCAQMD Localized Significance Threshold (1 acre of disturbance at 25 meters)</i>	118	602	4	3
<b>Phase 3 Site Preparation</b>				
Phase 3 Site Preparation	11.6	10.3	22.2	1.35
<i>SCAQMD Localized Significance Threshold (1 acre of disturbance at 25 meters)</i>	118	602	4	3
<b>Phase 3 Site Grading</b>				
Phase 3 Site Grading	3.40	3.64	0.33	0.18

<i>SCAQMD Localized Significance Threshold (1 acre of disturbance at 25 meters)</i>	118	602	4	3
<b>Phase 3 Building Construction, Paving and Architectural Coating</b>				
Phase 3 Building Construction, Paving & Painting	19.19	24.25	0.92	0.85
<i>SCAQMD Localized Significance Threshold (1 acre of disturbance at 25 meters)</i>	118	602	4	3
<b>Exceed SCAQMD Localized Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: ECORP 2023a. CalEEMod version 2022.1. Refer to Appendix A, Attachment A for Model Data Outputs.  
Notes: Emissions taken of the season, summer or winter, with the highest outputs. Emission reduction/credits for construction emissions are applied based on the required implementation of SCAQMD Rule 403. The specific Rule 403 measures applied in CalEEMod include the following: sweeping/cleaning adjacent roadway access areas daily; washing equipment tires before leaving the construction site; water exposed surfaces three times daily; and limit speeds on unpaved roads to 15 miles per hour.

Table 5 shows that the emissions of these pollutants during construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during construction activities. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative. The SCAQMD Environmental Justice Enhancement Initiative program seeks to ensure that everyone has the right to equal protection from air pollution. Therefore, significant impacts would not occur concerning LSTs during construction activities. No mitigation is required.

**Regional Operational Emission Impacts**

Implementation of the Project would result in long-term operational emissions of criteria air pollutants such as PM<sub>10</sub>, PM<sub>2.5</sub>, CO, and SO<sub>2</sub> as well as O<sub>3</sub> precursors such as ROG and NO<sub>x</sub>. Project-generated increases in emissions would be predominantly associated with motor vehicle use. As previously described, operational air pollutant emissions were based on the Project Site plans and traffic trip generation rates (K2 Traffic Engineering 2020 and Ruetters & Schuler Civil Engineers 2023a, Appendix F). Long-term operational emissions attributable to the Project are identified in Table 6 and compared to the operational significance thresholds promulgated by the SCAQMD.

Emission Source	Pollutant (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summer Emissions</b>						
Area	6.99	0.03	3.90	0.00	0.01	0.01
Energy	0.05	0.84	0.70	0.01	0.06	0.06
Mobile	23.80	19.8	179.00	0.42	14.20	2.77
<b>Total:</b>	<b>30.84</b>	<b>20.67</b>	<b>183.6</b>	<b>0.43</b>	<b>14.27</b>	<b>2.84</b>
<i>SCAQMD Regional Significance Threshold</i>	55	55	550	150	150	55
<b>Exceed SCAQMD Regional Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Winter Emissions</b>						



<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Area	6.35	0.00	0.00	0.00	0.00
Energy	0.05	0.84	0.70	0.01	0.06
Mobile	22.10	21.30	152.00	0.39	14.20
<b>Total:</b>	<b>28.50</b>	<b>22.14</b>	<b>152.70</b>	<b>0.40</b>	<b>14.26</b>
<i>SCAQMD Regional Significance Threshold</i>	55	55	550	150	150
<b>Exceed SCAQMD Regional Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<p>Source: ECORP 2023a. CalEEMod version 2022.1. Refer to Appendix A, Attachment A for Model Data Outputs. Notes: Emission projections predominately based on CalEEMod model defaults for Riverside County and Project Site plans. Average daily vehicle trips provided K2 Traffic Engineering, Inc. (2020). Area source emissions for the gasoline station include ROG released gasoline vapor during dispensing activities. Gasoline vapor emissions are calculated based on an emission factor of 1.27 pounds per 1,000 gallons of gasoline dispensed (CAPCOA 1997) and the prediction of 3,287.6 gallons of gasoline dispensed per day (3,287.6 x 365 = 1,200,000 gallons annually) as provided by the Project applicant [(1,200,000/1,000) x 1.27 = 1,524 pounds annually. 1,524/365 = 4.17 pounds daily].</p> <p>As shown in Table 6, the Project's emissions would not exceed any SCAQMD thresholds for any criteria air pollutants during operation.</p> <p>The Riverside County portion of the SoCAB is listed as a nonattainment area for federal O<sub>3</sub> and PM<sub>2.5</sub> standards and is also a nonattainment area for the state standards for O<sub>3</sub>, PM<sub>2.5</sub> and PM<sub>10</sub>. O<sub>3</sub> is a health threat to persons who already suffer from respiratory diseases and can cause severe ear, nose and throat irritation and increases susceptibility to respiratory infections. PM can adversely affect the human respiratory system. As shown in Table 6, the Proposed Project would result in increased emissions of the O<sub>3</sub> precursor pollutants ROG and NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, however, the correlation between a project's emissions and increases in nonattainment days, or frequency or severity of related illnesses, cannot be accurately quantified. The overall strategy for reducing air pollution and related health effects in the SCAQMD is contained in the SCAQMD 2016 AQMP. The AQMP provides control measures that reduce emissions to attain federal ambient air quality standards by their applicable deadlines such as the application of available cleaner technologies, best management practices, incentive programs, as well as development and implementation of zero and near-zero technologies and control methods. The CEQA thresholds of significance established by the SCAQMD are designed to meet the objectives of the AQMP and in doing so achieve attainment status with state and federal standards. As noted above, the Project would increase the emission of these pollutants, but would not exceed the thresholds of significance established by the SCAQMD for purposes of reducing air pollution and its deleterious health effects.</p> <p><b><u>Operational Localized Significance Threshold</u></b></p> <p>According to the SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project only if the project includes stationary sources (e.g., smokestacks) or attracts heavy-duty trucks that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Project does not include such uses. While the Project does propose gasoline dispensers, a source of the TAC such as benzene, the SCAQMD LST protocol does not address this pollutant. Instead, the emission of gasoline vapor and other components from Project operations (Diesel Particulate Matter [DPM] from delivery trucks) is addressed in the health risk assessment prepared for the Project and described in detail below. Therefore, in the case of the Proposed Project, the operational phase LST protocol does not need to be applied.</p>					
c) Expose sensitive receptors to substantial pollutant concentrations?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b>					

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over age 65, children under age 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The nearest sensitive receptors to the Project Site are residences directly adjacent to the eastern site boundary. There are also sensitive residential receptors positioned south of the Project Site, across Cactus Avenue. The Riverside University Health System Regional Medical Center, which provides nonemergency medical services intended to cover acute illnesses, is located approximately 150 feet west of the Project Site, directly across Nason Street. The primary care facility of the Riverside University Health System Regional Medical Center is located approximately 1,200 feet to the west of the Project Site.</p>				
<p><i>Construction-Generated Air Contaminants</i></p>				
<p>Construction-related activities would result in temporary, short-term Proposed Project-generated emissions of DPM, ROG, Nox, CO, and PM<sub>10</sub> from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); soil hauling truck traffic; paving; and other miscellaneous activities. The portion of the SoCAB which encompasses the Project area is designated as a nonattainment area for federal O<sub>3</sub> and PM<sub>2.5</sub> standards and is also a nonattainment area for the state standards for O<sub>3</sub>, PM<sub>2.5</sub> and PM<sub>10</sub>. Thus, existing O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> levels in the SoCAB are at unhealthy levels during certain periods. However, as shown in Table 3 and Table 5, the Project would not exceed the SCAQMD regional or localized significance thresholds for emissions.</p>				
<p>The health effects associated with O<sub>3</sub> are generally associated with reduced lung function. Because the Project would not involve construction activities that would result in O<sub>3</sub> precursor emissions (ROG or Nox) in excess of the SCAQMD thresholds, the Project is not anticipated to substantially contribute to regional O<sub>3</sub> concentrations and the associated health impacts.</p>				
<p>CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. The Project would not involve construction activities that would result in CO emissions in excess of the SCAQMD thresholds. Thus, the Project's CO emissions would not contribute to the health effects associated with this pollutant.</p>				
<p>Particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing. For construction activity, DPM is the primary TAC of concern. PM<sub>10</sub> exhaust is considered a surrogate for DPM as all diesel exhaust is considered to be DPM. As with O<sub>3</sub> and Nox, the Project would not generate emissions of PM<sub>10</sub> or PM<sub>2.5</sub> that would exceed the SCAQMD's thresholds. Accordingly, the Project's PM<sub>10</sub> and PM<sub>2.5</sub> emissions are not expected to cause any increase in related regional health effects for these pollutants.</p>				
<p>In summary, Project construction would not result in a potentially significant contribution to regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Furthermore, the Project has been evaluated against the SCAQMD's LSTs for construction. As previously stated, LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative and can be used to assist lead agencies in analyzing localized impacts associated with Project-specific level of proposed projects. The SCAQMD environmental Justice Enhancement Initiative program seeks to ensure that everyone has the right to equal protection from air pollution. The Environmental Justice Program is divided into three categories, with the LST protocol promulgated under Category I: <i>Further-Reduced Health Risk</i>. As shown in Table 5, the emissions of pollutants on the peak day of construction would not result in significant</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>concentrations of pollutants at nearby sensitive receptors. Thus, the fact that onsite Project construction emissions would be generated at rates below the LSTs for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> demonstrates that the Project would not adversely impact vicinity sensitive receptors.</p>				
<p><i>Operational Air Contaminants</i></p>				
<p>Operation of the Project would result in the development of sources of air toxins. Specifically, the Project would be a source of gasoline vapors such as benzene, methyl tertiary-butyl ether, toluene, and xylene. CARB identifies benzene as a TAC and is the primary TAC of concern associated with gas stations. Benzene is highly carcinogenic and occurs throughout California. According to the California Air Pollution Control Officers Association (CAPCOA), benzene is the most important substance driving cancer risk, while xylene, another air pollutant associated with gasoline stations, is the only substance which is associated with acute adverse health effects. According to CAPCOA, not until the benzene emissions are three orders of magnitude above the rate of an increase of 10 per million cancer risk, do the emissions of xylene begin to cause acute adverse health effects. According to SCAQMD's <i>2015 Risk Assessment Procedures for Rules 1401, 1401.1, &amp; 212</i>, benzene is the TAC which drives potential health risk, accounting for 87 percent of cancer risk from gasoline vapors. Benzene also has non-cancer health effects. Furthermore, a review of SCAQMD's <i>2015 Risk Assessment Procedures for Rules 1401, 1401.1, 212</i> shows that benzene constitutes more than three to four times the weight of gasoline than ethylbenzene and naphthalene, respectively. The majority of benzene emitted in California comes from motor vehicles, including evaporative leakage and unburned fuel exhaust.</p>				
<p>Gasoline vapors, including benzene, could be released by the Proposed Project's fueling station during the filling of stationary underground storage tanks and during the transfer from those underground tanks to individual vehicles. Therefore, a Health Risk Assessment was prepared for the Proposed Project, which is summarized below and discussed in detail in Appendix A.</p>				
<p><b><u>Project Health Risk Assessment</u></b></p>				
<p>The Proposed Project is proposing a gasoline dispensing facility. As described in Section IIIa, above, the SCAQMD has stringent requirements for the control of gasoline vapor emissions from gasoline-dispensing facilities through SCAQMD Rule 461, <i>Gasoline Transfer and Dispensing</i> and SCAQMD Rule 1401, <i>New Source Review of Toxic Air Contaminants</i>. In addition, California has statewide limits on the benzene content in gasoline, which greatly reduces the toxic potential of gasoline emissions.</p>				
<p>Project related onsite sources were modeled into the AERMOD model to account for the fueling, spillage and hose permeation that could occur at the fueling canopy, loading and breathing from the underground storage tanks, and heavy-duty truck movement on area roadways carrying fuel to the Project Site. A conservative estimate of two fuel trucks per day was assumed in the modeling. Fueling station throughput for the Project Site was modeled using the estimated gasoline throughput of 1,200,000 gallons per year provided by the applicant. Emission calculations for fueling can be found in Appendix A, Attachment B (ECORP 2023a).</p>				
<p><b><u>Cancer Risk</u></b></p>				
<p>Operational cancer risk calculations for existing residential receptors are based on 70-, 30-, and 9-year exposure periods and worker receptors are based on a 25-year exposure period to for operations. The calculated cancer risk accounts for 350 days per year of exposure to residential receptors. While the average American spends 87 percent of their life indoors, neither the pollutant dispersion modeling nor the health risk calculations account for the reduced exposure structures provide. Instead, health risk calculations account for the equivalent exposure of continual outdoor living. The calculated carcinogenic risk at Project vicinity receptors is depicted in Table 7.</p>				

**Table 7. Maximum Cancer Risk Summary**

Maximum Exposure Scenario	Total Maximum Risk
<b>Project Operations</b>	
70-Year Exposure Resident	0.84
30-Year Exposure Resident	0.74
9-Year Exposure Resident	1.84
25-Year Exposure Worker	0.02
<i>Significance Threshold</i>	<i>10</i>
<b>Exceed Threshold?</b>	<b>No</b>

Source: ECORP Consulting 2023a. Appendix A, Attachment B.

SCAQMD’s cancer risk threshold for an exposure of substantial air toxics is emission of carcinogenic or toxic contaminants that exceed the maximum individual cancer risk of 10 in one million. As shown in Table 7, impacts related to cancer risk for all modeled scenarios would be below the 10 in one million threshold for Project operations. These calculations do not account for any pollutant-reducing components inherent to the Project or the Project Site.

The Maximumly Exposed Individual Resident (MEIR) for operational emissions is located south of the Project Site across Cactus Avenue. The Maximally Exposed Individual Worker (MEIW) for Project operations is the Riverside University Health System Regional Medical Center located west of the Project Site across Nason Street. In addition, the Point of Maximum Impact (PMI) is located on the roadway south of the Project Site on Cactus Avenue (Appendix A, Attachment B).

**Non-Carcinogenic Hazards**

In addition to cancer risk, the significance thresholds for TAC exposure requires an evaluation of non-cancer risk stated in terms of a hazard index. Non-cancer chronic impacts are calculated by dividing the annual average concentration by the REL for that substance. The REL is defined as the concentration at which no adverse non-cancer health effects are anticipated. The potential for acute non-cancer hazards is evaluated by comparing the maximum short-term exposure level to an acute REL. RELs are designed to protect sensitive individuals within the population. The calculation of acute non-cancer impacts is similar to the procedure for chronic non-cancer impacts.

An acute or chronic hazard index of 1.0 is considered individually significant. The hazard index is calculated by dividing the acute or chronic exposure by the REL. The highest maximum chronic hazard indexes for residents and workers due to Project fueling operations are presented in Table 8.

**Table 8. Maximum Non-Carcinogenic Health Risk Summary**

Maximum Exposure Scenario	Health Hazard Index	
	Chronic	Acute
Resident (70 Year for Chronic)	0.0028	0.0588
Worker (25 Year for Chronic)	0.0010	0.0588
<i>Significance Threshold</i>	<i>1</i>	<i>1</i>
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>

Source: ECORP 2023a. Appendix A, Attachment B.

As shown in Table 8, impacts related to non-cancer risk (chronic and acute hazard index) as a result of the Project Site would not surpass significance thresholds.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b><u>Carbon Monoxide Hot Spots</u></b></p> <p>It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Concentrations of CO are a direct function of the number of vehicles, length of delay, and traffic flow conditions. Under certain meteorological conditions, CO concentrations close to congested intersections that experience high levels of traffic and elevated background concentrations may reach unhealthy levels, affecting nearby sensitive receptors. Given the high traffic volume potential, areas of high CO concentrations, or “hot spots,” are typically associated with intersections that are projected to operate at unacceptable levels of service during the peak commute hours. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. However, transport of this criteria pollutant is extremely limited, and CO disperses rapidly with distance from the source under normal meteorological conditions. Furthermore, vehicle emissions standards have become increasingly more stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SoCAB is designated as in attainment. Detailed modeling of Project-specific CO “hot spots” is not necessary and thus this potential impact is addressed qualitatively.</p> <p>A CO “hot spot” would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur. The analysis prepared for CO attainment in the SCAQMD’s <i>1992 Federal Attainment Plan for Carbon Monoxide in Los Angeles County and a Modeling and Attainment Demonstration</i> prepared by the SCAQMD as part of the 2003 AQMP can be used to demonstrate the potential for CO exceedances of these standards. The SCAQMD is the air pollution control officer for much of southern California. The SCAQMD conducted a CO hot spot analysis as part of the 1992 CO Federal Attainment Plan at four busy intersections in Los Angeles County during the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which has a traffic volume of approximately 100,000 vehicles per day. Despite this level of traffic, the CO analysis concluded that there was no violation of CO standards. In order to establish a more accurate record of baseline CO concentrations affecting the Los Angeles, a CO “hot spot” analysis was conducted in 2003 at the same four busy intersections in Los Angeles at the peak morning and afternoon time periods. This “hot spot” analysis did not predict any violation of CO standards. The highest one-hour concentration was measured at 4.6 ppm at Wilshire Boulevard and Veteran Avenue and the highest eight-hour concentration was measured at 8.4 ppm at Long Beach Boulevard and Imperial Highway. Thus, there was no violation of CO standards.</p> <p>Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD), the air pollution control officer for the San Francisco Bay Area, concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact.</p> <p>The Proposed Project is anticipated to result in 5,752 daily trips (K2 Traffic Engineering, Inc. 2020, Appendix F). Thus, the Proposed Project would not generate traffic volumes at any intersection of more than 100,000 vehicles per day (or 44,000 vehicles per day) and there is no likelihood of the Project traffic exceeding CO values. The impact is less than significant, and no mitigation is required.</p>				
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Typically, odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).</p> <p>With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals have the ability to smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; in fact, an odor that is offensive to one person (e.g., from a fast-food restaurant) may be perfectly acceptable to another. It is also important to note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity.</p> <p>Quality and intensity are two properties present in any odor. The quality of an odor indicates the nature of the smell experience. For instance, if a person describes an odor as flowery or sweet, then the person is describing the quality of the odor. Intensity refers to the strength of the odor. For example, a person may use the word "strong" to describe the intensity of an odor. Odor intensity depends on the odorant concentration in the air. When an odorous sample is progressively diluted, the odorant concentration decreases. As this occurs, the odor intensity weakens and eventually becomes so low that the detection or recognition of the odor is quite difficult. At some point during dilution, the concentration of the odorant reaches a detection threshold. An odorant concentration below the detection threshold means that the concentration in the air is not detectable by the average human.</p> <p>During construction, the Proposed Project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the site. However, these emissions are short-term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, construction odors would not adversely affect a substantial number of people to odor emissions.</p> <p>However, as previously described, the ability to detect odors varies considerably among the population and is inherently subjective in nature. For instance, the Project proposes high turnover, fast-food restaurants, which are a potential source of odors that may affect certain people. Cooking odors (molecules) generated by the combustion of animal and vegetable matter result in a complex mixture of reactive odorous gases. A small percentage of these odors may be absorbed by the grease particles, but the vast majority exist separately in the airstream.</p> <p>The two common methods of abating odor from cooking are (1) the use of an odor oxidant (potassium permanganate) that oxidizes the molecules to solids and then retains them; and (2) a spray odor neutralizer system. Either of the above-mentioned types of odor control can remove 85 to 90 percent of the molecules, depending on the type of cooking. However, determining the efficiency of odor control is subjective, as testing is usually conducted by people rather than machines.</p> <p>The restaurant uses would be required to comply with all state regulations associated with cooking equipment and controls, such as grease filtration and removal systems, exhaust hood systems, and blowers to move air into the hood systems, through air cleaning equipment, and then outdoors. The proposed restaurant uses would be equipped with kitchen exhaust systems and pollution/odor control systems. Pollution/odor control systems typically include smoke control, odor control, and exhaust fan sections. Such equipment would ensure that pollutants associated with smoke and exhaust from cooking surfaces would be captured and filtered, allowing only filtered air to be released into the atmosphere.</p> <p>The Project Site could be considered a source of unpleasant odors by some given its proposed use as a gasoline dispensing station; however, as previously stated, the SCAQMD has stringent requirements for the control of gasoline vapor emissions from gasoline-dispensing facilities as articulated in SCAQMD Rule 461. The Proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Rule 402 prohibits the discharge from any source that causes nuisance,</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

annoyance, or discomfort to a considerable number of persons. Adherence to these rules would result in a less than significant impact related to operational odor emissions.

**Sources:**

1. ECORP Consulting, Inc., 2023a. *Cactus & Nason Emissions Assessment 2023 Update*. (Appendix A)
2. K2 Traffic Engineering Inc. 2020. *Cactus Nason Plaza at NEC of Cactus Ave and Nason Street Focused Traffic Impact Study*. (Appendix F)
3. Ruettgers & Schuler Civil Engineers. 2023a. *Supplemental Traffic Analysis for Proposed Mixed Use Project at Nason Street and Cactus Avenue, Moreno Valley* (Appendix F)

**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 Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	-------------------------------------	--------------------------	--------------------------

**Response:**

A Biological Technical Report and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis was prepared by ECORP in August 2019 (ECORP 2019a, Appendix B). Additionally, a Biological Letter Report was prepared as an addendum to the 2019 Biological Technical Report and MSHCP Analysis in February 2023 to update the 2019 report (ECORP 2023b, Appendix B). As part of the Updated Biological Resource Assessment, a reconnaissance-level biological survey was conducted to identify potential issues and ensure compliance with state and federal regulations regarding listed, protected, and sensitive species in January 2023. Prior to conducting the biological reconnaissance survey, ECORP biologists performed a literature review using the California Department of Fish and Wildlife’s (CDFW) California Natural Diversity Data Base and the California Native Plant Society’s (CNPS’) Electronic Inventory to determine the special-status plant and wildlife species that have been documented in the vicinity of the Project Site. The Project Site is located within the Western Riverside County MSHCP. The Biological Technical Report also fulfills the reporting requirements for sensitive biological resources covered under the MSHCP.

The Project Site is an undeveloped lot dominated primarily by nonnative vegetation. Although no recent disturbances were evident at the time of the January 2023 survey, a review of aerial imagery revealed that the Project Site has consistently undergone mechanical disturbance (e.g., discing) since the early 2000s.

*Special-Status Plants*

The literature search documented 59 special-status plant species (of those, 11 are federally and/or state listed and 33 are covered by the MSHCP). However, due to elevational factors and the current lack of suitable habitat for special-status plant species on the Project Site, all of the special-status plant species identified in the literature review were presumed absent from the Project Site. No special status plant species were identified during the January 2023 survey. Additionally, the removal of annual grassland vegetation on the Project Site would not contribute to the overall decline of any special status plant species identified in the literature review and database search (ECORP 2023b; ECORP 2019a). No impact to special status plants would occur as a result of the Proposed Project.

*Special-Status Wildlife*

No special-status wildlife were observed during the January 2023 survey. The literature search documented 57 special-status wildlife species in the vicinity of the Project Site, 17 of which are federally and/or state-listed; however, 37 species are presumed absent due to the lack of suitable habitat. Of the remaining 20 species, 40 are covered by the MSHCP. Eighteen of the remaining 20 species were found

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>to have a low potential to occur due to the lack of high-quality suitable habitat on the Project Site. Furthermore, the frequent mechanical disturbances on site, proximity to commercial and residential development, and the presence of anthropogenic influences on site likely preclude these species from occurring on or adjacent to the site (ECORP 2023b; ECORP 2019a). A less than significant impact would occur to these species.</p> <p>Two wildlife species have a moderate potential to occur: Crotch bumble bee (<i>Bombus crotchii</i>) and burrowing owl (<i>Athene cunicularia</i>). Additionally, the Project Site and vicinity has suitable habitat for nesting birds and raptors. The Project Site is also within the Stephens' kangaroo rat (<i>Dipodomys stephensi</i>) fee assessment area (ECORP 2023b; ECORP 2019a). Impacts to these resources are further discussed below.</p> <p><b><u>Nesting Birds and Raptors</u></b> The trees immediately adjacent to the Project Site and the nonnative vegetation on the Project Site could provide nesting habitat for nesting birds and raptors protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. If construction of the Proposed Project occurs during the bird breeding season (typically February 1 through August 31), ground-disturbing construction activities could directly affect birds protected by the MBTA and their nests located immediately adjacent to the Project Site, through increased noise, vibrations, and increased human activity (ECORP 2023b; ECORP 2019a). Impacts to nesting birds and raptors would be less than significant with the implementation of Mitigation Measure BIO-1.</p> <p><b><u>Crotch Bumble Bee</u></b> Crotch bumble bee did not appear in the literature review performed prior to the 2019 report; however, this species became a candidate for listing in September 2022 and appeared in the updated literature review. Its potential for occurrence was assessed during the January 2023 biological survey. Due to the presence of suitable grassland habitat and habitat elements (e.g., small mammal burrows and annual grasses for nest locations and nectar sources for feeding) and known recent occurrence data of the species in the vicinity of the Project Site, this species has a moderate potential to occur (ECORP 2023b; ECORP 2019a). Impacts to crotch bumble bee would be less than significant with the implementation of Mitigation Measure BIO-2.</p> <p><b><u>Burrowing Owl</u></b> The Project Site is located within a designated survey area under the MHSCP for burrowing owl. A habitat assessment and focused burrowing owl survey were conducted concurrently with the January 2023 site visit. It was determined that no potential burrow structures were present and burrowing owl has a low potential to occur on the Project Site and vicinity due to the dense vegetation, evidence of frequent mechanical disturbances, and proximity of commercial and residential development. Although the site was found to not provide suitable habitat for burrowing owl, due to the mobile nature of the species, it is possible that burrowing owl could use the site prior to the start of Project activities. If burrowing owl are found to be using or nesting on the Project Site prior to the start of construction due to a change in potential burrow presence, direct impacts in the form of ground disturbance, vegetation removal, habitat loss, and mortality and indirect impacts from construction such as noise and vibrations may occur (ECORP 2023b; ECORP 2019a). Impacts to burrowing owl would be less than significant with the implementation of Mitigation Measure BIO-3.</p> <p><b><u>Stephen's Kangaroo Rat</u></b> While no suitable habitat is present for Stephens' kangaroo rat on the Project Site, the Project Site is located within the Stephens' kangaroo rat fee assessment area (Moreno Valley Municipal Code 8.60). To offset impacts to the species, all applicants for development permits within the fee assessment area must pay an impact and mitigation fee of five hundred dollars (\$500.00) per gross acre located within the parcel to be developed and any offsite areas that are disturbed resulting from related Project activities. Further coordination with the Western Riverside County Regional Conservation Authority (RCA) regarding the mitigation fee may be required (ECORP 2023b; ECORP 2019a). Implementation of Mitigation Measure BIO-4 would reduce impacts to a less than significant level.</p>				



<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>BIO-1 Pre-construction Survey for Nesting Birds:</b> Any ground disturbance activities shall be conducted during the non-breeding season for birds (approximately September 1 through January 31). This will avoid violations of the MBTA and California Fish and Game Code §§ 3503, 3503.5 and 3513. If activities with the potential to disrupt nesting birds are scheduled to occur during the bird breeding season (February 1 through August 31), a preconstruction nesting bird survey shall be conducted no more than three days prior to ground-disturbing activities by a qualified biologist who is experienced in the identification of avian species and conducting nesting bird surveys. The nest surveys shall include the Project Site and adjacent areas where Project activities have the potential to cause nest failure. If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors) are found to be present, avoidance or minimization measures shall be undertaken to avoid potential project related impacts. Measures may include establishment of an avoidance buffer until nesting has been completed and periodic nest monitoring by the Project biologist. The width of the avoidance buffer will be determined by the Project biologist. Typically, this is 300 feet from the nest site in all directions (500 feet is typically recommended by CDFW for raptors), until the juveniles have fledged and there has been no evidence of a second attempt at nesting. The monitoring biologist will monitor the nest(s) during construction and document any findings.</p> <p><b>BIO-2 Presence/Absence Surveys for Crotch Bumble Bee:</b> To avoid adverse effects to Crotch bumble bee that may be present within the Project Site, a qualified biologist knowledgeable of Crotch bumble bee species ecology will conduct a survey of areas that may provide habitat for this species. The qualified biologist shall contact CDFW to request the agency approved survey protocol for Crotch bumble bee and shall follow the agency-accepted protocol when conducting the surveys. The survey will be conducted within one year prior to vegetation removal and/or grading. Surveys should be conducted during the flying season when the species is most likely to be detected above ground, between March 1 and September 1 (Thorp et al 1983). Within 30 days of completing the survey, the qualified biologist shall prepare a Crotch Bumble Bee Survey Report and submit it to the Project proponent. The report shall include, at minimum, a description of the methods to conduct the surveys, a description of suitable habitat areas, and a map of the locations where Crotch bumble bee and any other special-status species were observed. The qualified biologist shall submit CNDDDB forms for any Crotch bumble bees or other special-status species observed during the surveys. The survey report shall also include measures sufficient to avoid “take” or other adverse impacts to Crotch bumble bee, if found during the surveys.</p> <p>If surveys confirm the presence of Crotch bumble bee, and if adverse impacts or “take” of the species cannot be avoided, then the Project proponent will need to obtain an Incidental Take Permit from CDFW. The ITP application shall be submitted to CDFW approximately one year prior to the take or adverse impacts to the species to allow time for the processing of the application and the issuance of the ITP. Adverse impacts or take of this species shall not occur until CDFW has issued the ITP.</p> <p><b>BIO-3 Pre-Construction Surveys for Burrowing Owl:</b> Pre-construction surveys for burrowing owl shall be conducted within the Project Site and adjacent areas prior to the start of ground disturbing activities. The surveys shall follow the methods described in the Western Riverside MSHCP <i>Burrowing Owl Survey Instructions</i> (RCTLMA 2006). According to Western Riverside MSHCP’s <i>Burrowing Owl Survey Instructions</i>, focused burrowing owl surveys shall be conducted because suitable habitat was recorded during the burrowing owl habitat assessment. If burrowing owls and/or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified on the Project Site during the survey and impacts to the species are unavoidable, additional mitigation may need to be implemented, such as implementing a no-disturbance buffer around occupied burrows or seasonal work restrictions. In addition to the focused burrowing owl surveys, preconstruction surveys shall take place within 30-days prior to ground disturbance in accordance with the Western Riverside MSHCP <i>Burrowing Owl Survey Instructions</i> (RCTLMA 2006) and the CDFG <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG 2012).</p> <p><b>BIO-4 Stephens’ Kangaroo Rat Mitigation Fee:</b> In accordance with Moreno Valley Municipal Code 8.60 and to offset impacts to the Stephens’ kangaroo rat, all applicants for development permits within the Stephens’ kangaroo rat fee assessment area must pay an impact and mitigation fee of five hundred dollars (\$500.00) per gross acre located within the parcel to be developed an any offsite areas that are</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>disturbed resulting from related Project activities. Further coordination with the RCA regarding the mitigation fee may be required.</p>				
<p>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  The Project Site consists of disturbed developed land that supports mostly nonnative grass and forb species. Although a formal aquatic delineation was not performed during the updated January 2023 survey, a new potentially jurisdictional drainage and associated riparian vegetation was delineated during the survey. The drainage is located outside of the Project Site, within the 500-foot buffer northwest of the intersection of Cactus Avenue and Nason Street. One non-jurisdictional drainage ditch that led to a concrete drain was documented in 2019 (ECORP 2019a). This drainage was reassessed during the 2023 survey and due to recent disturbances, this drainage is no longer present (ECORP 2023b). The concrete drain, however, was still present on the Project Site.</p> <p>Due to the location of the new potentially jurisdictional feature outside of the Project Site and the understanding that no Project related activities are expected to occur west of Nason Street, no impacts are expected to occur to this feature and no mitigation measures are recommended at this time. As such, the Project Site does not contain any riparian habitat or other sensitive natural communities that would need to be preserved. No impacts to sensitive natural communities are anticipated as a result of the Proposed Project.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  The Project Site does not contain any state or federally protected wetlands or Waters of the U.S (ECORP 2023b; ECORP 2019a). Therefore, the Proposed Project would not result in impacts to state or federally protected wetlands or Waters of the United States.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  The Project Site is located within and adjacent to areas containing existing disturbances (e.g., paved roads and residential, commercial, and industrial developments). The Project Site has been heavily disturbed and contains very little vegetative cover that would facilitate wildlife movement. No migratory wildlife corridors or native wildlife nursery sites were identified within the Project Site (ECORP 2023b; ECORP 2019a). No impacts to these resources are expected to occur during the development of the Project Site.</p>				
<p>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  Project implementation would not result in the removal of any trees. Landscape improvements associated with the Proposed Project would comply with the City of Moreno Valley Municipal Code Section 9.17.030</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
and 9.17.040 which set forth policies regarding heritage trees and street trees respectively. No impact would occur.				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b></p> <p>The Project Site is located within the study area for the MSHCP, but outside of any Cell Groups, Criteria Cells, and Subunit designations. Section 6.0 of the MSHCP requires assessment of the potential effects from the Proposed Project on biological resources including riparian/riverine areas, vernal pools, and fairy shrimp, burrowing owl, and Narrow Endemic Plant Species. In addition, the MSHCP requires an Urban/Wildlands Interface analysis be conducted in order to address the indirect effects associated with locating proposed development in proximity of MSHCP Conservation Areas. These resources were assessed during the reconnaissance survey and are discussed below in relation to the Proposed Project.</p> <p>The Proposed Project consists of construction of commercial buildings and associated parking lots, which is a covered activity under the MSHCP for areas outside of subunits or criteria cells. Because development of the Project Site is a covered activity within the MSHCP, it is an allowable use that has been contemplated within the MSHCP. However, projects that are covered still need to comply with MSHCP requirements.</p> <p><i>Riparian/Riverine, Vernal Pool, and Fairy Shrimp Habitat Assessment (MSHCP Section 6.1.2)</i></p> <p>In accordance with Section 6.1.2 of the MSHCP, a habitat assessment was performed for riparian and riverine communities, vernal pools, and fairy shrimp. No riparian/riverine, vernal pool, and fairy shrimp habitat were documented within the Project Site. The January 2023 survey included a buffer area of 500 feet beyond the property boundaries. Riparian vegetation associated with a drainage feature was documented within the 500-foot buffer; however, this area is outside of the limits of disturbance where impacts will occur for the Project (ECORP 2023b; ECORP 2019a). Therefore, impacts would occur and no mitigation measures are recommended.</p> <p><i>Narrow Endemic Plant Species (MSHCP Section 6.1.3)</i></p> <p>The RCA MSHCP Information Map was reviewed to determine whether the Project Site or staging areas are located within a Narrow Endemic Plant Species Survey Area (NEPSSA), in accordance with Section 6.1.3 of the MSHCP. The Project Site is not located within a NEPSSA or a Criteria Area. Further, all of the plant species identified in the literature review were determined to be presumed absent from the Project Site due to the high level of disturbance and lack of native vegetation communities (ECORP 2023b; ECORP 2019a).</p> <p><i>Burrowing Owl Habitat Assessment (MSHCP Section 6.3.2)</i></p> <p>In accordance with Section 6.3.2 of the MSHCP, a habitat assessment for burrowing owl was performed. Additionally, the RCA MSHCP Information Map was reviewed to identify areas within the Project Site that may fall within the designated burrowing owl survey areas. The entire Project Site is located within the burrowing owl survey area. Burrowing owls or suitably sized burrows were not identified on the Project Site during the burrowing owl habitat assessment that was performed in accordance with the MSHCP burrowing owl guidelines during the reconnaissance survey (ECORP 2023b; ECORP 2019a).</p> <p>Based on the results of the burrowing owl habitat assessment and focused burrow survey, focused burrowing owl surveys will not be required for the Proposed Project due to the lack of suitable habitat and presence of potential burrows; however, due to the mobile nature of burrowing owls, this species could be found using the site prior to the start of project construction activities. Therefore, a pre-construction survey for burrowing owls will need to be completed prior to construction activities in</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
accordance with the MSHCP burrowing owl survey guidelines. Implementation of Mitigation Measure BIO-2 would avoid impacts to burrowing owl and violations of the MSHCP requirements in Section 6.3.2.				
<i>Urban/Wildlands Interface Guidelines (MSHCP Section 6.1.4)</i>				
The requirements for Urban/Wildlands Interface for the management of edge factors do not apply to the Project Site or staging areas because the Project Site is not situated adjacent to any wildlands or MSHCP-designated Conservation Areas. The Project Site and staging areas are relatively isolated from larger, contiguous blocks of native habitat and completely surrounded by residential development, urban development, and other anthropogenic land use. A net long-term increase of edge impacts is not expected as a result of the Proposed Project.				
<i>Additional Surveys (MSHCP Section 6.3.2)</i>				
In accordance with Section 6.3.2, the Project Site was assessed for burrowing owl suitability and burrowing owl was determined to have a moderate potential to occur due to the presence of suitable potential burrows and recent occurrence data recorded in the vicinity of the Project Site. This species was listed as having a low potential to occur in the 2019 report. No burrowing owls were identified on the site during the January 2023 survey. Due to the presence of potential burrows, burrowing owl may move onto the site prior to Project construction, and focused burrowing owl surveys are recommended in accordance with the MSHCP burrowing owl survey guidelines. Direct impacts to burrowing owl may occur in the form of injury or mortality during ground-disturbing or vegetation removal activities, and indirect impacts may occur in the form of increased human and vehicular activity, noise, dust, and degradation of habitat in adjacent areas. These impacts may be considered significant under CEQA. In order to reduce these impacts to a less than significant level Mitigation Measure BIO-3 will be implemented.				
<b>Sources:</b>				
<ol style="list-style-type: none"> <li>1. Moreno Valley Municipal Code Section 9.17.030 G – Heritage Trees</li> <li>2. Moreno Valley Municipal code Section 9.17.040 – Street Trees</li> <li>3. Moreno Valley Municipal Code Chapter 8.60 – Threatened and Endangered Species</li> <li>4. ECORP Consulting, Inc. 2019a. Biological Technical Report and MSHCP Consistency Analysis. August 2019. (Appendix B)</li> <li>5. ECORP Consulting, Inc., 2023b. Biological Resource Assessment 2023 Update. (Appendix B)</li> </ol>				
<b>V. CULTURAL RESOURCES – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to <a href="#">§15064.5?</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b>				
A Cultural Resources Investigation Report was prepared by ECORP in 2019 (ECORP 2019b), and updated in 2023 (ECORP 2023c, Appendix C) for the Proposed Project to determine if cultural resources were present in or adjacent to the Project Area and assess the sensitivity of the Project Area for undiscovered or buried cultural resources.				
A cultural resources records search was conducted at the Eastern Information Center (EIC) at the University of California Riverside. The purpose of the records search was to determine the extent and location of previous surveys, previously identified prehistoric or historic archaeological site locations, architectural resources, historic properties, cultural landscapes, or ethnic resources within a one-mile radius of the Project Area. Materials reviewed included survey and evaluation reports, archaeological site records, historic maps, and the Historic Property Data File for Riverside County, which includes resources listed in or eligible for the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Points of Historical Interest, California Historical Landmarks, and National Historic Landmarks. Historic-period aerial photographs were also reviewed as a part of this study and were found online (ECORP 2019b; ECORP 2023c). The records search results indicated that the Project Area has not been previously surveyed for cultural resources. The records search also indicated that 28 cultural resources investigations have been conducted within a one-mile radius of the				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Project Area. A review of historic-period maps indicates that no historic-period roads or structures were located within the Project Area. The Historic Property Data File (HPDF) for the City of Moreno Valley and Riverside County did not show any historic-period resources listed within the one-mile records search radius. The HPDF shows no resources listed on the NRHP or CRHR, and there are no California Points of Historical Interest, California Historical Landmarks, or National Historic Landmarks within the Project Area or within the one-mile records search radius. The first of two intensive systematic pedestrian surveys of the 8.4-acre Project Area was conducted on July 24, 2019. This survey consisted of walking parallel north-south transects with 15-meter intervals between each transect across the entire Project Area. A second pedestrian survey was conducted on February 16, 2023. As a result of the survey, the archeologist determined that ground conditions were unchanged for 60 percent of the Project Area, and that visibility had improved in the central portion of the Project Area. No cultural resources were identified within the Project Area during either of the intensive pedestrian surveys. Although no cultural resources were identified in the Project Area as a result of the records search and field surveys, there always remains the potential for ground-disturbing activities to expose previously unrecorded cultural resources. If previously unrecorded historical resources are encountered during construction, implementation of mitigation measures developed during AB 52 Native American consultation would reduce impacts to a less than significant level (refer to Mitigation Measures CR-1 through CR-8, as listed in Section XVIII, <i>Tribal Cultural Resources</i>).</p>				
<p>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to <a href="#">§15064.5</a>?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> No archaeological resources have been previously recorded on the site and none were recorded during the field survey (ECORP 2019b, 2023c, Appendix C). However, there remains the possibility that the Proposed Project may impact unknown buried archaeological resources as a result of ground disturbing construction activities. With the implementation of Mitigation Measure CR-1 through CR-8 impacts would be less than significant.</p>				
<p>c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> No formal cemeteries are located in or near the Project Area. Most Native American human remains are found in prehistoric archaeological sites. No prehistoric archaeological sites have been recorded within the Project Area. No impacts to human remains are anticipated; however, if any are encountered during grading activities, impacts would be significant. Implementation of Mitigation Measure CR-1 through CR-8 would reduce potential impacts to a less than significant level.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. ECORP Consulting, Inc. 2019b. Cultural Resources Investigation for the MV Cactus 9 and Nason Project in the City of Moreno Valley. August 2019.</li> <li>2. ECORP Consulting, Inc. 2023c. Update to the 2019 Cultural Resources Investigation for the MV Cactus 9 Cactus and Nason Project. March 2023.</li> </ol>				
<p><b>VI. ENERGY – Would the project:</b></p>				
<p>a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> Energy relates directly to environmental quality. Energy use can adversely affect air quality and other natural resources. The vast majority of California’s air pollution is caused by burning fossil fuels.</p>				

**ISSUES & SUPPORTING INFORMATION SOURCES:**

Potentially Significant Impact

Less Than Significant with Mitigation Incorporated

Less Than Significant Impact

No Impact

Consumption of fossil fuels is linked to changes in global climate and depletion of stratospheric ozone. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes (auto, carpool, and public transit); vehicle speeds; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy. In addition, residential, commercial, and industrial land uses consume energy, typically through the usage of natural gas and electricity. This analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment fuel necessary for Project construction, and the automotive fuel necessary for Project operations.

Electricity use is measured in kilowatt-hours (kWh), and natural gas use is measured in therms. Vehicle fuel use is typically measured in gallons (e.g. of gasoline or diesel fuel), although energy use for electric vehicles is measured in kWh.

The electricity consumption associated with all nonresidential uses in Riverside County from 2017 to 2021 is shown in Table 9. As indicated, the demand has generally remained constant since 2017.

**Table 9. Nonresidential Electricity Consumption in Riverside County 2017-2021**

Year	Electricity Consumption (kilowatt hours)
2021	8,256,708,716
2020	8,014,699,265
2019	8,165,546,506
2018	8,248,461,330
2017	8,229,302,912

Source: CEC 2022

The natural gas consumption associated with all nonresidential uses in Riverside County from 2017 to 2021 is shown in Table 10. As indicated, the demand has increased since 2017.

**Table 10. Nonresidential Natural Gas Consumption in Riverside County 2017-2021**

Year	Natural Gas Consumption (therms)
2021	144,212,100
2020	134,823,268
2019	147,961,563
2018	139,190,917
2017	139,148,907

Source: CEC 2022

Automotive fuel consumption in Riverside County from 2018 to 2022 is shown in Table 11. Fuel consumption demand has generally remained constant since 2018.

**Table 11. Automotive Fuel Consumption in Riverside County 2017-2021**

Year	Total Fuel Consumption (gallons)
2022	985,911,604
2021	981,566,620
2020	884,735,666
2019	991,221,602
2018	984,672,006

Source: CARB 2022

The impact analysis focuses on the four sources of energy that are relevant to the Proposed Project: electricity, natural gas, the equipment-fuel necessary for Project construction, and the automotive fuel necessary for Project operations. Addressing energy impacts requires an agency to make a determination as to what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary

**ISSUES & SUPPORTING INFORMATION SOURCES:**

Potentially Significant Impact

Less Than Significant with Mitigation Incorporated

Less Than Significant Impact

No Impact

consumption of energy for a proposed land use project. For the purpose of this analysis, the amount of electricity estimated to be consumed by the Project is quantified and compared to that consumed by all nonresidential land uses in Riverside County. Similarly, the amount of fuel necessary for Project construction and the amount of fuel necessary for Project operations is calculated and compared to that consumed in Riverside County.

The analysis of electricity is based on CalEEMod modeling (Appendix A), which quantifies energy use for Project operations. The amount of operational automotive fuel use was estimated using the CARB’s EMFAC2021 computer program, which provides projections for typical daily fuel usage in Riverside County. The amount of total construction-related fuel use was estimated using ratios provided in the Climate Registry’s General Reporting Protocol for the Voluntary Reporting Program, Version 2.1. Energy consumption associated with the Proposed Project is summarized in Table 12.

**Table 12. Proposed Project Energy and Fuel Consumption**

Energy Type	Annual Energy Consumption	Percentage Increase Countywide
<i>Project Energy Consumption</i>		
Electricity Consumption <sup>1</sup>	1,901,379 kilowatt-hours	0.0460 percent
Natural Gas <sup>1</sup>	311 therms	0.0002 percent
<i>Automotive Fuel Consumption</i>		
Project Construction Year One <sup>2</sup>	40,493 gallons	0.0041 percent
Project Construction Year Two <sup>2</sup>	39,704 gallons	0.0040 percent
Project Operations <sup>3</sup>	495,513 gallons	0.0502 percent

*Source: <sup>1</sup>CalEEMod; <sup>2</sup>Climate Registry 2016; <sup>3</sup>EMFAC2021 (CARB 2022).*

*Notes: The Project increases in electricity and natural gas consumption are compared with all of the non-residential buildings in Riverside County in 2021, the latest data available. The Project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2022, the most recent full year of data.*

As shown in Table 12, the annual electricity consumption due to operations would be 1,901,379 kilowatt-hours, resulting in a negligible increase (0.0460 percent) in the typical annual electricity consumption attributable to all non-residential uses in Riverside County. This is potentially a conservative estimate since in September 2018 Governor Jerry Brown Signed Executive Order (EO) B-55-18, which established a new statewide goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” Carbon neutrality refers to achieving a net-zero carbon dioxide emissions. This can be achieved by reducing or eliminating carbon emissions, balancing carbon emissions with carbon removal, or a combination of the two. This goal is in addition to existing statewide targets for greenhouse gas (GHG) emission reduction. Governor’s Executive Order B-55-18 requires CARB to “work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.” Natural gas consumption due to operations would be 311 therms resulting in a negligible increase (0.0002 percent) in the typical annual natural gas consumption attributable to all nonresidential uses in Riverside County. For these reasons, the Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy.

Fuel necessary for Project construction would be required for the operation and maintenance of construction equipment and the transportation of materials to the Project Site. The fuel expenditure necessary to construct the physical building and infrastructure would be temporary, lasting only as long as Project construction. As further indicated in Table 12, the Project’s gasoline fuel consumption during the one-time construction period is estimated to be 40,493 gallons during the first year of construction and 39,704 gallons during the second year of construction. This would increase the annual fuel use in the county by 0.0041 percent and 0.0040 percent respectively. As such, Project construction would have a nominal effect on local and regional energy supplies. No unusual Project characteristics would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or the state. Construction contractors would purchase their own gasoline and diesel fuel from local suppliers and would judiciously use fuel supplies to minimize costs due to waste and subsequently maximize profits. Additionally, construction equipment fleet turnover and increasingly

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and requiring recycling of construction debris, would further reduce the amount of transportation fuel demand during Project construction. For these reasons, it is expected that construction fuel consumption associated with the Project would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature.</p> <p>The Project is estimated to generate approximately 5,752 daily trips (K2 Traffic Engineering, Inc. 2020). As indicated in Table 12, this would result in the consumption of approximately 495,513 gallons of automotive fuel per year, which would increase the annual countywide automotive fuel consumption by 0.0502 percent. Fuel consumption associated with the vehicle trips generated by the Project during operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.</p> <p>As such, a less than significant impact would occur.</p>				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b></p> <p>The Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The Project will be built to the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the CCR (Title 24). Title 24 was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. Title 24 is updated approximately every three years. The 2022 Title 24 updates went into effect on January 1, 2023. The 2022 Energy Standards improve upon the 2019 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. Buildings permitted on or after January 1, 2023, must comply with the 2022 Standards. Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments. Additionally, in January 2010, the State of California adopted the California Green Building Standards Code (CalGreen) that establishes mandatory green building standards for all buildings in California. The code was subsequently updated in 2013. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. With these building standards in place, the Project would not obstruct any state or local plan for renewable energy or energy efficiency.</p> <p>Furthermore, the Project would be required to comply with relevant energy conservation plans specific to Moreno Valley including the City’s Climate Action Plan as well as the General Plan. Specifically, General Plan policies LCC.4-5, S.3-2, S.3-6, and OSRC.3-1 through OSRC.3-8. An overarching goal of these policies is to encourage energy conservation activities and programs throughout the City. The Proposed Project would not conflict or obstruct any local or state plans for renewable energy or energy efficiency. A less than significant impact would occur.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. CARB (California Air Resources Board). 2022. EMFAC2021 Web Database Emissions Inventory. <a href="https://www.arb.ca.gov/emfac/2021/">https://www.arb.ca.gov/emfac/2021/</a>.</li> <li>2. California Air Pollution Control Officers Association (CAPCOA). 2022. California Emissions Estimator Model (CalEEMod), version 2022.1.</li> <li>3. Climate Registry. General Reporting Protocol for the Voluntary Program version 2.1. January 2016. Available at: <a href="http://www.theclimateregistry.org/wp-content/uploads/2014/11/General-Reporting-Protocol-Version-2.1.pdf">http://www.theclimateregistry.org/wp-content/uploads/2014/11/General-Reporting-Protocol-Version-2.1.pdf</a>. 2016.</li> <li>4. California Energy Commission (CEC). 2022. 2021 Total System Electric Generations in Gigawatt Hours. <a href="https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation">https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation</a>.</li> <li>5. ECORP 2023a. Air Quality and Greenhouse Gas Assessment for the Cactus Avenue and Nason Street Commercial Development Project. 2023 Update, (Appendix A).</li> <li>6. Moreno Valley, City of. 2021. City of Moreno Valley General Plan.</li> </ol>				



ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. K2 Traffic Engineering Inc. 2020. Focused Traffic Impact Study.				
<b>VII. GEOLOGY AND SOILS – Would the project:</b>				
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 <a href="https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf">https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  The Project Site is located on the Perris Block within the Peninsular Ranges Geomorphic Province. The Perris Block is bounded on the northeast by the San Jacinto Fault, on the north by the Cucamonga Fault and the San Gabriel Mountains, and to the southwest by the Elsinore Fault and the Santa Ana Mountains. The subject property is mapped as being underlain by alluvial fans of the Quaternary age. The subject property is located on the Perris Erosional Surface and Paloma Surface. The depositional surface is underlain by sediments of various thickness that have filled the Perris Groundwater basin. There are bedrock outcroppings located west of the subject property. The bedrock surface was defined by gravimetric survey and described as “complex bedrock scour surface morphology.”</p> <p>The San Jacinto fault passes through the eastern portion of the City. The San Jacinto fault is considered to be the most active fault in Southern California. An Alquist-Priolo Special Fault Zone has been established for the San Jacinto fault. The Casa Loma fault (a fault strand of the San Jacinto fault) lies 1.5 miles southwest of the San Jacinto fault in the southeast corner of the City. There are no known active or potentially active faults traversing the Project Site. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or an earthquake hazard zone, as depicted in the City of Moreno Valley 2040 General Plan Final EIR (Moreno Valley 2021). On this basis, the potential for the Proposed Project to expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault is considered less than significant.</p>				
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  The Project Site is located in a region known to be seismically active and strong seismic ground-shaking could be anticipated during an earthquake event of sufficient magnitude. The nearest known active fault is the San Jacinto fault, located approximately 3.5 miles northeast of the Project Site. This fault could generate an earthquake of a magnitude that could potentially damage improvements on the Project Site.</p> <p>The California Building Code requires construction methods that minimize the effects of earthquakes on structures. As part of the City’s standard review and approval of development projects, any new development must provide a geotechnical study for review and approval by the Building &amp; Safety Official; and comply with the requirements of the approved geotechnical report, and applicable provisions of the Uniform Building Code (UBC) and California Building Code (CBC). Compliance with these requirements would reduce potential impacts resulting from strong seismic ground-shaking to levels that are less than significant.</p>				
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  Liquefaction is a phenomenon where water-saturated granular soil loses shear strength during strong ground shaking produced by earthquakes. The loss of soil strength occurs when cyclic pore water pressure increases below the groundwater surface. Potential hazards due to liquefaction include the loss of bearing strength beneath structures, possibly causing foundation failure and/or significant settlements.</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
According to the Moreno Valley Hazard Mitigation Plan, the Project Site is not located on a potential liquefaction zone. Additionally, the Proposed Project would comply with the California Building Code and is not anticipated to directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic related ground failure including liquefaction. Impacts would be less than significant.				
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b> The Project Site and immediate vicinity are relatively flat and devoid of topographical features or terrain differentials. As such, the site is likely not susceptible to landslides. Additionally, the Proposed Project would not involve the cutting of any substantial slopes within or adjacent to the property. Therefore, the Proposed Project presents little potential for landslides and impacts would be less than significant.				
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b> Implementation of the Proposed Project would require ground-disturbing activities, such as grading, that could result in soil erosion or loss of topsoil. Construction of the Proposed Project would be required to comply with the Construction General Permit, either through a waiver or through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Best Management Practices (BMPs) are included as part of the Storm Water Pollution Prevention Plan (SWPPP) prepared for the Proposed Project and would be implemented to manage erosion and the loss of topsoil during construction-related activities. The Proposed Project's grading plan would also ensure that the proposed earthwork is designed to avoid soil erosion. Impacts as a result of soil erosion or the loss of topsoil would be less than significant.				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b> Please refer to the responses to Section 4.7 question a), above. The Proposed Project would comply with the California Building Code. Impacts related to an unstable geological unit or soil resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse would be less than significant.				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b> Expansive soils can shrink and swell with drying and wetting. The shrink-swell potential of expansive soils can result in differential movement beneath foundations. The three soil types found on the Project Site include Hanford fine sandy loam (HgA), Hanford coarse sandy loam (HcC), and Greenfield sandy loam, are all well-drained soils and are not considered expansive soils. A less than significant impact would occur.				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Response:</b>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
No septic tanks or other alternative wastewater disposal systems are proposed. As such, there is no potential for adverse impacts due to soils limitations relative to septic tanks or alternative wastewater disposal systems. No impact would occur.				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> As shown in Figure 4-7.4 of the City of Moreno Valley's 2040 General Plan FEIR, the Project Site is located in an area of "High" paleontological sensitivity. Therefore, the possibility to uncover unique paleontological resources or geological features during ground disturbing activities is potentially significant. Mitigation Measure GEO-1 below would reduce potential impacts to a less than significant level.</p> <p><b>GEO-1:</b> The developer shall ensure that any excavations below 4 feet in depth are closely monitored by a qualified paleontological monitor. Any specimens shall be collected by the monitor. Sediment samples shall be collected and processed to determine the small fossil potential in the Project Area. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Final Environmental Impact Report for the MoVal 2040: Moreno Valley Comprehensive Plan Update, Housing Element Update, and Climate Action Plan <ul style="list-style-type: none"> <li>• Section 4.7: Geology and Soils <ul style="list-style-type: none"> <li>- Figure 4.7-1: Fault Zone</li> <li>- Figure 4.7-2 Liquefaction</li> <li>- Figure 4.7-4 Paleontological Sensitivity</li> <li>- Figure 5.6-2 Seismic Hazards</li> </ul> </li> <li>• Section 5.10 – Cultural Resources <ul style="list-style-type: none"> <li>- Figure 5.10-3 Palaeontologic Resource Sensitivity Areas</li> </ul> </li> </ul> </li> <li>2. Moreno Valley 2040 General Plan, adopted June 15, 2021 <ul style="list-style-type: none"> <li>• Chapter 6 – Safety Element <ul style="list-style-type: none"> <li>- Map S-3: Landslide Hazards</li> </ul> </li> </ul> </li> <li>3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code</li> <li>4. Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations</li> <li>5. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, revised 2017, <a href="https://moval.gov/departments/fire/pdf/haz-mit-plan.pdf">https://moval.gov/departments/fire/pdf/haz-mit-plan.pdf</a> <ul style="list-style-type: none"> <li>• Chapter 4 – Earthquake <ul style="list-style-type: none"> <li>- Figure 4-1 – Right-Lateral Strike -Slip Fault</li> <li>- Figure 4-1.1 – Moreno Valley Geologic Faults and Liquefaction 2016</li> <li>- Figure 4-1.2 – Moreno Valley Area Ground Shaking Map</li> </ul> </li> <li>• Chapter 8 – Landslide <ul style="list-style-type: none"> <li>- Figure 8-1 – Moreno Valley Slope Analysis 2016</li> </ul> </li> </ul> </li> <li>6. Emergency Operations Plan, City of Moreno Valley, adopted September 1, 2019, <a href="https://moval.gov/departments/fire/pdf/MV-EOP-2019.pdf">https://moval.gov/departments/fire/pdf/MV-EOP-2019.pdf</a> <ul style="list-style-type: none"> <li>• Threat Assessment 1 – Major Earthquakes <ul style="list-style-type: none"> <li>- Figure 9 – Types of Faults</li> <li>- Figure 10 – Earthquake Faults</li> <li>- Figure 11 – Comparison of Richter Magnitude and Modified Mercalli Intensity</li> <li>- Figure 12 – Magnitude 4.5 or Greater Earthquake Map</li> <li>- Figure 13 – Geologic Faults and Liquefaction</li> </ul> </li> </ul> </li> <li>7. Partner Engineering and Science, Inc. Phase I Environmental Site Assessment Report 2019 (Appendix E)</li> </ol>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS – Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b></p> <p>The CEQA Guidelines Appendix G thresholds for Greenhouse Gases (GHGs) do not prescribe specific methodologies for performing an assessment, do not establish specific thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA. With respect to GHG emissions, the CEQA Guidelines Section 15064.4(a) states that lead agencies “shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's greenhouse gas emissions or rely on a “qualitative analysis or other performance-based standards.” (14 CCR 15064.4(b)). A lead agency may use a “model or methodology” to estimate GHG emissions and has the discretion to select the model or methodology it considers “most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change.” (14 CCR 15064.4(c)). Section 15064.4(b) provides that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment:</p> <ul style="list-style-type: none"> <li>▪ The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.</li> <li>▪ Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.</li> <li>▪ The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4(b)).</li> </ul> <p>In addition, Section 15064.7(c) of the CEQA Guidelines specifies that “[w]hen adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence” (14 CCR 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)). As a note, the CEQA Guidelines were amended in response to Senate Bill 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.</p> <p>Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions.” Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.</p> <p>The significance of the Proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Proposed Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

reduction or mitigation of GHG emissions. The City of Moreno Vallely's 2020 Climate Action Plan (CAP) is the most recent document demonstrating how the City will comply with the State's GHG emission reduction standards. The CAP is considered a qualified GHG reduction strategy that allows developments to tier from and streamline the GHG analysis under CEQA. The CAP includes a Project Review Checklist for streamlined review of GHG emissions for projects that demonstrate consistency with the CAP. Therefore, if projects comply with the CAP, this demonstrates project compliance with State GHG reduction goals for 2030 and for the years beyond 2030. Projects in compliance with the CAP would have a less than significant impact.

**Project Construction**

Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Project Site, and off-road construction equipment (e.g., dozers, loaders, excavators). Table 13 illustrates the specific construction generated GHG emissions that would result from construction of the Project. Once construction is complete, the generation of these GHG emissions would cease.

**Table 13. Construction-Related Greenhouse Gas Emissions**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e (Metric Tons/ Year)</b>
Construction Year One	411
Construction Year two	403
<b>Total Construction Emissions</b>	<b>814</b>

Source: ECORP 2023a, CalEEMod version 2022.1. Refer to Appendix A, Attachment A for Model Data Outputs.

Notes: Project construction generated GHG emissions were calculated using CalEEMod model defaults for Riverside County and information provided by the Project proponent.

As shown in Table 13, Project construction would result in the generation of approximately 814 metric tons of CO<sub>2</sub>e over the course of construction. Once construction is complete, the generation of these GHG emissions would cease. Consistent with SCAQMD recommendations, Project construction GHG emissions have been amortized of the expected life of the Project, which is considered to be 30 years per the SCAQMD. The amortized construction emissions are added to the annual average operational emissions (see Table 14).

**Project Operations**

Operation of the Project would result in an increase in GHG emissions primarily associated with mobile sources. Long-term operational GHG emissions attributed to the Project are identified in Table 14.

**Table 14. Operational-Related Greenhouse Gas Emissions**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e (Metric Tons/ Year)</b>
Construction Emissions (amortized over the 30-year life of the Project)	27
Area Source	2
Energy	559
Mobile	4,019
Waste	287
Water	35
<b>Total</b>	<b>4,929</b>

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Source: ECORP 2023a, CalEEMod version 2022.1. Refer to Appendix A, Attachment A for Model Data Outputs. Notes: Emission projections predominately based on CalEEMod model defaults for Riverside County and Project Site plans. Average daily vehicle trips provided K2 Traffic Engineering, Inc. (2020).</p> <p>As shown in Table 14, operations of the Project would result in 4,929 metric tons of CO<sub>2e</sub> annually. A large majority of these emissions would be generated by mobile sources, which is an emission source that cannot be regulated by the City. Additionally, GHG emissions are global pollutants. They can be carried miles away from the original source and have long atmospheric lifetimes compared to local pollutants. GHG emissions do not directly pose a threat to human health but can have numerous indirect effects. As previously stated, GHG emissions have been directly correlated to climate change. This can lead to events such as droughts, heat waves, increased intensity in storm events and rising sea levels. These can result in decreased precipitation, increased wildfires, saltwater infiltration of groundwater tables and decreased crop yields. A reduction of vehicle trips to and from the Proposed Project Site would reduce the amounts of mobile emissions. Methods of reducing vehicle trips include carpooling, transit, cycling, and pedestrian connections. However, this Project is proposing a commercial/retail development consisting of three mixed use medical/ office buildings, two drive-thru food service buildings, one retail/ restaurant building, and one convenience store building associated with a gasoline station with 12 fueling positions. The reduction of vehicle trips is only feasible for the employees working in the facilities; however, the majority of traffic trips instigated by the Project would be related to long-distance traveler and hauling trips.</p> <p>The State of California has implemented numerous strategies pertaining to automobiles and trucks and the reduction of emissions that directly apply to the Project. Urban goods delivery is an essential component of the greater freight system and vital to the urban economy. While urban goods delivery represents a small share of urban traffic, it generates a disproportionate amount of GHG emissions. The State of California promulgates policies designed and implemented to improve the efficiency and environmental footprint of the urban freight system, including the introduction of zero and near-zero emission vehicles - a strategy embedded in the Governor’s Sustainable Freight Action Plan as well as CARB’s Assembly Bill (AB) 32 Scoping Plan and Mobile Source Strategy.</p> <p>As described in Section VIIb, below, the Project would be consistent with the City’s CAP and a less than significant impact would occur.</p>				
<p>b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The significance of the Proposed Project’s GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Proposed Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Specifically, the Proposed Project is assessed for consistency with regulations or requirements adopted by the City’s 2020 CAP.</p> <p><b><u>Consistency with Moreno Valley Climate Action Plan (CAP)</u></b> The City of Moreno Valley’s CAP is the most recent document demonstrating how the City will comply with the state of California’s GHG emission reduction standards. The CAP addresses the SB 32 target of reducing GHG emissions 40 percent below 1990 levels by 2030 and EO S-3-05 target of reducing GHG emissions 80 percent below 1990 levels by 2050. The GHG emission targets established in the CAP are based on the goals established by EO S-3-05 and SB 32, consistent with the CAP guidelines established in the 2017 Scoping Plan. The CAP includes GHG reduction measures intended to close the emissions gap designed to reduce emissions in the transportation, industrial, residential, commercial, off-road equipment, public services and public lighting, and natural resources sectors.</p> <p>As previously described, the Project is proposing the construction of a commercial/retail development consisting of three mixed use medical/ office buildings, two drive-thru food service buildings, one retail/ restaurant building, and one convenience store building associated with a gasoline station with 12 fueling positions. The Project Site has a General Plan land use designation of DC which is a mixed use</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

designation allowing for a mix of business, restaurant, hotel, civic, cultural, and entertainment uses that integrate existing uses including the Riverside University Health System Medical Center, located just west of the Project Site. As the Project Site is consistent with the General Plan the Project is consistent with the GHG inventory set forth by the City. Additionally, the Project would be required to show consistency with the CAP Project Review Checklist which is intended to streamline the review of GHG emissions and demonstrate consistency with the CAP. All development in the City, including the Project, is required to adhere to all City-adopted policy provisions, including those contained in the adopted CAP and CAP Project Review Checklist. The Project applicant must complete a checklist to confirm consistency with the CAP to the satisfaction of City staff. The City ensures all provisions of the CAP are incorporated into projects and their permits through development review and applications of conditions of approval as applicable. As such, the Project would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

The Proposed Project would not conflict with an adopted plan, policy, or regulation pertaining to GHGs. Therefore, this impact would be less than significant. No mitigation is required.

**Sources:**

1. Moreno Valley 2040 General Plan, adopted June 15, 2021
2. ECORP Consulting, Inc., 2023a. Cactus & Nason Emissions Assessment 2023 Update.

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

**Response:**

The construction phase of the Proposed Project may include the transport, storage, and short-term use of petroleum-based fuels, lubricants, pesticides, and other similar materials. The transport of hazardous materials by truck is regulated by federal safety standards under the authority of the U.S. Department of Transportation. Additionally, the implementation of BMPs stipulating proper storage of hazardous materials and vehicle refueling would be implemented during construction as part of the Stormwater Pollution Prevention Plan (SWPPP). All transport, handling, use, and disposal of substances such as petroleum products, paints, and solvents related to the operation and maintenance of the Proposed Project would comply with all federal, state, and local laws regulating management and use of hazardous materials. Therefore, the use of such material would not create a significant hazard to the public and impacts would be less than significant.

The operation phase of the Proposed Project would involve the operation of two underground storage tanks and six fuel dispensers. The Riverside County Department of Environmental Health, as the Certified United Programs Agency (CUPA), would review the project to ensure the fuel dispensing system is designed in accordance with Federal and State Water Resource Control Board (SWRCB) standards for leak detection. The transport of fuel and tank filling operations would be conducted in compliance with applicable regulatory requirements. Other potentially hazardous materials associated with the fuel service or medical office use could be used and stored at the Project Site in accordance with regulatory requirements. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine use, transport, or disposal of hazardous materials, or from accidents involving the release of hazardous materials. Impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

**Response:**

The Proposed Project would develop a convenience store with fuel service, commercial office buildings, and restaurants on existing vacant land. Operation of the fuel system and medical office uses could include use and storage of small amounts of hazardous materials, which would be conducted in

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>compliance with applicable federal, state, and local regulatory requirements. As part of the Phase I Environmental Site Assessment (ESA) prepared by Partner Engineering and Science, Inc. (Partner 2019) identified known Recognized Environmental Conditions (REC), Controlled Recognized Environmental Conditions (CREC), and Historical Recognized Environmental Conditions (HREC). As part of their Phase I ESA, Partner did not identify any RECs, CRECs, or HRECs. Additionally, the Project Site was historically used for agricultural purposes, from as early as 1938 until approximately 1989. However, no specific areas of concern for agricultural chemicals have been identified within the Phase I ESA. Therefore, release of hazardous materials during the construction phase is not anticipated.</p> <p>During construction some hazardous materials, such as diesel fuel, would be used. A SWPPP, listing BMPs to prevent construction pollutants and products from violating any water quality standard or waste discharge requirements would be prepared for the Proposed Project. The potential risk associated with accidental discharge during use and storage of equipment-related hazardous materials would be low since the handling of such materials would be addressed through the implementation of BMPs. With the implementation of BMPs and compliance with existing regulations, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous material. Impacts would be less than significant.</p>				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b> There are no schools located within a one-quarter mile radius of the Project Site. The closest schools to the Project Site are Valley Christian Academy and La Jolla Elementary School, each located approximately 0.5 mile from the Project Site. No impact would occur.</p>				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to <a href="#">Government Code section 65962.5</a> and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b> A review of the Department of Toxic Substances Control's Hazardous Waste and Substances List (Cortese List) indicated that the Project Site is not located on any identified hazardous materials sites. Additionally, a review of the State Water Resources Control Board's Leaking Underground Storage Tank (LUST) GeoTracker database and the Environmental Protection Agency's (EPA) EnviroMapper indicated that there are no listed hazardous material sites within the project vicinity (DTSC 2023; SWRCB 2023; EPA 2023). No impact would occur.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b> A joint civilian and military airport (March Air Reserve Base) is located at the southwestern boundary of the City approximately 3.75 miles southeast of the Project Site. According to City of Moreno Valley General Plan FEIR, the Project Site is not located within an Accident Potential Zone (i.e., high risk areas 3,000 feet from each end of the runway). Thus, implementation of the Proposed Project would not result in a safety hazard for people living or working in the Project area. No impact would occur.</p>				



<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  The Proposed Project would not impair or physically interfere with an adopted emergency response or evacuation plan. The Proposed Project would include the construction of a retail/commercial center on the northeast corner of Cactus Avenue and Nason Street. Four entry/exit driveways for the proposed development would be provided along Cactus Avenue (2), Nason Street (1), and along the private street (1) abutting the northern project boundary. Traffic lanes may need to be temporarily closed during construction of improvements along Cactus Avenue and Nason Street. A traffic control plan would be implemented to maintain traffic flow and emergency response access in the Project area. Operation of the Proposed Project would be limited to the Project Site and would not include permanently blocking any roadways. Additionally, the Project Site does not contain any emergency facilities nor does it serve as an emergency evacuation route (Moreno Valley 2021). A less than significant impact would occur.</p>				
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  The Project Site is not located within a fire hazard area as identified in the City of Moreno Valley General Plan FEIR (Moreno Valley 2021; Map S-5). The site is surrounded by urban development and is not in the vicinity of any large natural areas. Implementation of the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas, or where residences are intermixed with wildlands. No impact would occur.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Moreno Valley 2040 General Plan, adopted June 15, 2021 <ul style="list-style-type: none"> <li>• Chapter 6 – Safety Element <ul style="list-style-type: none"> <li>- Map S-5 – Fire Hazard Severity Zones</li> <li>- Map S-6 – Emergency Evacuation Risk Assessment</li> <li>- Map S-7 – Airport Land Use Compatibility Zones</li> </ul> </li> </ul> </li> <li>2. March Air Reserve Base (MARB)/March Inland Port (MIP) Airport Land Use Compatibility Plan (ALUCP) on November 13, 2014, (<a href="http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700">http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700</a>)</li> <li>3. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, amended 2017, <a href="http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf">http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf</a></li> <li>4. Emergency Operations Plan, City of Moreno Valley, adopted September 1, 2019, <a href="http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf">http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf</a> <ul style="list-style-type: none"> <li>• Hazard Mitigation and Hazard Analysis</li> <li>• Threat Assessment 2 – Hazardous Materials</li> <li>• Threat Assessment 3 – Wildfire</li> <li>• Threat Assessment 6 – Transportation Emergencies <ul style="list-style-type: none"> <li>- Figure 17 – Air Crash Hazards</li> </ul> </li> </ul> </li> <li>5. Department of Toxic Substances Control <ul style="list-style-type: none"> <li>• Hazardous Waste and Substances List (Cortese List). Available at <a href="https://www.envirostor.dtsc.ca.gov/public/">https://www.envirostor.dtsc.ca.gov/public/</a>. Accessed on January 4, 2023.</li> </ul> </li> <li>6. Environmental Protection Agency. 2019. EnviroMapper database. Available at <a href="https://enviro.epa.gov/enviro/em4ef.home">https://enviro.epa.gov/enviro/em4ef.home</a>. Accessed on January 4, 2023.</li> <li>7. State Water Resources Control Board. 2023. GeoTracker database. Available at <a href="https://geotracker.waterboards.ca.gov/map/?CMD=runreport&amp;myaddress=Search+GeoTracker#">https://geotracker.waterboards.ca.gov/map/?CMD=runreport&amp;myaddress=Search+GeoTracker#</a>. Accessed on January 4, 2023.</li> <li>8. Partner Engineering and Science, Inc. Phase I Environmental Site Assessment Report 2019 (Appendix E)</li> </ol>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  Potential water quality impacts associated with the Proposed Project include short-term construction-related erosion/sedimentation and construction-related hazardous material discharge. Because the area of ground disturbance affected by the construction of the Proposed Project would exceed one acre, the Proposed Project would be subject to the requirements of the statewide National Pollutant Discharge Elimination System (NPDES) stormwater permit for construction activity (Order 98-08 DWQ), and as such would prepare a SWPPP. Impacts associated with construction-related water quality impacts would be avoided or reduced to a level below significance through implementation of standard construction BMPs and conformance with the NPDES requirements. During operations the Proposed Project would implement a Water Quality Management Plan (WQMP). The WQMP details the Proposed Project's stormwater management system to address post-construction runoff quality and quantity. The Proposed Project would also include three water retention areas, two located between office buildings 1 and 2, and one located between office building 3 and Cactus Avenue to retain stormwater runoff. The Proposed Project would also connect to an existing storm drain located at the southwest corner of the Project Site. Impacts would be less than significant.</p>				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  The Proposed Project would introduce impervious (hardscape) surfaces to a previously undeveloped vacant lot. The Proposed Project would not involve the withdrawal of groundwater. The Proposed Project's stormwater management system includes the use of three water retention areas, which would allow for groundwater recharge. Therefore, the Proposed Project is not anticipated to substantially affect groundwater recharge. Impacts would be less than significant</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  The Proposed Project would be subject to City review and approval which would ensure that the proposed grading plan and stormwater management system meet City development standards. As such, implementation of an approved grading plan is not anticipated to result in the substantial alteration of existing drainage patterns in a manner that could result in substantial erosion or siltation on- or off-site. Furthermore, the site is relatively flat and there are no streams or rivers on the Project Site that would be affected. Impacts would be less than significant.</p>				
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  As previously mentioned, the Proposed Project's stormwater management system would manage surface runoff originating from the Project Site. The Proposed Project's stormwater management system includes the use of three new water retention areas and the existing stormwater system. Surface runoff would be primarily conveyed to these facilities via surface flows. Water retention facilities are designed to allow stormwater to infiltrate into the ground reducing the velocity and volume of stormwater that is</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
discharged from the Project Site. As such, the potential for flooding on- or offsite is reduced. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b> A registered civil engineer designed the Proposed Project's stormwater management system to ensure that the system's components are sized to handle the runoff volumes that are anticipated for the post-development condition. The stormwater management system includes three water retention areas and an existing storm drain located at the southwest corner of the Project Site. The three retention areas would capture run off onsite and the existing storm drain would connect to the City storm drain within the public right-of-way. Impacts would be less than significant.				
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Response:</b> The proposed grading plan and stormwater management system are designed to prevent flooding conditions. Runoff and flood volumes that exceed the Proposed Project's stormwater management system capacity would be allowed to enter the City's existing storm drain system at the southeast corner of the Project Site to prevent flooding conditions. Impacts would be less than significant.				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Response:</b> According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the Project Site (Map No. 06065C0765G), the Project area is designated by FEMA as Zone X: other areas. Zone X: other areas are defined as areas determined to be outside the 0.2 percent annual chance floodplain (FEMA 2008). Additionally, the Project Site is located approximately 43 miles northeast of the Pacific Ocean and 3.3 miles north of the Perris Reservoir. Due to the distance from the Pacific Ocean and Perris Reservoir, the Project Site would not be subject to inundation from seiches or tsunamis. No impact would occur.				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Response:</b> The Proposed Project would comply with the City of Moreno Valley Municipal Code (8.21.170) general requirements for the statewide National Pollutant Discharge Elimination System (NPDES) stormwater permit for construction activity (Order 98-08 DWQ), and as such would prepare a SWPPP. Construction and operation of the Proposed Project would not interfere with any groundwater management or recharge plan. Additionally, the Proposed Project would include onsite water retention areas that would assist with groundwater infiltration. No impact would occur.				
<b>Sources:</b>  1. Moreno Valley Municipal Code Chapter 8.10 – Stormwater/Urban Runoff Management and Discharge Controls 2. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code • Section 9.10.080 – Liquid and Solid Waste 3. Moreno Valley Municipal Code Chapter 8.12 – Flood Damage Prevention 4. Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations 5. Eastern Municipal Water District (EMWD) 2020 Urban Water Management Plan 6. Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map Panel 765 of 385. Map Number 06065C0765G. Effective Date August 28, 2008. 7. Moreno Valley 2040 General Plan, adopted June 15, 2021				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

- Chapter 6 – Safety Element
  - Map S-4: Flood Hazard Areas

**XI. LAND USE AND PLANNING – Would the project:**

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

**Response:**  
 The Proposed Project would construct a commercial office and retail development on an approximately 8.4 acre/362,400-sf lot at the northeast corner of Cactus Avenue and Nason Street in the City of Moreno Valley. The Project Site is characterized as an 8.4-acre unimproved disturbed vacant lot with a DC (Downtown Center) land use designation. The vicinity of the Project Site is characterized by undeveloped land designated as DC land use to the north, residential development designated as a Residential (R2) land use to the south and east, and medical offices and the Riverside University Health System Medical Center designated as a DC land use to the west. The Proposed Project would provide medical office, commercial office, retail/fuel, and food service facilities on a currently unimproved vacant lot located an area identified by the City for mixed-use development.

Because the Proposed Project would be wholly located within an undeveloped lot, it would not cause a separation of uses or disruption of access between land uses around the site. All development associated with the Proposed Project would be confined to the Project Site and would not disrupt or divide the physical arrangement of the established community. The presence of a new commercial development would not physically hinder mobility within the community, nor disrupt the continuing operation of any surrounding land uses. Therefore, no impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

**Response:**  
 Development in the City of Moreno Valley is guided by the City’s General Plan, which is intended to guide local land use decisions and development patterns. The Proposed Project would provide commercial, retail, and food service facilities to an area of the City lacking such facilities. The nearest commercial development offering similar facilities is located approximately one mile east of the Project Site. Development of the Proposed Project would help meet the City’s land use plan goals by providing walking distance amenities to the residential and office developments in the vicinity of the Project Site. The Project would be consistent with the site’s DC General Plan and zoning designations. DC is a mixed use designation allowing for a mix of businesses, restaurant, hotel, civic, cultural, and entertainment uses that integrate existing uses including the Riverside University Health System Medical Center, located just west of the Project Site on the west side of Nason Street.

As described in Section IV. Biological Resources, response f), the Project would be consistent with the Western Riverside County MSHCP. Therefore, the Proposed Project would be consistent with the applicable land use plans, policies, and regulations. Impacts would be less than significant.

**Sources:**

1. Moreno Valley 2040 General Plan, adopted June 15, 2021
  - Chapter 2 – Land Use & Community Character
    - Map LLC-4: General Plan Land Use
2. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--	--------------------------	--------------------------	--------------------------	-------------------------------------

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Response:</b>            The mineral resources known to be located within the City are common materials: sand, gravel, and rock. There is only one active sand and gravel quarry on record within the City: the Jack Rabbit Canyon Quarry, which became inactive in 2001. It is in a drainage course located at the northeast corner of Jack Rabbit Trail and Gilman Springs Road, adjacent to the Quail Ranch Golf Course. Overall, the extent of mineral deposits in the City is very limited. According to the City of Moreno Valley General Plan EIR, no regional or statewide significant mineral resources are located within the city. Due to the size of the Project Site (8.4 acres) and lack of a regionally or statewide significant mineral resources within the City as identified in the General Plan EIR, construction of the Proposed Project would not preclude a significant area from being mined. Implementation of the Proposed Project would not result in the loss of availability of a significant mineral resource, and no impact to mineral resources would occur.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>            The Proposed Project would not be located within or near a mineral resource recovery site. Furthermore, no mining activities are proposed as part of the Proposed Project. Due to the size of the Project Site (8.4 acres) and lack of significant mineral resources within the City as identified in the General Plan EIR, implementation of the Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site, and no impact would occur.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Moreno Valley 2040 General Plan, adopted June 15, 2021               <ul style="list-style-type: none"> <li>• Final Environmental Impact Report – Section 4.12 – Mineral Resources                   <ul style="list-style-type: none"> <li>- Figure 4.12-1 – Mineral Resource Zones</li> </ul> </li> </ul> </li> <li>2. Moreno Valley Municipal Code               <ul style="list-style-type: none"> <li>• Section 8.21.020 A 7 – Permits Required</li> <li>• Title 9 – Planning and Zoning of the Moreno Valley Municipal Code                   <ul style="list-style-type: none"> <li>- Section 9.02.120 – Surface Mining Permits</li> </ul> </li> </ul> </li> <li>3. The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, Sections 2710-2796), <a href="https://www.conservation.ca.gov/dmr/lawsandregulations">https://www.conservation.ca.gov/dmr/lawsandregulations</a></li> </ol>				
<p><b>XIII. NOISE – Would the project result in:</b></p>				
<p>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?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>            The Project's noise analysis (ECORP 2023d) is provided in Appendix D and summarized in this section. There are a variety of noise descriptors that occur in this analysis. One of the most frequently used noise metrics is the equivalent noise level (<math>L_{eq}</math>); it considers both duration and sound power level. <math>L_{eq}</math> is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. Typically, <math>L_{eq}</math> is summed over a one-hour period. <math>L_{max}</math> is the highest root mean squared (RMS) sound pressure level with the sampling period, and <math>L_{min}</math> is the lowest RMS sound pressure level within the measuring period.</p> <p>The A-Weighted Sound Level, or dBA is the sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.</p> <p>Community Noise Equivalent Level (CNEL) is a 24-hour average Leq with a 5-dBA weighting during the hours of 7:00 pm to 10:00 pm and a 10-dBA weighting added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.</p> <p>Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured during a Day-Night Average Level (L<sub>dn</sub>), which is the 25-hour average noise level with a 10 dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours.</p> <p><i>Construction</i></p> <p><b><u>Off-site Construction Traffic Noise Impacts</u></b></p> <p>Project construction would result in additional traffic on adjacent roadways over the period that construction occurs. According to the California Emissions Estimator Model (CalEEMod), which is designed to model emissions for land use development projects based on typical construction requirements and generates construction assumptions, including construction equipment duration and the number of construction-related automotive trips, the maximum number of Project construction trips traveling to and from the Project Site during a single construction phase would not be expected to exceed 75 daily trips in total (61 construction worker trips and 14 vendor trips). According to Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol (2013), a doubling of traffic on a roadway is required to result in an increase of 3 dB (outside of the laboratory, a 3-dBA change is considered a just-perceivable difference). The Project Site is accessible from Cactus Avenue and Nason Street. According to the Focused Traffic Impact Study (K2 Traffic Engineering, Inc. 2020), the segment of Cactus Avenue between Lynn Lee Lane and Moreno Beach Drive currently accommodates 3,379 average daily trips. The segment of Nason Street between Hospital Road and Cactus Avenue currently accommodates 5,382 average daily trips. Thus, Project construction would not result in a doubling of traffic, and therefore its contribution to existing traffic noise would not be perceptible. Additionally, it is noted that construction is temporary, and these trips would cease upon completion of the Project.</p> <p>Therefore, this impact would be less than significant and no mitigation is required.</p> <p><b><u>Onsite Construction Noise Impacts</u></b></p> <p>Construction noise associated with the Proposed Project would be temporary and would vary depending on the specific nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., site preparation, excavation, paving). Noise generated by construction equipment, including earth movers, pile drivers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).</p> <p>During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site. The nearest noise-sensitive land uses that would be impacted by onsite activities consist of single-family residences located adjacent to the eastern site boundary. The nearest noise-sensitive land uses that would be impacted by offsite construction improvements (widening Cactus Avenue and installing a traffic signal at the intersection of Cactus and Lynn Lee Lane) consist of a single-family residential neighborhood approximately 35 feet south of the Project Site across Cactus Avenue.</p> <p>Chapter 11.80 of the City of Moreno Valley Municipal Code prohibits construction between the hours of 8:00 p.m. and 7:00 a.m. but does not promulgate a numeric threshold pertaining to the noise associated with construction. This is because construction noise is temporary, short term, intermittent in nature, and</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

would cease on completion of the Project. Furthermore, the City of Moreno Valley is a developing urban community and construction noise is generally accepted as a reality within the urban environment.

Construction would occur throughout the Project Site and would not be concentrated at one point. However, to estimate the worst-case onsite construction noise levels that may occur at the nearest noise-sensitive receptors and to evaluate the potential health-related effects (physical damage to the ear) from construction noise, the construction equipment noise levels were calculated using the Federal Highway Administration’s Roadway Noise Construction Model and compared against the construction-related noise level threshold established in the Criteria for a Recommended Standard: Occupational Noise Exposure prepared in 1998 by NIOSH. A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The NIOSH construction related noise level threshold starts at 85 dBA for more than 8 hours per day; for every 3-dBA increase, the exposure time is cut in half. This reduction results in noise level thresholds of 88 dBA for more than 4 hours per day, 92 dBA for more than 1 hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of this analysis, the lowest, more conservative threshold of 85 dBA  $L_{eq}$  is used as an acceptable threshold for construction noise at the nearby sensitive receptors.

The anticipated short-term construction noise levels are presented in Table 15.

**Table 15. Construction Average (dBA) Noise Levels at Nearest Receptors**

<b>Construction Phase</b>	<b>Estimated Exterior Construction Noise Level @ Closest Noise Sensitive Receptor (dBA <math>L_{eq}</math>)</b>	<b>Construction Noise Standard (dBA <math>L_{eq}</math>)</b>	<b>Exceeds Standards?</b>
<b>Onsite Construction</b>			
Phase 1 & 2 Site Preparation	72.1	85	No
Phase 1 & 2 Grading	71.7	85	No
Phase 1 Building Construction, Paving & Architectural Coating	73.6	85	No
Phase 2 Building Construction, Paving & Architectural Coating	73.6	85	No
<b>Offsite Construction</b>			
Phase 3 Site Preparation	85.1	85	Yes
Phase 3 Grading	84.1	85	No
Phase 3 Building Construction, Paving & Architectural Coating	86.6	85	Yes

Source: ECORP 2023d. Construction noise levels were calculated by ECORP Consulting using the FHWA Roadway Noise Construction Model (FHWA 2006). Refer to Appendix D, Attachment C for Model Data Outputs.

Notes: Construction equipment used during construction provided using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions for land use development projects, based on typical construction requirements. CalEEMod creates the construction assumptions, including construction equipment and duration, used in this analysis. Consistent with Federal Transit Administration (FTA) recommendations for calculating construction noise, construction noise was measured from the center of the Project Site (FTA 2018), which is approximately 300 feet from onsite construction and approximately 35 feet from offsite construction from the nearest receptor.

$L_{eq}$  = The equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the  $L_{eq}$  of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

As shown in Table 15, onsite construction activities would not exceed the NIOSH noise threshold of 85 dBA at the nearest sensitive receptors located east of the Project Site. However, offsite construction activities along Cactus Avenue would exceed the NIOSH noise threshold of 85 dBA at the residences south of the Project Site across Cactus Avenue. In order to reduce offsite Project construction noise experienced at the nearby residences it is recommended that the implementation of temporary noise barriers be used during offsite Project construction. Noise barriers or enclosures can provide a sound reduction of 35 dBA or greater (WEAL 2000). To be effective, a noise enclosure/barrier must physically fit in the available space, must completely break the line of sight between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend lengthwise and vertically as far as feasibly possible to be most effective. The limiting factor for a noise barrier is not the component of noise transmitted through the material, but rather the amount of noise flanking around and over the barrier. In the case of offsite Project construction, an enclosure/barrier would only be necessary along the southern side of Cactus Avenue adjacent to the impacted residences. Mitigation Measure NOI-1 would be implemented for those construction activities.

**NOI-1:** The Project improvement and building plans will include the following requirements for construction activities along the south side of Cactus Avenue adjacent to the residential uses:

- Construction contracts must specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices.
- A sign, legible at a distance of 50 feet, shall be posted at the offsite Project construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator.
- As applicable, all equipment shall be shut off when not in use.
- Equipment staging shall be located in areas that create the greatest distance between construction-related noise/vibration sources and sensitive receptors surrounding offsite construction.
- During offsite construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receptors nearest the Project Site.
- Jackhammers, pneumatic equipment, and all other portable stationary noise sources will be directed away from residential receptors. Either one-inch plywood or sound blankets can be utilized for this purpose. They should reach up from the ground and block the line of sight between equipment and the nearest off-site residences. The shielding should be without holes and cracks.
- Per Chapter 11.80 of the City of Moreno Valley Municipal Code, construction is prohibited between the hours of 8:00 p.m. and 7:00 a.m.

Implementation of Mitigation Measure NOI-1 would substantially reduce offsite construction-generated noise levels. As previously described, noise barriers or enclosures such as that required in Mitigation



<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Measure NOI-1 can provide a sound reduction 35 dBA or greater (WEAL 2000), which would be a reduction robust enough to maintain construction noise levels less than the applicable standard. Temporary noise barriers can consist of a solid plywood fence and/or flexible sound curtains, such as an 18-ounce tarp or a 2-inch-thick fiberglass blanket attached to chain link fencing. Project construction activities would not expose persons to and generate noise levels in excess of City standards with implementation of NOI-1.

*Operational Noise*

**Offsite Operational Traffic Noise Impacts**

Future traffic noise levels throughout the Project vicinity (i.e., vicinity roadway segments that traverse noise-sensitive land uses) for the Proposed Project were modeled based on the traffic volumes identified by K2 Traffic Engineering, Inc. (2020) to determine the noise levels along Project vicinity roadways. Table 16 shows the calculated offsite roadway noise levels under existing traffic levels compared to future build-out of the Project. As shown in Table 16, the noise levels at all of the roadway segments that traverse noise-sensitive land uses would be below the normally acceptable level of 65 dBA Community Noise Equivalent Level (CNEL). Therefore, the potential significance of the change in noise levels was evaluated using the Federal Interagency Committee on Noise (FICON) thresholds of significance. The 2000 FICON findings provide guidance as to the significance of changes in ambient noise levels due to transportation noise sources. FICON recommendations are based on studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. FICON's measure of substantial increase for transportation noise exposure is as follows:

- If the existing ambient noise levels at existing and future noise-sensitive land uses (e.g. residential, etc.) are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or
- If the existing noise levels range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or
- If the existing noise levels already exceed 65 dBA CNEL, and the Project creates a community noise level increase of greater than 1.5 dBA CNEL.

**Table 16. Existing Plus Project Conditions - Predicted Traffic Noise Levels**

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway		Noise Standard (dBA CNEL)	Exceed Standard?
		Existing Conditions	Existing + Project Conditions		
<b>Alessandro Boulevard</b>					
East of Nason Street	Residential & Commercial	57.5	57.6	>5	No
West of Nason Street	Residential & Commercial	57.1	57.3	>5	No
<b>Hospital Road</b>					
West of Nason Street	Commercial	49.1	50	>5	No
<b>Cactus Avenue</b>					

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
West of Lasselle Street	Residential	56.3	56.5	>5	No	
Between Lasselle Street and Nason Street	Commercial	54.5	57.1	>5	No	
Between Nason Street and Lynn Lee Lane	Residential	55.4	56.1	>5	No	
Between Lynn Lee Lane and Moreno Beach Drive	Residential & Commercial	55.4	55.9	>5	No	
East of Moreno Beach Drive	Residential	54.2	54.5	>5	No	
<b>Iris Avenue</b>						
East of Nason Street	Residential & Commercial	60.5	60.6	>3	No	
West of Nason Street	Residential & Commercial	62.2	62.3	>3	No	
<b>Lasselle Street</b>						
North of Cactus Avenue	Residential	58.9	59.0	>5	No	
South of Cactus Avenue	Residential	60.5	60.5	>3	No	
<b>Nason Street</b>						
North of Alessandro Boulevard	Residential & Commercial	59.6	59.8	>5	No	
Between Alessandro Boulevard and Hospital Road	Residential & Commercial	58.7	59.8	>5	No	
Between Hospital Road and Cactus Avenue	Commercial	58.6	59.0	>5	No	
Between Cactus Avenue and Iris Avenue	Residential	57.8	58.3	>5	No	
South of Iris Avenue	Residential	47.3	47.3	>5	No	
<b>Lynn Lee Lane</b>						
South of Cactus Avenue	Residential	36.0	36.0	>5	No	
<b>Moreno Beach Drive</b>						
North of Cactus Avenue	Residential	60.3	60.4	>3	No	

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

South of Cactus Avenue	Residential	61.1	61.3	>3	<b>No</b>
------------------------	-------------	------	------	----	-----------

Source: ECORP 2023d. Traffic noise levels were calculated by ECORP Consulting using the FHWA roadway noise prediction model in conjunction with the trip generation rate identified by K2 Traffic Engineering, Inc. (2020, updated 2023). Refer to Appendix D, Attachment B for traffic noise modeling assumptions and results.

Notes: A total of 7 intersections were analyzed in the Traffic Impact Study; however, only roadway segments that impact sensitive receptors were included for the purposes of this analysis

As shown in Table 16, no roadway segment would generate an increase of noise beyond the FICON significance standards.

**Onsite Operational Noise Impacts**

As previously described, the Project is proposing the construction of three mixed use medical/ office buildings, two drive-thru food service buildings, one retail/ restaurant building, and one convenience store building associated with a gasoline station with 12 fueling positions. Onsite noise associated with the Proposed Project has been calculated using the SoundPLAN 3D noise model. The modeling scenario accounts for activities occurring on the Project Site such as parking lot activity, gas station operations, the fast-food restaurant drive-thru facilities and internal circulation.

Table 17 shows the predicted Project noise levels at six nearby residences in the Project vicinity as well as the Riverside County Occupational Health & Wellness Center located west of the Project Site across Nason Street. The predicted noise was compared to the City’s maximum sound levels in Section 11.80.030 of the Municipal Code for daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) time periods.

**Table 17. Modeled Operational Noise Levels**

<b>Location</b>	<b>Modeled Operational Noise Attributed to the Project (dBA L<sub>eq</sub>)</b>	<b>Daytime/ Nighttime Exterior Noise Standards (dBA L<sub>eq</sub>)</b>	<b>Exceed Daytime/ Nighttime Exterior Standard?</b>
#1 Residence northwest of Project Site	38.8	60 / 55	<b>No</b>
#2 Riverside County Occupational Health & Wellness Center	41.1	65 / 60	<b>No</b>
#3 Residence south of Project Site	45.7	60 / 55	<b>No</b>
#4 Residence south of Project Site	45.9	60 / 55	<b>No</b>
#5 Residence east of Project Site	44.6	60 / 55	<b>No</b>
#6 Residence east of Project Site	46.7	60 / 55	<b>No</b>
#7 Residence east of Project Site	44.4	60 / 55	<b>No</b>

Source: ECORP 2023d; SounPLAN v 8.2. Refer to Appendix D, Attachment D for Model Data Outputs.

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

As shown in Table 17, Project operational noise would not exceed City's the daytime or nighttime exterior noise standards at any location.

b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
---	--------------------------	--------------------------	-------------------------------------	--------------------------

**Response:**  
 Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings.

Excessive groundborne vibration impacts result from continuously occurring vibration levels. Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Construction on the Project Site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is not anticipated that pile drivers or jackhammers would be necessary during Project construction. Vibration decreases rapidly with distance, and it is acknowledged that construction activities would occur throughout the Project Site and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table 18.

**Table 18. Representative Vibration Source Levels for Construction Equipment**

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Pile Driver	0.170
Loaded Trucks	0.076
Hoe Ram	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210
Source: FTA 2018; Caltrans 2020b	

The nearest structure of concern, with regard to groundborne vibrations, are residences off Cactus Avenue and Lynn Lee Lane located approximately 35 feet south of the proposed offsite improvements on Cactus Avenue. It is noted that the residences east of the Project Site were not included in this analysis as they are located at a further distance from the proposed construction activities.

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

**Table 19 Construction Vibration Levels at 35 Feet**

Receiver PPV Levels (in/sec) <sup>1</sup>							
Large Bulldozer, Caisson Drilling, & Hoe Ram	Loaded Trucks	Jackhammer	Pile Driver	Vibratory Roller	Peak Vibration	Threshold	Exceed Threshold?
0.053	0.045	0.0211	0.102	0.126	<b>0.126</b>	0.3	<b>No</b>

Notes: <sup>1</sup>Based on the Vibration Source Levels of Construction Equipment included on Table 18 (FTA 2018). Distance to the nearest structure of concern is approximately 35 feet measured from the center of the proposed offsite improvements. See Appendix D.

A significant impact would occur if the Project would result in the generation of excessive groundborne vibration or groundborne noise levels equal to or less than 0.3 in/sec. PPV at residential structures would prevent structural damage for most residential building and vibration levels equal or less than 1.0 in/sec. PPV would prevent damage to more substantial construction, such as high-rise, commercial, and industrial buildings. For human annoyance, the vibration level threshold at which transient, or temporary, vibration sources are considered to be directly perceptible is 0.24 in/sec. PPV.

The greatest anticipated source of vibration, such as pile driving, would not be from a Vibratory Roller, which may be used within 35-feet of the nearest off-site structure. A vibratory roller creates approximately 0.210-in/sec PPV at a distance of 25-feet. This would equal a vibration level of 0.126 in/sec at 35-feet. As shown in Table 19, vibration as a result of onsite construction activities on the Project Site would not exceed 0.3 PPV at the nearest structure. Thus, onsite Project construction would not exceed the recommended threshold. A less than significant impact would occur, and no mitigation is required.

Project operations would not include the use of any stationary equipment that would result in excessive vibration levels. While the Project may accommodate heavy-duty trucks for delivery during operations, these vehicles can only generate groundborne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances. Therefore, the Project would result in a less than significant groundborne vibration impacts during operations, and no mitigation would be required.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

**Response:**  
A significant impact would occur if the project exposes people residing or working in the Project area to excessive noise levels. The Project Site is located approximately 3.78 miles southwest of the March Air Reserve Base. The Project Site is located outside the 60 dBA CNEL noise impact zone per the Transportation-Related Noise section of the Moreno Valley General Plan Final Program Environmental Impact Report. Therefore, implementation of the Proposed Project would not affect airport operations nor result in increased exposure of noise-sensitive receptors to aircraft noise. No impact would occur.

**Sources:**

- Moreno Valley, City of. 2021. City of Moreno Valley General Plan.
  2021. Moreno Valley General Plan Final Program Environmental Impact Report.
- Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
  - Section 9.10.140 Noise and Sound
- Moreno Valley Municipal Code Chapter 11.80 Noise Regulations
- 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->

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

[%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700](#))

5. K2 Traffic Engineering Inc. 2020. Focused Traffic Impact Study.

6. WEAL (Western Electro-Acoustic Laboratory, Inc.). 2000. Sound Transmission Sound Test Laboratory Report No. TL 96-186.

**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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------

**Response:**  
 The City of Moreno Valley encompasses an approximately 51.6 square mile area in Riverside County. As of 2020, the City of Moreno Valley had just over 208,000 residents. According to the City General Plan, land use within the City has been primarily residential in character with single-family residential neighborhoods dominating the western half of the City. Additionally, the City’s General Plan is consistent with the baseline growth projections contained in SCAG regional planning documents, which estimated that there will be 73,000 households and 83,200 jobs in Moreno Valley by 2040.

The Proposed Project would develop a retail/commercial center on existing vacant land consistent with the site’s General Plan designation of DC. Furthermore, the Proposed Project does not include the extension of new roads or propose new infrastructure that could indirectly induce population growth. As such, the Proposed Project would not induce substantial unplanned population growth in the area. Impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
---	--------------------------	--------------------------	--------------------------	-------------------------------------

**Response:**  
 The Proposed Project would develop a retail/commercial center on a site that is currently vacant. While residential communities are directly adjacent to the property, there are no housing units on the Project Site. As such, the Proposed Project would not displace any existing housing or people and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

**Sources:**

1. Moreno Valley 2040 General Plan, adopted June 15, 2021
  - Moreno Valley General Plan 2040 FEIR, adopted May 20, 2021
    - Section 4.14 – Population/Housing Element
      - o Table 4.14-1 Comparison of 2040 SCAG to Project
    - Section 4.11 – Land Use/Planning Element
      - o Figure 3-2 – Land Use Map
  - Housing Element
2. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**  
 The Moreno Valley Fire Department (MVFD) is the primary response agency for fires, emergency medical service, hazardous materials incidents, traffic accidents, terrorist acts, catastrophic weather events, and technical rescues for the City. MVFD operates seven fire stations: Sunnymead, Towngate,

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Sunnymead Ranch, Moreno Beach, Kennedy Park, College Park, and Morrison Park. The closest station to the Project Site is Morrison Park Fire Station (99) located at 13400 Morrison Street. The Proposed Project would construct a retail/commercial center at the northeast corner of Cactus Avenue and Nason Street. Development of the Proposed Project is not anticipated to induce substantial population growth. The Proposed Project would provide retail/commercial services to the existing population and is not anticipated to create a substantial new fire hazard. Impacts would be less than significant.</p>				
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Moreno Valley Police Department (MVPD) consists of five divisions: administration, detective, traffic, patrol, and special enforcement teams. MVPD has adopted a “Zone Policing” strategy intended to improve response times to calls for service, make officers more familiar with community areas, and connect the Police Department with citizens and business owners within their assigned zones. To facilitate this concept, the City has been divided into four zones, each comprised of a Zone Commander, Zone Supervisor, and Zone Coordinator. The Project Site is located in Zone 4. Development of the Proposed Project is not anticipated to induce substantial population growth or create a substantial new public safety hazard necessitating additional police services. Impacts would be less than significant.</p>				
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Moreno Valley Unified School District (MVUSD) is the largest school system in Moreno Valley and operates nineteen elementary schools, six middle schools and four high schools within the city limits. The Val Verde Unified School District (VVUSD) operates four elementary schools, one middle school and one high school within the city limits. The Moreno Valley campus of Riverside Community College is located on Lasselle Street, south of Iris Avenue. There are three schools within one mile of the Project Site: La Jolla Elementary School, Landmark Middle School, and Valley Christian Academy. The Proposed Project is not expected to induce substantial population growth as a result of new employment; therefore, there would be no additional demand for schools. The applicant would pay applicable development impact fees as determined by the City. A less than significant impact would occur.</p>				
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Moreno Valley Department of Parks and Recreation owns and operates over 335 acres of parks, trails, and park facilities and manages over 195 programs and services for youth and adults. While the Department does not operate any regional parks, the Lake Perris State Recreation Area is located south of Moreno Valley and is readily available for residents. This park provides more than 8,000 acres of recreational space. The nearest parks to the Project Site are Morrison Park, Fairway Park, Celebration Park, and Woodland Park. Each of these parks are within 0.5 mile to 1.5-mile distance from the Project Site. The Proposed Project is not expected to induce substantial population growth by generating new employment opportunities; therefore, there would be no additional demand for schools. The applicant would pay applicable development impact fees as determined by the City. A less than significant impact would occur.</p>				
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Proposed Project would not result in the need for new or physically altered government facilities nor affect response time or other performance objectives. The applicant would pay applicable development impact fees as determined by the City. A less than significant impact would occur.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Final Environmental Impact Report for the MoVal 2040: Moreno Valley Comprehensive Plan Update, Housing Element Update, and Climate Action Plan <ul style="list-style-type: none"> <li>• Section 4.15 – Public Services and Recreation</li> </ul> </li> <li>2. City of Moreno Valley Municipal Code</li> </ol>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul style="list-style-type: none"> <li>• Chapter 3.42, Commercial and Development Impact Fees (Ordinance No. 695)</li> <li>3. City of Moreno Valley Police Department Webpage. Zone Policing. Available at: <a href="https://moval.gov/departments/police/dept-zone-policing.html">https://moval.gov/departments/police/dept-zone-policing.html</a>. Accessed on March 2, 2023.</li> <li>4. City of Moreno Valley Fire Department Webpage. Fire Stations. Available at: <a href="https://moval.gov/departments/fire/dep-station-locations.html">https://moval.gov/departments/fire/dep-station-locations.html</a>. Accessed on March 2, 2023.</li> </ul>				
<b>XVI. RECREATION – Would the project:</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  The Moreno Valley Department of Parks and Recreation owns and operates over 335 acres of parks, trails, and park facilities and manages over 195 programs and services for youth and adults. The City hosts large amounts of open space including natural landscapes, parks, golf courses, flood basins, and other open areas. While the Department does not operate any regional parks, the Lake Perris State Recreation Area is located just south of the City and is readily available for residents. This park is over 8,000 acres and provides active recreation opportunities. The Proposed Project would not include residential development and therefore is not anticipated to result in a substantial increase in population. The Proposed Project consists of the construction of a retail/commercial center on existing vacant land. Potential population increase from employment as a result of the Proposed Project would be minimal. Therefore, the project would not result in a substantial increased use of existing neighborhood and regional or other park facilities such that substantial physical deterioration of the facility would occur or be accelerated. A less than significant impact would occur.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b>  The Proposed Project would construct new commercial buildings and would not include recreational facilities. As such, the Proposed Project would not require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. No impact would occur.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Moreno Valley 2040 General Plan, adopted June 15, 2021 <ul style="list-style-type: none"> <li>• Chapter 5 – Parks and Public Services – Section 5.2 – Parks and Open Space Network <ul style="list-style-type: none"> <li>- Figure Open Space</li> <li>- Figure 4-2 – Future Parklands Acquisition Areas</li> <li>- Figure 4-3 – Master Plan of Trails</li> </ul> </li> <li>• Chapter 10 – Open Space &amp; Resource Conservation</li> </ul> </li> <li>2. Final Environmental Impact Report for the MoVal 2040: Moreno Valley Comprehensive Plan Update, Housing Element Update, and Climate Action Plan. <ul style="list-style-type: none"> <li>• Section 4.15 – Public Services and Recreation <ul style="list-style-type: none"> <li>- Figure 4.15-1 – Public Facilities</li> <li>- Figure 4.15-2 – Existing and Planned Park and Recreation Facilities</li> </ul> </li> </ul> </li> <li>3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code</li> </ol>				
<b>XVII. TRANSPORTATION – Would the project:</b>				
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

**Response:**

A focused traffic impact study was completed by K2 Traffic Engineering, Inc. to evaluate the traffic impacts associated with the Proposed Project (K2 Traffic Engineering 2020, Appendix F). This traffic impact analysis was updated in February 2023 (Ruettgers & Schuler Civil Engineers 2023a, Appendix F). Based on the scoping agreement with the City of Moreno Valley in 2019, the traffic impact study focused on the following study scenarios:

- Existing: Year 2019
- Existing: Year 2019 Plus Project
- Pre-Project Conditions: Year 2024 plus Cumulative Projects
- Post-Project Conditions: Year 2024 plus Cumulative Projects Plus Projects
- Horizon Year without Project: General Plan Buildout 2040
- Horizon Year with Project: General Plan Buildout 2040 plus Project

Along with the six study scenarios, the scoping agreement included the following intersections:

- Cactus Avenue at Lasselle Street
- Cactus Avenue at Nason Street
- Cactus Avenue at Lynn Lee Lane/Driveway “B”
- Cactus Avenue at Moreno Beach Drive
- Nason Street at Hospital Road
- Nason Street at Alessandro Boulevard
- Nason Street at Iris Avenue
- Driveway “A” at Nason Street
- Driveway “C” at Cactus Avenue

All study intersections currently operate at a Level of Service “(LOS) D or better for both AM and PM peak hours. The City of Moreno Valley General Plan EIR defines LOS as a qualitative measure that describes operation conditions within a traffic stream, generally in terms of such factors as speed, delay, travel time, freedom to maneuver, traffic interruptions, comfort and convenience, and safety. Furthermore, LOS D traffic flow conditions is defined as high-density, but stable, flow. Speed and freedom to maneuver are severely restricted, and the driver or pedestrian experiences a generally poor level of comfort and convenience. Small increases in traffic flow will generally cause operational problems at this level.

*Trip Generation*

Trip Generation Rates for passenger vehicle trips related to the Proposed Project were estimated using rates and methodologies outlined in *Trip Generation, 10<sup>th</sup> Edition*, Published by the Institute of Transportation Engineers (ITE). Trip generation rates are shown in Table 20.

**Table 20. Trip Generation Rate**

Land Use	Unit	Daily	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Gas Station with Convenience Market (945)	Vehicle Fueling Station	205.36	12.47	51%	49%	13.99	51%	49%
Fast-Food Restaurant with Drive-Through Windows (934)	1000 Sq. Ft.	470.95	40.19	51%	49%	32.67	52%	48%
Shopping Center (820)	1000 Sq. Ft.	37.75	0.94	62%	38%	3.81	48%	52%
Medical-Dental Office Building (720)	1000 Sq. Ft.	34.8	2.78	78%	22%	3.46	28%	72%
General Office Building (710)	1000 Sq. Ft.	9.78	1.16	86%	14%	1.15	16%	84%

## ISSUES & SUPPORTING INFORMATION SOURCES:

Potentially Significant Impact

Less Than Significant with Mitigation Incorporated

Less Than Significant Impact

No Impact

Source: K2 Traffic Engineering, Inc. 2020, Appendix F

The projected trips associated with the Proposed Project are shown in Table 21. The Proposed Project has a net trip generation of 198 inbound and 111 outbound trips in the AM peak hour, 1,218 inbound and 201 outbound trips in the PM peak hour, and 5,752 daily trips.

**Table 21. Project Trip Generation**

Land Use	Unit	Quantity	AM Peak Hour			PM Peak Hour			Daily
			Total	In	Out	Total	In	Out	
Gas Station with Convenience Market (945)	Vehicle Fueling Station	12	150	76	73	168	86	82	2,464
	Pass-By Trip Deduction Rate <sup>1,2</sup>		62%	62%	62%	56%	56%	56%	28%
	Pass-By Trip Deduction		-93	-47	-45	-94	-48	-46	-690
	Total		57	29	28	74	38	36	1,774
Fast-Food Restaurant with Drive-Through Windows (934)	1000 Sq. Ft.	5.750	231	118	113	188	98	90	2,708
	Pass-By Trip Deduction Rate <sup>1,2</sup>		49%	49%	49%	50%	50%	50%	12%
	Pass-By Trip Deduction		-113	-58	-55	-94	-49	-45	-325
	Total		118	60	58	94	49	45	2,383
Shopping Center (820)	1000 Sq. Ft.	8.000	8	5	2	30	15	16	302
	Pass-By Trip Deduction Rate <sup>1,2</sup>		n/a	n/a	n/a	34%	34%	34%	12%
	Pass-By Trip Deduction		0	0	0	-10	-5	-5	-36
	Total		8	5	2	20	10	10	266
General Office Building (710)	1000 Sq. Ft.	53.9	63	54	9	62	10	52	525
Medical-Dental Office Building (720)	1000 Sq. Ft.	23.1	64	50	14	80	22	58	804
Trip Generation (without Pass-By Consideration)			515	303	211	528	230	298	6,803
<b>NET Trip Generation</b>			<b>308</b>	<b>198</b>	<b>111</b>	<b>330</b>	<b>128</b>	<b>201</b>	<b>5,752</b>

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

As shown in Table 22, all study intersections will maintain a Level of Service "D" or better for the existing conditions plus project scenario.

**Table 22. Existing Plus Project Level of Service**

No.	Intersection	AM		PM	
		LOS	Delay	LOS	Delay
1	Cactus Ave at Lasselle St	D	49.5	D	43.4
2	Cactus Ave at Nason St	C	33.0	C	25.8
3	Cactus Ave at Lynn Lee Ln/ Driveway "B"	C	28.7	C	25.0
4	Cactus Ave at Moreno Beach Dr	C	22.9	C	22.8
5	Nason St at Hospital Rd	C	32.8	C	30.0
6	Nason St at Alessandro Blvd	B	14.8	C	29.4
7	Nason St at Iris Ave	B	17.1	B	19.8
8	Driveway A at Nason St	B	11.4	B	11.0
9	Driveway C at Cactus Ave	B	12.6	B	10.5

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

As shown in Table 23, all study intersection will maintain a LOS D or better for the Without-Project Scenario.

**Table 23. Without-Project (2024) Level of Service**

No.	Intersection	AM		PM	
		LOS	Delay	LOS	Delay
1	Cactus Ave at Lasselle St	D	53.7	D	45.7
2	Cactus Ave at Nason St	D	44.1	C	28.7

ISSUES & SUPPORTING INFORMATION SOURCES:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3	Cactus Ave at Lynn Lee Ln/ Driveway "B"	C	17.2	C	17.4
4	Cactus Ave at Moreno Beach Dr	C	24.6	C	24.3
5	Nason St at Hospital Rd	C	32.1	C	26.1
6	Nason St at Alessandro Blvd	A	7.1	B	13.3
7	Nason St at Iris Ave	B	18.3	C	22.7

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

As shown in Table 24, all study intersection will maintain a LOS D or better for the Post-Project Completion Scenario.

**Table 24. Post-Project Completion (2024) Level of Service**

No.	Intersection	AM		PM	
		LOS	Delay	LOS	Delay
1	Cactus Ave at Lasselle St	D	54.0	D	47.1
2	Cactus Ave at Nason St	C	27.3	C	26.7
3	Cactus Ave at Lynn Lee Ln/ Driveway "B"	C	26.3	C	31.1
4	Cactus Ave at Moreno Beach Dr	C	24.2	C	27.5
5	Nason St at Hospital Rd	C	32.4	C	33.7
6	Nason St at Alessandro Blvd	C	20.1	D	37.5
7	Nason St at Iris Ave	C	20.9	C	23.0
8	Driveway A at Nason St	B	11.8	B	11.4
9	Driveway C at Cactus Ave	B	13.7	B	11.0

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

As shown in Table 25 below, all study intersection would maintain a LOS D or better for the General Plan Buildout (2040) scenario, except the following intersections:

- Intersection #2, Cactus Ave at Nason St: LOS E for the AM peak hour.
- Intersection #7, Nason St at Iris Ave: LOS E for the PM peak hour.

**Table 25. Without Project General Plan Buildout 2040 Level of Service**

No.	Intersection	AM		PM	
		LOS	Delay	LOS	Delay
1	Cactus Ave at Lasselle St	D	53.9	D	45.4
2	Cactus Ave at Nason St	E	62.1	D	48.8
3	Cactus Ave at Lynn Lee Ln/ Driveway "B"	D	28.7	D	30.0
4	Cactus Ave at Moreno Beach Dr	C	31.8	C	26.8
5	Nason St at Hospital Rd	D	49.9	D	42.7
6	Nason St at Alessandro Blvd	C	25.0	C	21.5
7	Nason St at Iris Ave	D	39.6	E	70.6

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

As shown in Table 26 below, all study intersections would maintain a LOS D or better for the General Plan Buildout (2040) Plus Project scenario, except the following intersection:

- Intersection #7, Nason St at Iris Ave: LOS E for the PM peak hour.

**Table 26. General Plan Buildout 2040 Plus Project Level of Service**

No.	Intersection	AM		PM	
		LOS	Delay	LOS	Delay
1	Cactus Ave at Lasselle St	D	52.6	D	46.8
2	Cactus Ave at Nason St	D	53.4	D	53.0
3	Cactus Ave at Lynn Lee Ln/ Driveway "B"	C	22.7	C	28.3

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4	Cactus Ave at Moreno Beach Dr	D	36.9	C	28.6
5	Nason St at Hospital Rd	D	51.4	D	42.7
6	Nason St at Alessandro Blvd	C	26.1	C	33.6
7	Nason St at Iris Ave	D	45.4	E	75.5
8	Driveway A at Nason St	C	15.1	B	14.7
9	Driveway C at Cactus Ave	B	14.6	B	12.7

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

According to the County of Riverside “Traffic Impact Analysis Preparation Guide”, a significant impact on an arterial street occurs when the peak hour LOS below LOS D. Additionally, for projects that propose intensities above those contained in the General Plan, a significant impact would occur if project related vehicle trips cause either a peak house LOS to degrade from acceptable (LOS A to D) to unacceptable LOS (E or F) or peak hour delay to increase as follows:

**Table 27. Significant Impact Threshold**

Pre-Project LOS	Peak Hour Delay Increase
A, B	10.0 seconds
C	8.0 seconds
D	5.0 seconds
E	2.0 seconds
F	1.0 seconds

Source: K2 Traffic Engineering, Inc. 2020, Appendix F

As shown in Table 28, the Proposed Project’s combined traffic impacts for year 2024 would have a less than significant impact. No mitigation is required.

**Table 28. Year 2024 Project Impact Analysis**

Intersection	Pre-Project Conditions		Post Project Conditions		Below LOS D	Delay Increase	Significant Impact
	LOS	Delay	LOS	Delay			
<b>AM PEAK</b>							
1. Cactus Ave at Lasselle St	D	53.7	D	54.0	No	0.3	No
2. Cactus Ave at Nason St	D	44.1	C	27.3	No	-16.8	No
3. Cactus Ave at Lynn Lee Ln/ Driveway “B”	C	17.2	C	26.3	No	9.1	No
4. Cactus Ave at Moreno Beach Dr	C	24.6	C	24.2	No	-0.4	No
5. Nason St at Hospital Rd	C	32.1	C	32.4	No	0.3	No
6. Nason St at Alessandro Blvd	A	7.1	C	20.1	No	13.0	No
7. Nason St at Iris Ave	B	18.3	C	20.9	No	2.6	No
<b>PM PEAK</b>							
1. Cactus Ave at Lasselle St	D	45.7	D	47.1	No	1.4	No
2. Cactus Ave at Nason St	C	28.7	C	26.7	No	-2.0	No
3. Cactus Ave at Lynn Lee Ln/ Driveway “B”	C	17.4	C	31.3	No	22.1	No
4. Cactus Ave at Moreno Beach Dr	C	24.3	C	27.5	No	3.2	No
5. Nason St at Hospital Rd	C	26.1	C	33.7	No	7.6	No
6. Nason St at Alessandro Blvd	B	13.3	D	37.5	No	24.2	No
7. Nason St at Iris Ave	C	22.7	C	23.0	No	0.3	No

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

## ISSUES & SUPPORTING INFORMATION SOURCES:

Potentially Significant Impact

Less Than Significant with Mitigation Incorporated

Less Than Significant Impact

No Impact

As shown in Table 29, the LOS for study intersections are expected to worsen in the long-term scenario and one study intersection is projected to operate at LOS E in year 2040 for the General Plan Buildout plus project conditions.

**Table 29. Year 2040 Project Impact Analysis**

Intersection	Pre-Project Conditions		Post Project Conditions		Below LOS D	Delay Increase	Significant Impact
	LOS	Delay	LOS	Delay			
<b>AM PEAK</b>							
1. Cactus Ave at Lasselle St	D	53.9	D	52.6	No	-1.3	Yes
2. Cactus Ave at Nason St	E	62.1	D	53.4	Yes	-8.7	No
3. Cactus Ave at Lynn Lee Ln/ Driveway "B"	D	28.7	C	22.7	No	-6.0	No
4. Cactus Ave at Moreno Beach Dr	C	31.8	D	36.9	No	5.1	No
5. Nason St at Hospital Rd	D	49.9	D	51.4	No	1.5	No
6. Nason St at Alessandro Blvd	C	25.0	C	26.1	No	1.1	No
7. Nason St at Iris Ave	D	39.6	D	45.4	No	5.8	No
<b>PM PEAK</b>							
1. Cactus Ave at Lasselle St	D	45.4	D	46.8	No	1.4	Yes
2. Cactus Ave at Nason St	D	48.8	D	53.0	No	4.2	No
3. Cactus Ave at Lynn Lee Ln/ Driveway "B"	D	30.0	C	28.3	No	-1.7	No
4. Cactus Ave at Moreno Beach Dr	C	26.8	C	28.6	No	1.8	No
5. Nason St at Hospital Rd	D	42.7	D	42.7	No	0.0	No
6. Nason St at Alessandro Blvd	C	21.5	C	33.6	No	12.1	No
7. Nason St at Iris Ave	E	70.6	E	75.5	Yes	4.9	Yes

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

With implementation of Mitigation Measure TRANS-1, intersection 7 (Nason Street/Iris Avenue) would operate at LOS D or better for Horizon Year 2040. Impacts would be less than significant.

Fair share contribution represents the percentage of construction cost that the proposed development is expected to contribute toward the aforementioned mitigation measures. The fair share contribution is calculated based on the sum of project trips in the PM peak hour at the subject location for the year 2040 plus project as a percentage of total trips during the same period, as shown in Table 30.

**Table 30. Calculation of Fair Share Contribution**

#	Location	Project Trips	Existing Trips	2040+Project Trips	Project Share
7	Nason St. at Iris Ave	79	2,314	3827	5.22%

Source: K2 Traffic Engineering, Inc. 2020, Ruettggers & Schuler Civil Engineers 2023a, Appendix F

Based on this calculation, the Proposed Project should contribute a fair share estimated at 5.22 percent for aforementioned future improvements at the Nason Street/Iris Avenue intersection.

For the long-term General Plan Buildout Horizon 2040 scenario, the Proposed Project is anticipated to have potential impacts to anticipated queue lengths two intersections. With implementation of Mitigation Measure TRANS-2 impacts would be less than significant.

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The Proposed Project would widen Cactus Avenue on the north half to its ultimate width and construct a pedestrian sidewalk at the project frontage. Sidewalk has already been provided along Nason Street in the project vicinity. In order to comply with the American with Act (ADA), the Proposed Project would be required to construct an ADA compliant access ramp for each of the proposed driveways. For the proposed traffic signal, pedestrian push buttons and signal heads would also be required ensure pedestrian safety.</p> <p>Bike lanes along Nason Street have already been provided in the project vicinity. However, bike lanes on Cactus Avenue have been provided only west of Nason Street. As the proposed street improvement to its ultimate width, bike lanes can be added in the future along with developments of other segments of Cactus Avenue to provide a continuous bike lane east of Nason Avenue.</p> <p>Nason Street has been served by Riverside Transit Agency's (RTA) Bus Routes #20 and #31. With implementation of Mitigation Measures TRANS-1 and TRANS-2, the Proposed Project would not conflict with an applicable circulation program or plan in the City of Moreno Valley. A less than significant impact with mitigation would occur.</p> <p><b>MITIGATION MEASURES</b></p> <p><b>TRANS-1:</b> The following improvements shall be provided by the developer:</p> <ul style="list-style-type: none"> <li>• Intersection #7: Modify striping of southbound Nason Street at Iris Avenue to provide two exclusive right-turn lanes, one through lane, and one exclusive left-turn lane</li> </ul> <p><b>TRANS-2:</b> The following improvements shall be provided by the developer:</p> <ul style="list-style-type: none"> <li>• Extend westbound left-turn lane on Cactus Avenue at Nason Street to provide 300 feet of storage length.</li> <li>• Extend northbound left-turn lane on Nason Street at Cactus Avenue to provide 300 feet of storage length.</li> </ul>				
<p>b) Conflict or be inconsistent with <a href="#">CEQA Guidelines section 15064.3, subdivision (b)</a>?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  Ruetters and Schuler Civil Engineers prepared a vehicle miles travelled (VMT) traffic analysis for the Proposed Project in accordance with City guidelines. As required by the City of Moreno Valley Traffic Impact Preparation Guide, the Project has been analyzed using the WRCOG online screening tool. The results of the screening tool found the Project Traffic Analysis Zone (TAZ) VMT is 17, or 4.28 percent greater than the jurisdictional baseline of 16.3 (Ruetters &amp; Schuler 2023b).</p> <p>As such, the Project would result in VMT impacts requiring mitigation; However, the WRCOG screening tool is an online model which does not account for Project design elements and components which would reduce potential VMT impacts. Project design elements and components which would encourage alternative transportation to reduce employee and patron automobile trips to and from the site and would reduce potential VMT impacts include 44 short- and long-term bicycle stalls and interior footpaths with ADA accessibility from the existing bus turnout on Nason Street which would serve the mixed-use development project. The Site Plan also includes 89 electric vehicle (EV) charging stations that would encourage the number of EVs travelling to the site, reducing greenhouse gas emissions, which is a goal of VMT reduction.</p> <p>Because the Proposed Project anticipates medical office and retail use, at least some of the workers would need to travel to the site to meet with patients/customers, access onsite medical equipment, and other job-necessary tasks that cannot be conducted remotely. However, Mitigation Measure TRANS-3</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>requires the promotion of telecommuting and alternative/flexible work schedules within the site's Covenants, Conditions, and Restrictions (CC&amp;Rs) for applicable uses. Telecommuting and alternative work schedules directly reduce VMTs and vehicle-related greenhouse gas emissions by reducing the number of vehicle trips to the site and/or scheduling trips at a less congested time of day, therefore reducing idling times in traffic. With the inclusion of these Project components, and the implementation of mitigation measure TRANS-3, potential VMT impacts would be reduced to less than significant.</p> <p><b>TRANS-3: Encourage Telecommuting and Alternative Work Schedules:</b> For applicable uses, the site CC&amp;Rs shall include a section that will encourage employers to promote telecommuting or alternative/flexible work schedules.</p>				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b> The Proposed Project includes a right-in-right-out driveway on Nason Street and a right-in-right-out driveway on Cactus Avenue. Driveway improvements would also include the construction of a sidewalk, curb, and gutter. Improvements have been designed by a registered civil engineer to meet the City of Moreno Valley's development standards. A beneficial impact would occur.</p>				
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Proposed Project includes a right-in-right-out driveway on Nason Street and a right-in-right-out driveway on Cactus Avenue. The addition of these driveways, where they currently do not exist, would result in beneficial impacts to emergency access to the Project Site. Additionally, any road closures resulting from construction of off-site improvement would be temporary and would end at project completion. A less than significant impact would occur.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Moreno Valley 2040 General Plan, adopted June 15, 2021 <ul style="list-style-type: none"> <li>• Chapter 4 Circulation Element <ul style="list-style-type: none"> <li>- Figure C-1 – Circulation Diagram</li> <li>- Table C-1 – LOS Definitions</li> <li>- Map C-2 – Existing and Planned Bicycle and Pedestrian Network</li> </ul> </li> </ul> </li> <li>2. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code</li> <li>3. K2 Traffic Engineering Inc. 2020. Cactus Nason Plaza at NEC of Cactus Ave and Nason Street Focused Traffic Impact Study. (Appendix F)</li> <li>4. Ruettgers &amp; Schuler Civil Engineers. 2023a. Supplemental Traffic Analysis for Proposed Mixed Use Project at Nason Street and Cactus Avenue, Moreno Valley (Appendix F).</li> <li>5. Ruettgers &amp; Schuler Civil Engineers. 2023b. Vehicle Miles Travelled Traffic Analysis for Proposed Mixed Use Project at Nason Street and Cactus Avenue, Moreno Valley (Appendix F).</li> </ol>				
<p><b>XVIII. TRIBAL CULTURAL RESOURCES – Would the project:</b></p>				
<p>a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in <a href="#">Public Resources Code Section 21074</a> 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:</p>				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in <a href="#">Public Resources Code Section 5020.1(k)</a> , or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> As stated previously in Chapter V. of this Initial Study, <i>Cultural Resources</i>, an ECORP Archeologist conducted a Cultural Resource Investigation and field survey for the 8.4-acre Project Area. The records</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>search results indicate that no resources have previously been recorded within the Project Area and no cultural resources were identified within the Project Area as a result of the Cultural Resources field survey. Furthermore, a search of the Sacred Lands File by the NAHC failed to indicate the presence of Native American cultural resources in the project area. A record of all correspondence is provided in Appendix C (ECORP 2019b).</p> <p>The City notified their list of California Native American tribes of the Project and invited them to consult on the potential effects to tribal cultural resources. Two tribes, the Agua Caliente Band of Cahuilla Indians and the Pechanga Band of Indians, requested consultation. After meeting with both tribes, consultation concluded with the Agua Caliente Band of Cahuilla Indians on August 12, 2022 and with the Pechanga Band of Indians on May 5, 2023. Additional information regarding AB 52 consultation is provided in the response to XVIII(a)(ii), below.</p> <p>Although no specific tribal cultural resources were identified by the Cultural Resources investigation NAHC search or in consultation with either Tribe, there is a potential for buried resources that are eligible for listing on the CRHR as defined in PRC Section 5020.1(k) that may also be tribal cultural resources. Impacts would be reduced to less than significant with the implementation of mitigation measures CR-1 through CR-8 and both Tribes requested mitigation for the treatment of unknown resources that may be discovered during ground-disturbing activities. . With implementation of Mitigation Measures CR-1 through CR-8, the Project's potential impact to tribal cultural resources would be reduced to less-than-significant.</p> <p><b>CR-1 Archaeological Monitoring.</b> Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground disturbing 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 The Pechanga Band of Indians, the contractor, and the City, shall develop a CRMP as defined in CR-3. The Project archeologist shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed.</p> <p><b>CR-2 Native American Monitoring.</b> Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Indians for tribal monitoring. The Developer is also required to provide a minimum of 30 days' advance notice to the tribes of all ground disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological 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.</p> <p><b>CR-3 Cultural Resource Monitoring Plan (CRMP).</b> 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 AB 52 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 AB 52 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:</p> <ul style="list-style-type: none"> <li>a. Project description and location</li> <li>b. Project grading and development scheduling</li> <li>c. Roles and responsibilities of individuals on the Project</li> <li>d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details</li> <li>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</li> </ul>				



<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;</p> <p>f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items</p> <p>g. Contact information of relevant individuals for the Project</p> <p><b>CR-4 Cultural Resource Disposition.</b> In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:</p> <p>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:</p> <p>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.</p> <p>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 CR-3 The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.</p> <p>The City shall verify that the following note is included on the Grading Plan:</p> <p>"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."</p> <p><b>CR-5 Inadvertent Finds.</b> 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 CR-2 before any further work commences in the affected area. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p> <p><b>CR-6 Human Remains.</b> 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</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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).</p> <p><b>CR-7 Non-Disclosure of Reburial Locations.</b> 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).</p> <p><b>CR-8 Archeology Report - Phase III and IV.</b> 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).</p>				
<p>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 <a href="#">Public Resources Code section 5024.1</a>. In applying the criteria set forth in subdivision (c) of <a href="#">Public Resources Code section 5024.1</a>, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  In response to the City’s AB 52 consultation invitation, two tribes contacted the City to request formal consultation. The City met with each tribe and concluded tribal consultation with both Tribes, the Pechanga Band of Indians and the Agua Caliente Band of Cahuilla Indians. Consultation was concluded with the Agua Caliente Band of Cahuilla Indians on August 12, 2022, and concluded with the Pechanga Band of Indians on May 5, 2023. The Pechanga Band of Indians has requested to be present for monitoring of the site during all ground disturbances and grading, the inclusion of Mitigation Measures, and Possible Reburial information. Reburial locations have been provided where, should any resources be found on the site where reburial is required, these locations are acceptable for the reburial or as identified in future consultation with the Pechanga Tribe, the City, and the Developer, at the time of discovery.</p> <p>During the course of the tribal consultation process, no Native American tribe provided the City with substantial evidence indicating that tribal cultural resources, as defined in Public Resources Code section 21074, are present on the Project Site or have been found previously on the Project Site. Notwithstanding, due to the Project Site’s location in an area where multiple Native American tribes are known to have a cultural affiliation, there is the possibility that prehistoric archaeological resources, including tribal cultural resources, could be encountered during ground-disturbing construction activities. However, this is considered unlikely due to the pervasive, historic, and on-going disturbances that have occurred on the Project Site.</p> <p>A significant impact would occur in the event a tribal cultural resource, as defined in Public Resources Code Section 21074, is uncovered, or found on the Project site during construction and not protected. Implementation of Mitigation Measures CR-1 through CR-8 would ensure the proper identification and subsequent treatment of any significant tribal cultural resources that may be encountered during ground-</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>disturbing activities associated with Project development. With the implementation of CR-1 through CR-8, the Project's potential impact to significant tribal cultural resources would be reduced to a less than significant level.</p>				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>1. Moreno Valley Municipal Code Title 7 – Cultural Preservation</li> <li>2. ECORP Consulting, Inc. 2019b. Cultural Resources Investigation for the MV Cactus 9 and Nason Project in the City of Moreno Valley. August 2019.</li> </ol>				
<p><b>XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:</b></p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b></p> <p><b>Water.</b> Water to the Proposed Project would be provided by Eastern Municipal Water District (EMWD) through existing water lines in Cactus Avenue and Nason Street and no offsite relocation or construction would be required. The Proposed Project includes water lines for the buildings and irrigation, which are considered as part of the analysis in this Initial Study. As described in Section XIX b, below, EMWD has sufficient water supply to serve the Proposed Project. A less than significant impact would occur.</p> <p><b>Stormwater.</b> The Proposed Project would involve the construction of gutters, detention basins, and associated stormwater drainage improvements. The construction of these proposed stormwater drainage facilities would require ground disturbing activities within the Project Site. These impacts are considered to be a part of the Project's construction phase and are evaluated accordingly within this Initial Study. The construction or expansion of additional off-site drainage facilities would not be required as the proposed drainage features would be designed by a registered civil engineer to ensure that flows can be accommodated by the existing stormwater system at the southwest corner of the Project Site.. A less than significant impact would occur.</p> <p><b>Wastewater.</b> The Proposed Project would connect to the existing sanitary sewer system in Cactus Avenue and Nason Street. Wastewater collection and treatment would be provided by EMWD. Municipal wastewater would be delivered to EMWD's Moreno Valley Regional Water Reclamation Facility. EMWD is responsible for the collection, transmission, treatment, reclamation, and disposal of wastewater within its service area, which includes the City, and considers planned development within the City in its planning process. This development is consistent with the City's General Plan and zoning ordinance. As such, the Proposed Project would not generate more wastewater than what is already anticipated by EMWD. A less than significant impact to water and wastewater utilities would occur.</p> <p><b>Other Utilities.</b> Other utilities such as electrical power, natural gas, and telecommunications would be connected to existing infrastructure in the area and would be consistent with City and provider regulations. Moreno Valley Electric Utility, SoCalGas, and local telephone and internet providers have service available in the Project Area and would not require construction of new or expanded facilities. A less than significant impact other would occur.</p>				
<p>b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b></p> <p>EMWD projects that water demand in its Service Area will be 208,900 AFY in 2025 and 214,900 AFY in 2030 (EMWD 2020; Table 4-5; Table 4-6). The Proposed Project would demand approximately 2,000 gpd of water per acre for commercial development, which amounts to approximately 16,800 gpd or 18.8</p>				

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>AFY. Although the Proposed Project would have additional water needs for landscape irrigation and new retail/commercial buildings, these water needs are not considered substantial to necessitate new water supply infrastructure.</p> <p>The operational phase of the Proposed Project would result in an increase in potable water demand from the local water purveyor, EMWD. Additionally, the Project is consistent with the existing land use and zoning designations that are used to calculate population projections. Therefore, the Proposed Project is consistent with the assumptions made in EMWD's 2020 Urban Water Management Plan. EMWD's 2020 Urban Water Management Plan concludes that the EMWD has sufficient water supplies available to serve the planned land uses within its service area through at least 2045 in normal, dry, and multiple dry years (EMWD 2020). Additionally, the Proposed Project would not be subject to the provisions of SB 610, which requires a Water Supply Assessment, because the Project does not include development of sufficient size. Therefore, impacts related to water supply would be less than significant.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Proposed Project would increase demand for wastewater treatment compared to current levels. EMWD considers both commercial office and commercial wastewater generation to be the same as 5 Equivalent Dwelling Units (EDU) per acre, with an EDU generating 235 gpd of wastewater. Therefore the Proposed Project would generate approximately 9,870 gpd of wastewater, which is less than 0.1% of the Moreno Valley Regional Water Reclamation Facility's capacity of 16 million gpd. As such, the Proposed Project would not generate wastewater in excess of what is anticipated by EMWD. A less than significant impact would occur.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> Solid waste generated within the City is conveyed primarily to the Riverside County Waste Management Department's Badlands Landfill. This landfill has 7,800,000 cubic yards remaining and is estimated to close in 2059 (CalRecycle 2020). However, the City's trash haulers may also access other landfills in the area, such as the Lamb Canyon Landfill and El Sobrante Landfill. All landfills in Riverside County are permitted to accept commercial waste produced by the Proposed Project.</p> <p>Based on their current and future capacities, landfills serving the City could accommodate the incremental solid waste demands of the Proposed Project. The Proposed Project would be required to comply with AB 341, Mandatory Commercial Recycling, which includes recycling programs that reduce waste to landfills by a minimum of 75 percent by 2020. Compliance with AB 341 would greatly reduce the amount of solid waste generated by the Proposed Project. As such, a less than significant impact would occur.</p>				
<p>e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b> The California Integrated Solid Waste Management Act requires that local jurisdictions divert at least 50 percent of all solid waste from landfills through waste reductions and/or recycling programs. Additionally, compliance with AB 341 would greatly reduce the amount of solid waste generated by the Proposed Project. Commercial uses proposed by the Project would abide by these regulations, in addition to</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Citywide source reduction and recycling programs. Therefore, no impact to federal, state, and local statutes and regulations related to solid waste would occur.				
<p><b>Sources:</b></p> <ol style="list-style-type: none"> <li>Title 9 – Planning and Zoning of the Moreno Valley Municipal Code</li> <li>Moreno Valley Municipal Code Chapter 8.10 Stormwater/Urban Runoff Management and Discharge Controls</li> <li>Moreno Valley Municipal Code Section 8.21.170 National Pollutant Discharge Elimination System (NPDES).</li> <li>Moreno Valley Municipal Code Chapter 8.80 – Recycling and Diversion of Construction and Demolition Waste.</li> <li>EMWD 2021. 2020 Urban Water Management Plan Available at <a href="https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1625160721">https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1625160721</a>. Accessed January 4, 2023.</li> <li>EMWD 2022. Development Services Department and Facility Design Guidelines. Rev 5/24/2022.</li> <li>CalRecycle “Facility/Site Summary Details 2020. Available at: <a href="https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367">https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367</a>. Accessed March 2, 2023.</li> </ol>				
<b>XX. WILDFIRE</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, <b>would the project:</b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b> The Project Site is not located on land designated as Very High Fire Hazard Severity Zone by CAL FIRE (CAL FIRE 2019). The Proposed Project would construct a new retail/commercial center at the northeast corner of Cactus Avenue and Nason Street. Four entry/exit driveways for the proposed development would be provided along Cactus Avenue (2), Nason Street (1), and along the private street (1) abutting the northern project boundary, thereby facilitating emergency response and evacuation if necessary. As previously stated in Section IX, Response f), traffic lanes may need to be temporarily closed during construction of improvements along Cactus Avenue and Nason Street. A traffic control plan would be implemented to maintain traffic flow and emergency response access in the Project area. Operation of the Proposed Project would be limited to the Project Site and would not include permanently blocking any roadways. Additionally, the Project Site does not contain any emergency facilities nor does it serve as an emergency evacuation route (Moreno Valley 2021). A less than significant impact would occur.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Response:</b> As described above, the Proposed Project is not located in or near land classified as Very High Fire Hazard Severity Zone (VHFHSZ). The site is characterized by a relatively flat vacant field surrounded by developed urban areas. Therefore, the Proposed Project would not expose project occupants to pollutant concentrations from wildfire as a result of slope, prevailing winds, or other factors. No impact would occur.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
---	--------------------------------	--	------------------------------	-----------

**Response:**

The Proposed Project is located within a developed area and would require utility connections to serve the proposed commercial use. However, the Proposed Project is not located in or near land classified as VHFHSZ, therefore the Proposed Project would not exacerbate fire risk resulting in temporary or ongoing impacts to the environment. No impact would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

**Response:**

As described above, the Proposed Project is not located in or near state responsibility areas or land classified as VHFHSZ. Additionally, the Project Site is located on very flat, vacant terrain and would not be subject to landslides. No wildfire impact associated with downslope or downstream flooding or landslides would occur.

**Sources:**

1. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
2. 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](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
3. Emergency Operations Plan, City of Moreno Valley, March 2009, [http://www.moval.org/city\\_hall/departments/fire/pdfs/mv-eop-0309.pdf](http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf)
  - Threat Assessment 3 – Wildfire
6. California Department of Forestry and Fire Protection (CALFIRE). 2019. Fire Hazard Severity Zone (FHSZ) Viewer. Available at: <https://egis.fire.ca.gov/FHSZ/>. Accessed on January 04, 2023.

**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?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	-------------------------------------	--------------------------	--------------------------

**Response:**

Impacts to biological and cultural resources are discussed in the respective sections of this Initial Study. Impacts would be less than significant with Mitigation Measures BIO-1 through BIO-4 and CR-1 through CR-8.

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.)?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	-------------------------------------	--------------------------	--------------------------

<b>ISSUES &amp; SUPPORTING INFORMATION SOURCES:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Response:</b>  Impacts from the Proposed Project would not be cumulatively considerable with the implementation of the Mitigation Measures BIO-1 through BIO-4, CR-1 through CR-8, GEO-1, NOI-1, and TRANS 1 through TRANS-3.</p>				
<p>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Response:</b>  Direct and indirect impacts to human beings would be less than significant with the implementation of mitigation measures listed in this Initial Study.</p>				

## MITIGATION MONITORING REPORTING PROGRAM:

Section 21081.6 of the CEQA Guidelines requires that a Mitigation, Monitoring, and Reporting Program (MMRP) be adopted upon certification of an EIR or adoption of a MND to ensure that the mitigation measures are implemented. The MMRP specifies the mitigation for the project, when in the process it should be accomplished, and the entity responsible for implementing and/or monitoring the mitigation. Public Resources Code Section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for biological resources and tribal cultural resources. The MMRP is presented below in Table 31.

**Table 31. Mitigation Monitoring and Reporting Program**

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<b>Biological Resources</b>			
<p style="text-align: center;"><b>BIO-1</b></p> <p>Pre-construction Survey for Nesting Birds: Any ground disturbance activities shall be conducted during the non-breeding season for birds (approximately September 1 through January 31). This will avoid violations of the MBTA and California Fish and Game Code §§ 3503, 3503.5 and 3513. If activities with the potential to disrupt nesting birds are scheduled to occur during the bird breeding season (February 1 through August 31), a preconstruction nesting bird survey shall be conducted no more than three days prior to ground-disturbing activities by a qualified biologist who is experienced in the identification of avian species and conducting nesting bird surveys. The nest surveys shall include the Project Site and adjacent areas where Project activities have the potential to cause nest failure. If no nesting birds are observed during the survey, site preparation and construction activities may begin. If nesting birds (including nesting raptors) are found to be present, avoidance or minimization measures shall be undertaken to avoid potential project related impacts. Measures may include establishment of an avoidance buffer until nesting has been completed and periodic nest monitoring by the Project biologist. The width of the avoidance buffer will be determined by the Project biologist. Typically, this is 300 feet from the nest site in all directions (500 feet is typically recommended by CDFW for raptors), until the juveniles have fledged and there has been no evidence of a second attempt at nesting. The monitoring biologist will monitor the nest(s) during construction and document any findings.</p>	<p>No more than three days prior to ground-disturbing activities</p>	<p>Applicant/ Qualified Biologist/ Planning Division</p>	



Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<p style="text-align: center;">BIO-2</p> <p>Presence/Absence Surveys for Crotch Bumble Bee: To avoid adverse effects to Crotch bumble bee that may be present within the Project Site, a qualified biologist knowledgeable of Crotch bumble bee species ecology will conduct a survey of areas that may provide habitat for this species. The qualified biologist shall contact CDFW to request the agency approved survey protocol for Crotch bumble bee and shall follow the agency-accepted protocol when conducting the surveys. The survey will be conducted within one year prior to vegetation removal and/or grading. Surveys should be conducted during the flying season when the species is most likely to be detected above ground, between March 1 and September 1 (Thorp et al 1983). Within 30 days of completing the survey, the qualified biologist shall prepare a Crotch Bumble Bee Survey Report and submit it to the Project proponent. The report shall include, at minimum, a description of the methods to conduct the surveys, a description of suitable habitat areas, and a map of the locations where Crotch bumble bee and any other special-status species were observed. The qualified biologist shall submit CNDDDB forms for any Crotch bumble bees or other special-status species observed during the surveys. The survey report shall also include measures sufficient to avoid “take” or other adverse impacts to Crotch bumble bee, if found during the surveys.</p> <p>If surveys confirm the presence of Crotch bumble bee, and if adverse impacts or “take” of the species cannot be avoided, then the Project proponent will need to obtain an Incidental Take Permit from CDFW. The ITP application shall be submitted to CDFW approximately one year prior to the take or adverse impacts to the species to allow time for the processing of the application and the issuance of the ITP. Adverse impacts or take of this species shall not occur until CDFW has issued the ITP.</p>	<p style="text-align: center;">Prior to issuance of Grading Permit</p>	<p style="text-align: center;">Applicant/ Qualified Biologist/ Planning Division</p>	
<p style="text-align: center;">BIO-3</p> <p>Pre-Construction Surveys for Burrowing Owl: Pre-construction surveys for burrowing owl shall be conducted within the Project Site and adjacent areas prior to the start of ground disturbing activities. The surveys shall follow the methods described in the Western Riverside</p>	<p style="text-align: center;">Within 30 days prior to ground-disturbing activities</p>	<p style="text-align: center;">Applicant/ Qualified Biologist/ Planning Division</p>	

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<p>MSHCP Burrowing Owl Survey Instructions (RCTLMA 2006). According to Western Riverside MSHCP's Burrowing Owl Survey Instructions, focused burrowing owl surveys shall be conducted because suitable habitat was recorded during the burrowing owl habitat assessment. If burrowing owls and/or suitable burrowing owl burrows with sign (e.g., whitewash, pellets, feathers, prey remains) are identified on the Project Site during the survey and impacts to the species are unavoidable, additional mitigation may need to be implemented, such as implementing a no-disturbance buffer around occupied burrows or seasonal work restrictions. In addition to the focused burrowing owl surveys, preconstruction surveys shall take place within 30-days prior to ground disturbance in accordance with the Western Riverside MSHCP Burrowing Owl Survey Instructions (RCTLMA 2006) and the CDFG Staff Report on Burrowing Owl Mitigation (CDFG 2012).</p>			
<p style="text-align: center;"><b>BIO-4</b></p> <p>Stephens' Kangaroo Rat Mitigation Fee: In accordance with Moreno Valley Municipal Code 8.60 and to offset impacts to the Stephens' kangaroo rat, all applicants for development permits within the Stephens' kangaroo rat fee assessment area must pay an impact and mitigation fee of five hundred dollars (\$500.00) per gross acre located within the parcel to be developed an any offsite areas that are disturbed resulting from related Project activities. Further coordination with the RCA regarding the mitigation fee may be required.</p>	<p style="text-align: center;">Prior to issuance of Grading Permit</p>	<p style="text-align: center;">Applicant/ Qualified Biologist/ Planning Division</p>	
<b>Cultural and Tribal Cultural Resources</b>			
<p style="text-align: center;"><b>CR-1</b></p> <p>Archaeological Monitoring. Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground disturbing activities. 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 The Pechanga Band of Indians, the contractor, and the City,</p>	<p style="text-align: center;">Prior to the Issuance of Grading Permit</p>	<p style="text-align: center;">Applicant/ Qualified Archeologist/ Public Works</p>	

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<p>shall develop a CRMP as defined in CR-3. The Project archeologist shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed.</p>			
<p style="text-align: center;"><b>CR-2</b></p> <p>Native American Monitoring. Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Indians for tribal monitoring. The Developer is also required to provide a minimum of 30 days' advance notice to the tribes of all ground disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological 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.</p>	<p>Prior to the Issuance of Grading Permit</p>	<p>Applicant/ Qualified Archeologist/ Public Works</p>	
<p style="text-align: center;"><b>CR-3</b></p> <p>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 AB 52 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 AB 52 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 AB 52. Details in the Plan shall include:</p> <ul style="list-style-type: none"> <li>a. Project description and location</li> <li>b. Project grading and development scheduling</li> </ul>	<p>Prior to the Issuance of Grading Permit</p>	<p>Applicant/ Qualified Archeologist/ Public Works</p>	

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<ul style="list-style-type: none"> <li>c. Roles and responsibilities of individuals on the Project</li> <li>d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details</li> <li>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</li> <li>f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items</li> <li>g. Contact information of relevant individuals for the Project</li> </ul>			
<p style="text-align: center;">CR-4</p> <p>Cultural Resource Disposition. In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:</p> <ul style="list-style-type: none"> <li>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: <ul style="list-style-type: none"> <li>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.</li> <li>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</li> </ul> </li> </ul>	<p>During the course of Ground Disturbing Activities</p>	<p>Applicant/ Qualified Archeologist/ Public Works/ Planning Division</p>	

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<p>sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in CR-3 The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.</p>			
<p>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."</p>	<p>Prior to issuance of a Grading Permit</p>	<p>Applicant/ Public Works/ Planning Division</p>	
<p>CR-5 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</p>	<p>During the course of Ground Disturbing Activities</p>	<p>Applicant/ Qualified Archeologist/ Public Works/ Planning Division</p>	

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<p>consultation with the State Historic Preservation Officer (SHPO) and any and all Consulting Native American Tribes as defined in CR-2 before any further work commences in the affected area. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p>			
<p style="text-align: center;">CR-6</p> <p>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).</p>	<p>During the course of Ground Disturbing Activities</p>	<p>Applicant/ Qualified Archeologist/ Public Works</p>	
<p style="text-align: center;">CR-7</p> <p>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).</p>	<p>During the course of Ground Disturbing Activities</p>	<p>Applicant/ Qualified Archeologist/ Contractor/ Public Works/ Planning Division</p>	
<p style="text-align: center;">CR-8</p> <p>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</p>	<p>Prior to Final Inspection</p>	<p>Applicant/ Qualified Archeologist/ Contractor/ Public Works</p>	

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<p>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).</p>			
<b>Geology and Soils</b>			
<p style="text-align: center;">GEO-1</p> <p>The developer shall ensure that any excavations below 4 feet in depth are closely monitored by a qualified paleontological monitor. Any specimens shall be collected by the monitor. Sediment samples shall be collected and processed to determine the small fossil potential in the Project Area. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution.</p>	<p>During Construction</p>	<p>Developer/ Contractor/ Paleontological Monitor/ Public Works/ Planning Division</p>	
<b>Noise</b>			
<p style="text-align: center;">NOI-1</p> <p>The Project improvement and building plans will include the following requirements for construction activities along the south side of Cactus Avenue adjacent to the residential uses:</p> <ul style="list-style-type: none"> <li>• Construction contracts must specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices.</li> <li>• A sign, legible at a distance of 50 feet, shall be posted at the offsite Project</li> </ul>	<p>Prior to, and During Construction Activities</p>	<p>Applicant/ Contractor/ Noise Disturbance Coordinator/ Public Works/ Planning Division</p>	

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<p>construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the disturbance coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (starting too early, malfunctioning muffler, etc.) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City. All signs posted at the construction site shall include the contact name and the telephone number for the noise disturbance coordinator.</p> <ul style="list-style-type: none"> <li>• As applicable, all equipment shall be shut off when not in use.</li> <li>• Equipment staging shall be located in areas that create the greatest distance between construction-related noise/vibration sources and sensitive receptors surrounding offsite construction.</li> <li>• During offsite construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receptors nearest the Project Site.</li> <li>• Jackhammers, pneumatic equipment, and all other portable stationary noise sources will be directed away from residential receptors. Either one-inch plywood or sound blankets can be utilized for this purpose. They should reach up from the ground and block the line of sight between equipment and the nearest off-site residences. The shielding should be without holes and cracks.</li> </ul>			



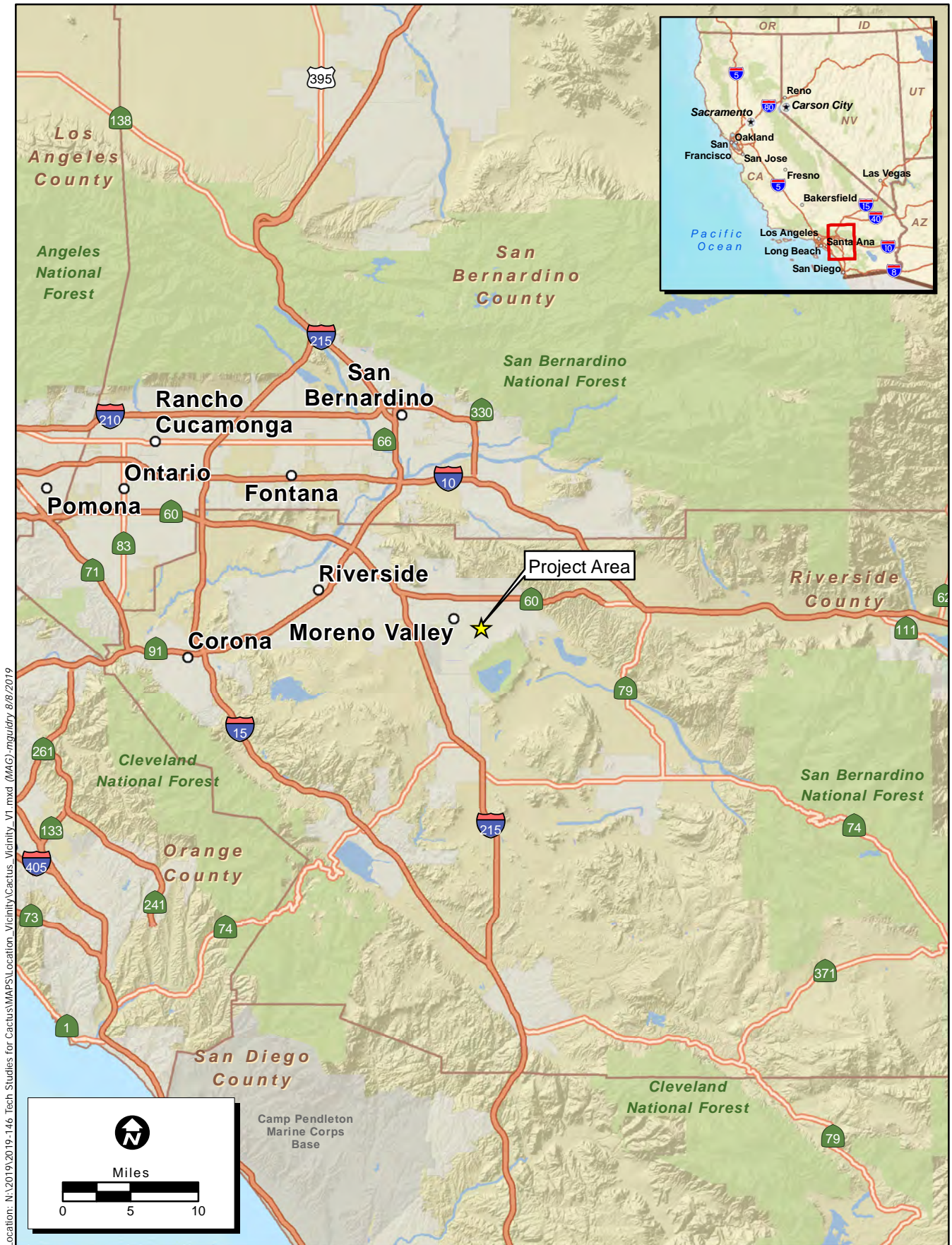
Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<ul style="list-style-type: none"> <li>Per Chapter 11.80 of the City of Moreno Valley Municipal Code, construction is prohibited between the hours of 8:00 p.m. and 7:00 a.m.</li> </ul>			
<b>Transportation</b>			
<p style="text-align: center;">TRANS-1</p> <p>The following improvements shall be provided by the developer:</p> <ul style="list-style-type: none"> <li>Intersection #7: Modify striping of southbound Nason Street at Iris Avenue to provide two exclusive right-turn lanes, one through lane, and one exclusive left-turn lane</li> </ul>	During Construction	Developer/ Contractor/ Planning Division/ Public Works	
<p style="text-align: center;">TRANS-2</p> <p>The following improvements shall be provided by the developer:</p> <ul style="list-style-type: none"> <li>Extend westbound left-turn lane on Cactus Avenue at Nason Street to provide 300 feet of storage length.</li> <li>Extend northbound left-turn lane on Nason Street at Cactus Avenue to provide 300 feet of storage length.</li> </ul>	During Construction	Developer/ Contractor/ Planning Division/ Public Works	
<p style="text-align: center;">TRANS-3</p> <p>Encourage Telecommuting and Alternative Work Schedules:</p> <ul style="list-style-type: none"> <li>For applicable uses, the site CC&amp;Rs shall include a section that will encourage employers to promote telecommuting or alternative/flexible work schedules.</li> </ul>	During Project Operations	Applicant/ Developer/ Project Commercial Tenants	

# **ATTACHMENT A – FIGURES**

**1 – Project Vicinity**

**2 – Project Location**

**3 – Project Site Plan**

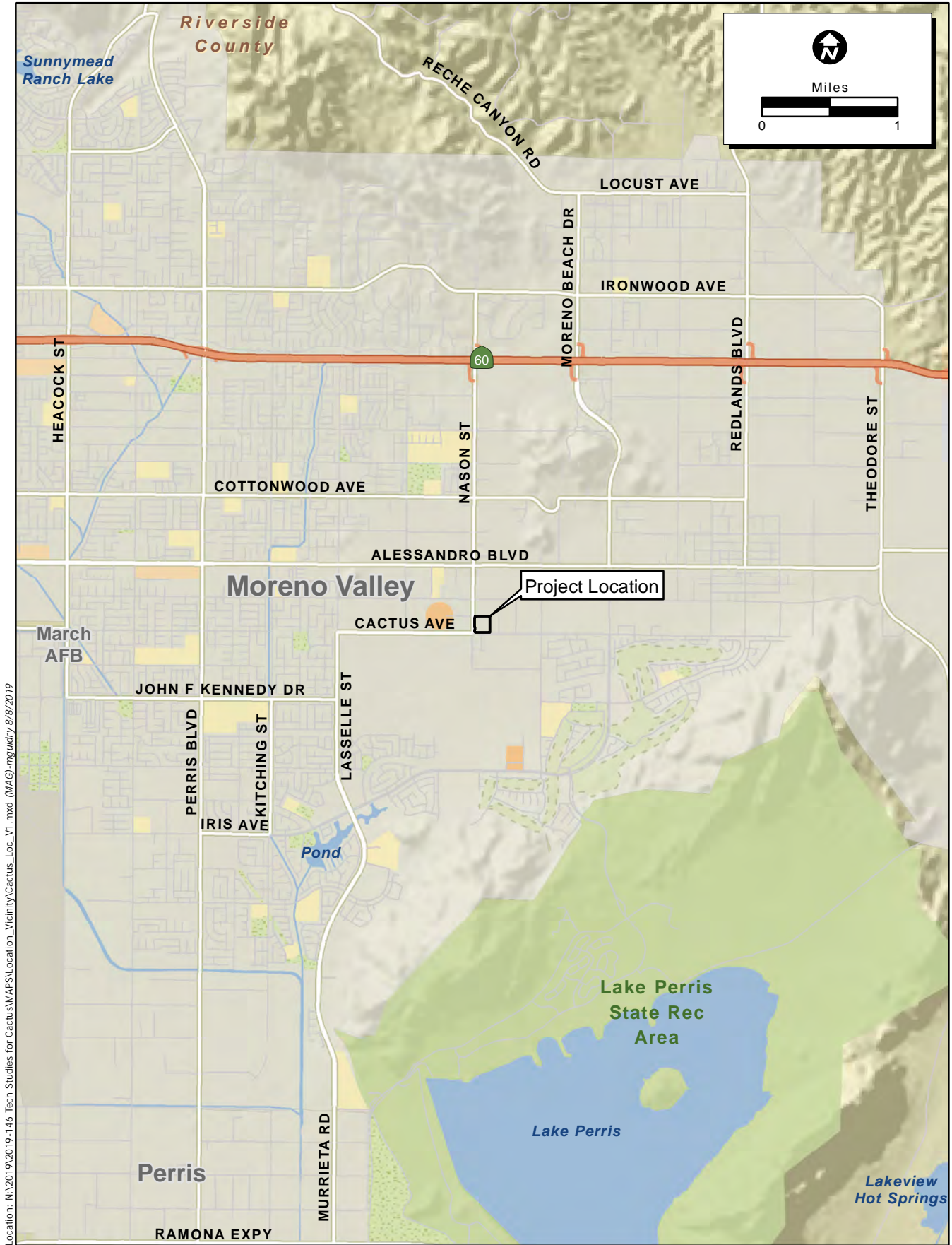


Location: N:\2019\2019-146\_Tech Studies for Cactus\MAPS\Location\_Vicinity\_V1.mxd (MAC)\mguidry\_8/8/2019

Map Date: 8/8/2019  
 Service Layer Credits: Sources: Esri, USGS, NOAA

**Figure 1. Project Vicinity**



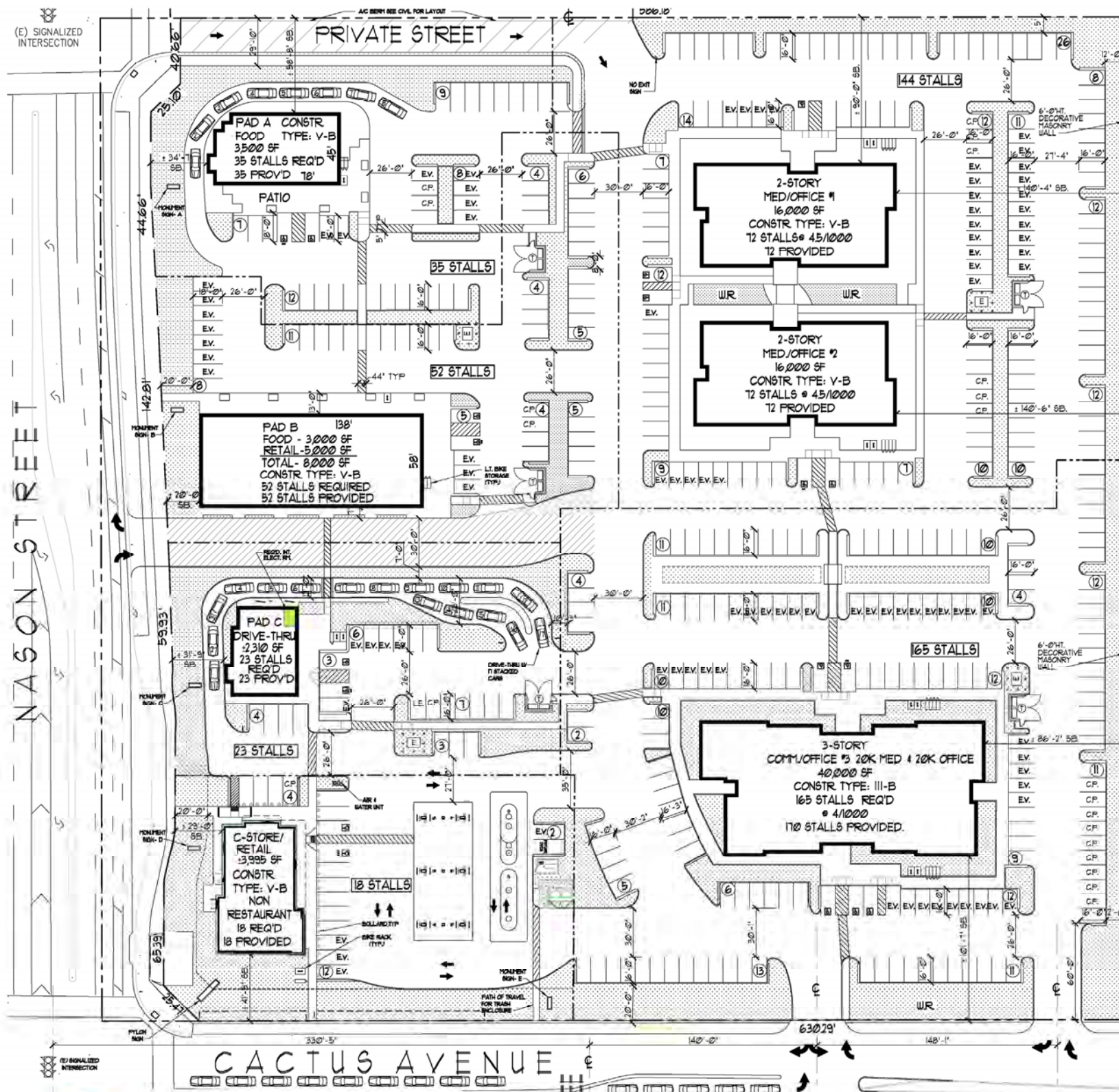


Location: N:\2019\2019-146\_Tech Studies for Cactus\MAPS\Location\_Vicinity\Cactus\_Loc\_V1.mxd (MAG)-mguidry 8/8/2019

Map Date: 8/8/2019  
Source: ESRI

**Figure 2. Project Location**





### PROJECT SUMMARY

LAND AREA: 47-368,000 SF. 8.4 ACRE  
 PRIVATE STREET AREA: 5600-368,000 = 362,400 8.32 ACRE

APN: 486 290 038  
 ZONE: DC COMMUNITY COMMERCIAL

LOT COVERAGE: 89,805 SF. / 362,400 SF. = 24.76%  
 (EXCLUDES PUMP CANOPY)

FAR: 17,805 SF. PADS A-C + C STORE  
 32,000 SF. (B#1 + B#2)  
 40,000 SF. B#3  
 89,805 SF. = (24.79 %)

LAND TO BUILDING RATIO: 4:1

**PROPOSED PAD BUILDINGS:**

PAD A FOOD	3,500 SF.
PAD B RETAIL	5,000 SF.
PAD B FOOD	3,000 SF.
PAD C FOOD	2,310 SF.
C-STORE / RETAIL	3,995 SF.
TOTAL FOOD/RETAIL	17,805 SF.

**PROPOSED COMMERCIAL/OFFICE BUILDINGS:**

2 STORY MED BUILDING #1	16,000 SF.
2 STORY MED BUILDING #2	16,000 SF.
3 STORY BUILDING #3	40,000 SF.
MED/OFFICE	
TOTAL COMMED/OFFICE	72,000 SF.

**PARKING REQUIRED:**

PAD A FOOD	10/1000 = 3,500 SF. =	35 STALLS
PAD B RETAIL	45/1000 = 5,000 SF. =	22 STALLS
PAD B FOOD	10/1000 = 3,000 SF. =	30 STALLS
PAD C FOOD	10/1000 = 2,310 SF. =	23 STALLS
C-STORE / RETAIL	45/1000 = 3,995 SF. =	18 STALLS

MED. OFFICE BUILDING #1 & #2	45/1000 = 32,000 SF. =	144 STALLS
OFFICE BUILDING #3		
OFFICE	4/1000 = 20,000 SF. =	80 STALLS
MED	45/1000 = 20,000 SF. =	90 STALLS
TOTAL REQUIRED:		442 STALLS

**PARKING PROVIDED:**

PAD A FOOD		35 STALLS
PAD B RETAIL		52 STALLS
PAD C FOOD		23 STALLS
C-STORE / RETAIL		18 STALLS
MED/OFFICE BUILDING #1 & #2		144 STALLS
OFFICE BUILDING #3		170 STALLS
TOTAL PROVIDED:	(NO COMPACT STALLS ALLOWED)	442 STALLS

REQUIRED SHORT-TERM & LONG-TERM BICYCLE STALLS (5% OF 448 STALLS)

SHORT TERM BICYCLE: 22 STALLS  
 LONG TERM BICYCLE: 22 STALLS  
 TOTAL: 44 STALLS

**ADA REQUIRED:**

PAD A FOOD	2
PAD B RETAIL	2
PAD C FOOD	1
C-STORE / RETAIL	1
MED. OFFICE BUILDING #1 & #2	6
OFFICE BUILDING #3	6
TOTAL REQUIRED:	19 STALLS

**ADA PROVIDED:**

PAD A FOOD	2(1 VAN) STALLS
PAD B RETAIL	2(1 VAN) STALLS
PAD C FOOD	2(1 VAN) STALLS
C-STORE / RETAIL	2(1 VAN) STALLS
MED/OFFICE BUILDING #1 & #2	6(2VAN) STALLS
OFFICE BUILDING #3	6(1 VAN) STALLS
TOTAL PROVIDED:	20 STALLS

**EV PARKING STALLS:**

PAD A FOOD	1
PAD B RETAIL	10
PAD C FOOD	5
C-STORE / RETAIL	4
MED. OFFICE BUILDING #1 & #2	29
OFFICE BUILDING #3	34
TOTAL PROVIDED:	89

EV REQUIRED: 89

**LEGEND:**

- C.P. CAR POOL
- EV. ELECTRIC VEHICLES
- SHORT TERM BICYCLE STALL
- LONG TERM BICYCLE STALL

**DISCLAIMER:** THE DIGITAL CONCEPT CADD SITE PLAN BY RED ARCHITECTURAL GROUP (RED) IS FOR THE USE ONLY BY HUITT-ZOLLERS, INC. IN PREPARATION OF CIVIL ENGINEERING DOCUMENTS ON THE PROJECT. MEASUREMENTS INDICATED BY RED HAVE BEEN TAKEN FROM INFORMATION PROVIDED BY OTHERS AND HAVE NOT BEEN VERIFIED FOR ACCURACY FOR THIS CONCEPT PLAN. USE IS GRANTED TO HUITT-ZOLLERS, INC. ONLY. USE OF THE DIGITAL CADD FILE BY OTHERS IS NOT GRANTED BY RED.

02



RED PROJECT NUMBER: 486.1801.01

**NASON STREET AND CACTUS AVENUE CONCEPT PLAN  
 MORENO VALLEY, RIVERSIDE COUNTY, CA**

UPDATED: 04/06/23



**R·E·D Architectural Group**

PLANNING ■ ARCHITECTURE ■ INTERIORS  
 3436 VERDUGO ROAD, SUITE 200, GLENDALE, CALIFORNIA 91208  
 P 818.957.7765 ■ 818.957.7767 F